

# DATA PROTECTION AND PRIVACY POLICY

**Version: October 2015**

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

## Data Protection Act

London Capital Group Limited (LCG) 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, in order to satisfy any contractual, regulatory or statutory requirements we may have. 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 and will not breach any elements of the UK Data Protection Act 1998.

If you have any questions or comments about LCG's Privacy Policy, please contact our Customer Support team via the details on the Contacts page.

### 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. You also consent to LCG transferring your Personal Information outside the European Economic Area where it is necessary for LCG to fulfil its contractual, regulatory and legal obligations. We will only transfer Personal Information to organisations outside the EEA if we have assessed that the organisation we are sending the information to as having appropriate controls and safeguards in place.

### How does LCG use your information?

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 programmes (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 (via the details on the Contacts page) with your request.

### **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 Financial Conduct Authority and other regulatory and government bodies whom LCG is required to disclose by law;
- financial institutions and other similar organisations 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 authorised by law;
- credit reporting or reference agencies;
- anyone authorised 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.

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**

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 keep Personal Information only as 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**

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 unauthorised access or unauthorised disclosure and has 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 on our Site and what Information we collect.**

Like most websites, LCG uses cookies to improve your experience on our websites 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 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 LCG uses please see our Cookie policy.

### **Use of Web Beacons**

Some of our Web pages 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 a particular campaign.

### **Privacy Statement Changes**

LCG may change this privacy statement at any time. You are advised to read this statement each and every time you access the site so that you are satisfied with the privacy conditions under which you provide LCG with your personal information.