

DATA PROTECTION AND PRIVACY POLICY

Version: May 2017

This is the Data Protection and Privacy Policy of London Capital Group Limited.

Data Protection Act

London Capital Group Limited (**LCG**, “we” and “us”) may process information relating to you (including personal data as defined under the Data Protection Act 1998), including holding such information in a manual format or electronic database, to satisfy contractual, regulatory or statutory requirements we may have. Unless we receive specific written instructions to the contrary you agree that we may process this information to fulfil such obligations.

Privacy Policy - Introduction

Protecting the security and privacy of your personal information is important to us and to the way we conduct our business in compliance with laws on privacy, data protection and data security. The purpose of this policy is to outline what information we may collect, how we use and safeguard that information and with whom we may share it.

At LCG, we are committed to maintaining the highest standards of integrity in our business. In conducting our business, it is necessary to obtain, handle, process, disclose, transfer and store information about our clients. We take these activities seriously and seek to provide fair, secure and appropriate methods, that are consistent with both generally accepted privacy ethics and standard business practices, when carrying them out.

If you have any questions or comments about LCG’s Data Protection and Privacy Policy, please contact our Customer Support team via the details on our website.

Personally Identifiable Information

Through our websites, we 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 provide it (e.g. by registration, email enquiry, survey etc.)). If you do not want your personal information collected, please do not submit it.

By using our website, submitting your Personal Information or using our services, you consent to us using your Personal Information as described below. You also consent to us transferring your Personal Information outside the European Economic Area (“EEA”) where it is done in connection with us providing services to you or where it is necessary for us to fulfil our legal obligations.

How does LCG use your information?

We 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 programmes (especially direct-marketing or market-research), we 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, other than as anonymised statistical data.

You may opt out of receiving marketing emails at any time by selecting the 'unsubscribe' link at the top of the emails or by contacting our Customer Support team with your request. However, we must still send you notices about changes to the LCG Terms and Conditions and other important matters concerning the operation of your account.

Non-Personal Information Collected Automatically

When you access our website, we 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). We may use this information and share it with our affiliates and partners 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 Financial Conduct Authority and other regulatory authorities, governmental bodies or authorities whom we are required to disclose by law;
- financial institutions and other similar organisations that we deal with in our business;
- service providers and specialist advisers who have been contracted to provide us with administrative, financial, insurance, research or other services;
- any third parties where this is necessary to process a transaction or provide services which you have requested;
- introducing brokers or similar persons with whom we have a mutual relationship (any of whom may be outside or inside the EEA);
- credit providers, courts, tribunals and law enforcement agencies;
- credit reporting or reference agencies; or
- anyone authorised by you (such as your financial adviser, broker, solicitor or accountant).

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.

Third Party Sites

Our website contains links to other web sites. Please be notified that we are not responsible for the privacy practices of other web sites. We encourage you to be aware and read the privacy statements of each web site that collects your personally identifiable information.

Retention of records

We will keep Personal Information only so long as it is necessary, including for the purposes of updating the product or services or as required by law. When the Personal Information is no longer required, it will be destroyed either by shredding or other approved destruction methods to prevent unauthorised parties from gaining access to the information during and after the process. We will safeguard information in our custody.

Security

We take precautions to ensure the security of your personal information and strive to keep it accurate. We carefully protect your personal information from loss, destruction, falsification, manipulation, and unauthorised access or unauthorised disclosure and have developed and will maintain security procedures to safeguard Personal Information against loss, theft, copying, and unauthorised disclosure, use or modification. Access to Personal Information is restricted to employees and authorised service providers who need it to perform their work.

Access to your Personal Information held by us

Under the UK Data Protection Act, 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 (subject to certain exceptions).

If you wish to make an access request, please contact us verifying your identity and specifying what information you require. We may charge a fee to cover the cost of verifying the application and locating and retrieving, reviewing and copying any material requested.

Cookies

Cookies are small pieces of data sent from a website and stored in a user's web browser whilst the user is browsing that website.

How we use Cookies and what Information we collect.

Like most websites, we use cookies to improve your experience on our website as the data from cookies enables us to determine the type of browser and settings you are using, where you have been on our website, when you return to the website, where you came from and to ensure your information is secure.. We do not link the information we store in cookies to any personally identifiable information you submit while on our site. If you choose to opt out of cookies you may still use our site, but your ability to use some areas or features will be limited.

We would strongly recommend that you allow cookies on our website to ensure you have the best possible experience. Turning off cookies may result in reduced performance of our website and trading platform, however if you would still like to opt out of cookies, you can do this through your website browser. Our customer support team would be happy to talk you through this process if you require assistance.

For more information about the types of cookies we use, please see our Cookie policy.

Use of Web Beacons

Some pages on our website may contain electronic images known as web beacons (sometimes known as clear gifs) that allow us to count users who have visited these pages. Web beacons collect only limited information which includes a cookie number, time and date of a page view, and a description of the page on which the web beacon resides. We may also carry web beacons placed by third party advertisers. These beacons do not carry any personally identifiable information and are only used to track the effectiveness of each campaign.

How to Contact Us

If you want to:

- change your Personal Information;
- access your Personal Information; or
- make an enquiry about this Data Protection and Privacy Policy,

then telephone us at +44 (0) 207 456 7020 or email us at customerservices@lcg.com or write to us at London Capital Group, 77 Grosvenor Street, Mayfair, London, W1K 3JR, UK.