

PRIVACY POLICY

Document Control

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1. Who are we?

- 1.1. Portex Markets UK Ltd is an Appointed Representative of C B Financial Services Ltd with firm reference number 747538 and registered office address of The Wheel House, 2nd Floor, 133 High Street, Hurstpierpoint, West Sussex, BN6 9PU ("Portex")..
- 1.2. C B Financial Services Ltd is a global online broker providing trading facilities to retail and institutional investors in forex and CFDs on indices, commodities, energies, bonds and futures. C B Financial Services Ltd are authorised and regulated in the United Kingdom by the Financial Conduct Authority (FCA) and in South Africa by the Financial Sector Conduct Authority. The Company also has wholly owned subsidiaries based in Hong Kong and Dubai that are regulated respectively by the local regulatory body. The Company's head office is located at 20 Midtown, 20 Procter Street, London, WC1V 6NX.
- 1.3. Any reference to "we", "us", "our" refers to Portex
- 1.4. We respect each individual's right to privacy and we take your data security very seriously. We collect, store and use (collectively 'process') your information in accordance with all applicable UK and EU law.

2. Policy scope

This Policy applies to all data processing activities we carry out in electronic form (through websites or other applications we own) or where it is held in physical files.

3. Changes

We may change our Privacy Policy from time to time. We will notify you of changes or amendments via email, within the client portal and/or on the trading platform. You are expected to keep yourself up to date with any changes or new versions by visiting the privacy section on our website.

4. Our responsibility

Portex acts as a data controller for certain data processing activities and as a processor in relation to the services provided to clients under the agreement with C B Financial Services

Ltd. Accordingly, we share mutual responsibility for the collection, storage and use of your personal data.

5. Data we collect from our websites and other applications

- 5.1. If you visit our website, download mobile applications or other trading software owned or controlled by Portex, as an interested or existing client, partner, contractor, sub-contractor, or processor this Policy applies to you and is legally binding in addition to your contract (or agreement) with Portex where applicable.
- 5.2. By continuing to use our website or other services including, but not limited to, mobile applications such as provided through the Portex Academy and through the main Portex Academy site and educational Live Rooms you are agreeing to the collection, processing and use of your personal data by Portex.

6. Cookies

We and our partners may use third party cookies and other technologies in order to administer the websites and other applications and may collect your device information as well as your browsing activity. Please see our Cookie Policy for further details on this.

7. Third party links on the website(s)

Our website or applications may contain links to other sites such as social networking sites or Google Maps. If you click on a third-party link, you will be directed to that site. Please note that these external sites are not operated by us and we strongly advise you to review the privacy policy of these websites. We have no control over, and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

8. Information we collect from you, and the information you provide to us

- 8.1 In order to provide our services or information about our services to you, we may collect, store and use both 'personal' as well as 'special categories' data. Special categories are defined as personal data revealing racial or ethnic origin, or religious beliefs.
- 8.2 We may collect your information through several different sources, including, but not limited to:
 - Website forms and cookies
 - Live Help
 - Physical application forms
 - Over the phone or by email
 - Other third party processors or service providers for example if you sign up for our trading news, analysis and educational services through the Portex Academy

- Please note that the Portex Academy is a separate legal entity to Portex and we may share your data between the two companies in order for us to be able to provide the educational services that you have requested with your account at Portex
- From introducing partners, asset managers or fund managers
- Existing clients or employees
- Public authorities and law enforcement agencies

8.3 The type of data we collect along with the purpose for collection is listed below:

| Personal data type: | Purpose: |
|---|---|
| Personal information such as gender, name, date of birth and address | To meet our anti money laundering (AML) and other regulatory obligations in relation to Know Your Client (KYC) and client due diligence. To verify your identity using third party electronic verification processes. To register, administer or set up your demo and/or live trading account(s). To sign you up for any promotions, newsletters, surveys or other services as requested by you And we may collect information while conducting surveys in order to improve our services. |
| Contact information (email address and phone number) | In order to send you correspondence in relation to the services we provide and to fulfil our regulatory and compliance obligations. We may also use this information for direct marketing purposes. |
| Employment information, financial information, relevant education and trading experience | In order to comply with KYC obligations and in order to meet our regulatory obligations relating to assessing the appropriateness of our products and services |
| Ethnicity, citizenship and social security numbers or national identity and passport numbers | In order to comply with KYC, regulatory trade reporting and other AML obligations |
| Proof of photo ID, address verification | In order to comply with KYC, regulatory trade reporting and other AML obligations |
| Unique device number (IP address) and device information including version of web browser you use | When you visit our website, navigate through the pages or fill in any forms, we may collect your unique device number or IP address in order to set up your profile. Please see our 'Cookie Policy' for more information about how we store and use this information |
| Subscription preferences and how you use our emails | In order to manage or cease sending emails you should unsubscribe to our marketing promotions or other newsletters. We may also monitor whether you have opened/ read an email sent to you in order to improve our services and to collect information for marketing statistics |
| Financial sanctions and credit header information | In order to perform our electronic AML screening checks and to comply with other fraud detection policies. This may generate further information on your credit history, |

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| | criminal convictions or political interests leading to us making decisions based on the results of these checks |
| Activity log (search history or trading history) | To achieve marketing goals and learn user preferences. We may use this information for automated profiling and promoting products we deem suitable for you. Your trading history is used in order to comply with our regulatory monitoring requirements and to generate statistics for business analysis |
| Payment/ transaction details including history, card numbers, card copies | In order to execute transactions such as payments made to your trading account or fund withdrawals processed in relation to your trading or rebate account. Or, any other purchases you have made on our website |
| Call or voice recordings | We may record and store phone calls for training and monitoring purposes as well as to fulfill our regulatory record keeping requirements |
| Account password(s) (trading or client portal) including 'phone passwords' | We may collect or store this information for example when you request to set a specific password for your account(s) or you are unable to login to the client portal. Phone passwords are recorded and used in order to verify your identity and in order to execute instructions received for your account over the phone |
| Religious beliefs | We only request and process this information where you have requested an 'interest-free' trading account. Please refer to our 'Interest-free Account Policy' for more details |
| Information you share on social media | For the purposes of identity verification, and in order to comply with our KYC obligations |

9. Disclosure

9.1 We may pass your personal data on to companies, organizations or individuals contracted to Portex in the course of dealing with you. Any third parties that we share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide you on our behalf such as:

- i. The subsidiaries and staff located in C B Financial Services' regional support offices such as those assisting with account opening, compliance, other operations, marketing or technical team members; authorized and trained on handling personal information for the provision of back office or other financial services (including payments processing and/or purchase transactions);
- ii. The processors (individuals or companies) in contract with Portex in order to provide technical, compliance, regulatory, research, advertising, ancillary services and other administrative services including, but not limited to, liquidity providers, cloud service providers, data centers, regulators, auditors, independent financial advisors and legal representatives;

- iii. Portex is a separately legal entity to that of Portex Academy Ltd so your data may be shared between the two companies in order for us to be able to provide you with the educational services that we offer with an account.
- iv. Fund managers, appointed trader, brokers or partners (also known as 'Introducers' or 'Asset Managers') that have contracts with us and who introduced you to us and/or who you give permission to trade;
- v. Taxing authorities, law enforcement agencies or in order to protect our services, products, platforms or other systems;
- vi. We may also be approached by other processors or third parties to provide KYC documentation in order to fulfil their regulatory obligations or to carry out credit checks under AML, Countering Terrorist Financing and other fraud detection policies for example banks or payment service providers and we may do so under our legitimate interests in order that we comply with the applicable laws.

9.2 We will not sell, share with or transfer to third parties any information you provide except as set out in this Policy or other related policies linked herein.

10. Data transfers outside EEA

- 10.1 C B Financial Services Ltd has a global presence with representative offices located in the United Arab Emirates, Hong Kong and China.
- 10.2 We may have processors or partners in different countries around the world and therefore your personal data may be transferred, processed or used outside the EEA. As your data controller, we ensure that there are appropriate safeguards in place such as ensuring that all data processors are participants of the 'EU-US Privacy Shield' scheme if located in the US, otherwise bound by 'Model Contract Clauses' or 'Binding Corporate Rules' (for inter-group data exchanges) as appropriate.

11. How do we secure collection, processing and use of personal data?

- 11.1 We work hard to ensure our data processing activities are secured by following good industry practices, including, but not limited to:
 - i. Encrypting data during collection and transfers
 - ii. Restricting user access by roles and responsibilities
 - iii. Using complicated passwords for processing and storage systems
 - iv. Staff training and awareness
 - v. Annual data security and compliance audits
 - vi. Ensuring all processors and partners understand and comply with the data confidentiality requirements through contracts with us and/or C B Financial Services Ltd
 - vii. Making regular data backups

- viii. Systematic and secure destruction of unwanted or excessive data or the information (documents and records) that have passed their retention period, where practicably doable

12. Data accuracy and retention

We will endeavor to keep your information accurate and up to date, and not keep it for longer than is necessary. However, we are required to retain information in accordance with the law, for example, records under the AML regulations must be kept for a minimum of six years from the end of the relationship. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

13. Under what circumstances will we contact you?

- 13.1 Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. You may be contacted only in relation to a query you may have raised, services you have requested or signed up for, in relation to your trading account, direct marketing or in order to obtain information or KYC documents to fulfill regulatory obligations through routine compliance monitoring procedures.
- 13.2 Moreover, the information you provide will be subject to rigorous measures and procedures to minimize the risk of unauthorized access or disclosure.

14. Our legal basis for processing personal data

- 14.1 All data collected in accordance with this Policy is necessary for the performance of the contract or necessary to provide other services as requested by you from time to time.
- 14.2 As an online broker regulated by the FCA, C B Financial Services Ltd have strict rules and regulations to adhere to and therefore processing your data (including sensitive data) is often required to fulfil our legal obligations, when you make a specific request requiring sensitive data to be processed or in order to achieve other business objectives as regarded to be in the company's legitimate interest or that of the third parties contracted to us subject to rigorous assessment of risks to individuals' privacy.

15. Direct Marketing

- 15.1 Our legal basis for processing personal data for direct marketing purposes is of that legitimate business interest. If you are an existing client using our demo or live account services, we may, from time to time, send you promotions and other offers related to our products and services, market news or updates that we deem suitable for you.

- 15.2 We may also share your data with third parties for the purpose of marketing subject to ensuring that all parties contracted to us will safeguard your data and comply with data security principles as set forth in law.
- 15.3 Further to the above, in processing your data for marketing purposes, we will have assessed and mitigated the risks to data security and will have performed the balancing test between our legitimate business interest and your privacy.
- 15.4 If you do not wish to receive our direct marketing emails, you will be provided with an opt-out option at the point of collection of data. You can also amend the email preferences from within the client portal or simply click on the 'unsubscribe' link provided within the email.

16. Consent

If we require consent in order to provide any service or upon identifying a new purpose for processing, that is not stated within this Policy, we may contact you to seek consent from you. We will also confirm and ensure that the process for withdrawal of consent is in line with the requirements under the law.

17. Your rights as a data subject

- 17.1 At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:
- ✓ **Right of access** – you have the right to request a copy of the information that we hold about you.
 - ✓ **Right of rectification** – you have a right to correct data that we hold about you that is inaccurate or incomplete.
 - ✓ **Right to be forgotten** – in certain circumstances you can ask for the data we hold about you to be erased from our records – this is subject to any legal requirements that we may have for data retention in which instance, we reserve the right to continue to store your or use your data.
 - ✓ **Right to restriction of processing** – where certain conditions apply to have a right to restrict the processing.
 - ✓ **Right of portability** – you have the right to have the data we hold about you transferred to another organisation.
 - ✓ **Right to object** – you have the right to object to certain types of processing such as direct marketing.
 - ✓ **Right to object to automated processing, including profiling** – you also have the right to be subject to the legal effects of automated processing or profiling.
 - ✓ **Right to judicial review** - in the event that we refuse your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in the complaints section below.

17.2 All of the above requests will be forwarded on should there be a third party involved in the processing of your personal data.

18. Subject Access Request

At your request, we can confirm what information we hold about you and how it is processed. You can request this information in writing (by email or letter) or by completing our 'Subject Access Request' form, available on request. We may need to identify you in order to provide access to your data.

19. Breach notification

If any breach causes an unauthorized intrusion into our system that may affect you significantly, we will notify you as soon as practically possible and will take all necessary steps in order to avoid any such breaches from recurring.

20. Complaints

In the event that you wish to make a complaint about how your personal data is being processed by us (or third parties as described in the disclosure above), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority, the Information Commissioner's Office, and C B Financial Services Ltd's data protection representative:

Attn: Ashley Clarke
20 Midtown
20 Procter Street
London, W1CV 6NX
privacy@ofmarkets.com