

## **DATA PROTECTION AND PRIVACY POLICY**

LCG Int. Limited (LCG) may process information relating to you, including holding such information in a manual format or electronic database, in order to satisfy any contractual, regulatory or statutory requirements we may have. By opening a trading account with the Company, the client hereby gives its consent to such collection, processing, storage and use of personal information by the Company as explained below. Unless we receive specific written instructions to the contrary, by providing this information you agree that we may process this information in order to fulfil such obligations.

### **Privacy Policy**

#### **Introduction:**

Protecting the security and privacy of your personal information is important to LCG and to the way it conducts its business in compliance with laws on privacy, data protection and data security. The purpose of this policy is to outline what information LCG may collect, how it uses and safeguards that information and with whom it may share it.

At LCG, we are committed to maintaining the highest standards of integrity in our business. In the course of our business, it is necessary to collect Personal Information about our potential clients. We take this activity seriously and seek to provide fair, secure and appropriate methods for the handling of Personal Information. All such activities are intended to be consistent with both generally accepted privacy ethics and standard business practices. Your Personal Information may be shared with a limited number of trusted partners and/or affiliates of LCG where such use is restricted to the management of your account.

If you have any questions or comments about LCG's Data Protection and Privacy Policy, please contact our Customer Support team at [Customerservices.int@lcg.com](mailto:Customerservices.int@lcg.com)

#### **Personally Identifiable Information**

Through its websites, LCG will not collect any personally identifiable information about you (e.g. your name, address, telephone number or e-mail address ("Personal Information")), unless you voluntarily choose to provide it (e.g. by registration, email enquiry, survey). If you do not want your personal information collected, please do not submit it.

By submitting your Personal Information, you consent to LCG using your Personal Information in the ways listed below.

#### **How does LCG use your information?**

We will use, store, process and handle Your Personal Information (in case you are a natural person).

LCG may use your information for any one or more of the following purposes:

- to confirm your identity
- to maintain your personal profile
- to manage your account and keep you updated on all matters that concern your account
- to provide the services to you that you have requested including processing transactions
- to contact you when necessary or appropriate in relation to the services being provided to you
- to provide you with information about our products and services and provide you with information or opportunities that we believe might be relevant to you
- to tailor the website or other service we provide to you to your needs and interests
- to create anonymised statistical data

If you choose not to have your Personal Information used to support LCG's customer relationship programs (especially direct-marketing or market-research), LCG will respect your choice. LCG does not now (and does not intend to in the future) sell, rent or otherwise market your Personal Information to third parties.

You may opt out of receiving marketing emails at any time by selecting the 'unsubscribe' link at the top of the emails or by emailing our Customer Support team at [customerservices@lcg.com](mailto:customerservices@lcg.com), with your request.

### **Contact Clients**

From time to time the Company may contact clients whether by phone or email for the purpose of administering the terms of the Agreement between us. Clients consent to the receipt of such contact when they consent to our terms and conditions of use when registering with the Company. Any person wishing to opt out of further contact with the Company at any time whatsoever is entitled to do so, simply by contacting the Company whether by phone or email and requesting that no further contact on behalf of the Company be made.

### **Non-Personal Information Collected Automatically**

When you access its websites, LCG may automatically (i.e. not by registration) collect statistical information that is not personally identifiable (e.g. type of Internet browser and computer operating system used; domain name of the website from which you came; number of visits, average time spent, pages viewed). LCG may use this information and share it within the LCG group to measure the use of its website and improve its content.

### **Who may LCG disclose Personal Information to?**

Your Personal Information may be disclosed to:

- the Cayman Islands Monetary Authority (CIMA) and other regulatory and government bodies whom LCG is required to disclose by law;
- financial institutions and other similar organizations that LCG deals with in the course of its business;
- service providers and specialist advisers that provide services to LCG;

- any third parties where this is necessary to process a transaction or provide services which you have requested;
- introducing brokers or similar brokers who have been contracted to provide us with administrative, financial, insurance, research or other services;
- credit providers, courts, tribunals and regulatory authorities as agreed or authorized by law;
  - credit reporting or reference agencies;
  - anyone authorized by you (such as your financial adviser, broker, solicitor or accountant).

Please note LCG will never sell or provide your Personal Information to third parties for marketing purposes.

In addition, the Company may engage third parties to help carry out certain internal functions such as account processing, fulfillment, client service, client satisfaction surveys or other data collection activities relevant to its business. Use of the shared information is strictly limited to the performance of the above and is not permitted for any other purpose.

Generally, we require any third party service provider that we share Personal Information with, undertake to respect any individual's right to privacy and comply with the Data Protection Principles. These third-party service providers may keep a record of any searches performed on our behalf and may use the search details to assist other companies in performing their searches. Third parties are not covered by this privacy policy.

In cases where clients have been introduced by a Business Introducer, such Business Introducer may have access to clients' information. Hence, clients hereby consent to the sharing of information with such Business Introducer.

### **Third Party Sites**

The LCG web site contains links to other web sites. Please be notified that LCG cannot be held responsible for the privacy practices of other web sites. We encourage all visitors to be aware and read the privacy statements of each and every web site that collects personally identifiable information.

### **Retention of records**

We will not keep your information for any longer than is required. In many cases, information must be kept for considerable periods of time. Retention periods will be determined taking into account the type of information that is collected and the purpose for which it is collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable time. Under Applicable Regulations, we will keep records containing Client personal data, trading information, account opening documents, communications and anything else which relates to the Client for at least five years after termination of the Agreement between us. In any event, we will keep your information for the duration of applicable Limitation of Actions Laws as a minimum.

### **Security**

LCG takes precautions to ensure the security of your personal information and strives to keep it accurate. LCG carefully protects your personal information from loss, destruction, falsification,

manipulation, and unauthorized access or unauthorized disclosure and has developed and will maintain security procedures to safeguard Personal Information against loss, theft, copying, and unauthorized disclosure, use or modification. Access to Personal Information is restricted to employees and authorized service providers who need it to perform their work.

While we will use all reasonable efforts to safeguard your information, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data transferred from you, or to you via the internet.

**Access to your Personal Information held by us**

As a natural person you have the right to obtain a copy of any personal information which we hold about you and to advise us of any perceived inaccuracy.

To make a request, please contact us, verifying your identity and specifying what information you require. We may charge an administrative fee.

You may contact us [Customerservices.int@lcg.com](mailto:Customerservices.int@lcg.com)

**Restriction of responsibility**

The Company is not responsible for the privacy policies or the content of sites to which [Company's website] links and has no control of the use or protection of information provided by the clients or collected by those sites. Whenever a client elects to link to a co-branded web site or to a linked web site, the client may be asked to provide registration or other personal information. Please note that such information is recorded