

PRIVACY POLICY

Version 1.1 – April 2020

ConneXXion collects and processes your personal data obtained through the use of our Platform, including any data you may provide through the Platform and during your onboarding process to your account representative. Some information This Privacy Policy (the “**Policy**”) sets out the details of our collection and use of your personal data.

1. Controller

ConneXXion Markets is the controller and responsible for your personal data (the “**Company**”, “we, us” or our” in this Policy)

We have appointed a data protection officer (“DPO”) who is responsible for overseeing questions in relation to this Policy. If you have any questions about this Policy, including any request to exercise your legal rights, please contact the DPO using the details below.

Full name of legal entity: ConneXXion Markets Group Limited

Email address: tim.mccall@connexxionmarkets.com

Postal address: 37 Warren Street, London, W1T 6AD

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), which is the UK supervisory authority for data protection issues (www.ico.org.uk). However, we will aim to deal with any concerns you may have so please contact us in the first instance.

A list of other EEA data protection authorities is available at :

https://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080

2. Information that we collect or you provide

“**Personal Information**” means any information about an individual from which that person can be identified including “Sensitive Personal Information” (as defined in the E.U. General Data Protection Regulation) but does not include information that has been anonymised or aggregated.

We collect and use certain Personal Information in order to operate and provide you with access to the Platform and its Services. This includes Personal Information that you provide to us and Personal Information that we collect automatically when you visit or interact with the Services or the Platform.

(a) Information you provide

We collect Personal Information that you voluntarily provide to us when you access the Services. This information includes, without limitation: names, email addresses, telephone numbers and contact details, details of your current employer and other biographical information, any online preferences such as requests for particular alerts, and business information, such as your company name, role and industry.

It is important that personal data we hold is current and accurate. Please keep us informed if your personal data changes during your relationship with us. You can also contact your designated account representative at any time.

(b) Information we collect

We collect Personal Information about your use of the Services and the device you use to access the Platform, including the pages you request and visit, the messages you submit; information on your interaction with other Participants, information obtained in the course of supporting the Services, information about your internet use such as your IP address, your browser type, your operating system and your internet service provider. If you access the Platform via a mobile device, we may also collect information about your mobile provider and type of device.

We (and our service providers) use different technologies to collect information, including cookies. Cookies are data files stored on your hard drive or device memory that can help us count visits and see which areas of our Platform are most popular to help us improve our Services.

3. How Personal Information is used

We use the Personal Information we collect to provide, maintain and improve the Services and Platform. We also use Personal Information to:

- a. We need to use your Personal Information to perform any obligations to you pursuant to the contract in place between us;
- b. We have a legitimate interest in processing your Personal Information e.g. to send you marketing communications or to communicate changes about the Services or Platform;
- c. We have to process your Personal Information to comply with our legal obligations;
- d. We have obtained your consent to do so. If this is the legal basis for our processing, you are entitled to withdraw your consent at any time.

4. How Personal Information may be shared

We may have disclosed your Personal Information for the following business purposes or as otherwise described herein:

- With our service providers (including contractors and designated agents); our insurers and/or professional advisers to manage risks and/or legal disputes or for auditing purposes;
- To cooperate with public and government authorities and law enforcement and to respond to their request or provide them with information they have requested or require;
- For other legal reasons such as monitoring compliance with our Rules, to protect our rights, privacy, safety or property and/or that of you or others, to protect against fraud, crime, illegality activity, anti-terrorism or anti-money laundering and for risk management purposes;
- In connection with a sale or business transaction, for example, to an acquiring entity or investor and its advisors in the event of any sale, joint venture, assignment transfer or other disposition of all or any portion of our business, assets or stock

We require third parties to respect the security of your Personal Information and to treat it in accordance with applicable law.

We may also share aggregated or de-identified information that cannot reasonably be used to identify you to help with our Services, Platform and content that are tailored to user of the Service and for other purposes.

5. Security

We aim to use reasonable physical, electronic and procedural measures to protect Personal Information within our organization from loss, theft, unauthorised use, disclosure or modification. However, no data transmission over the internet can be 100% secure. As a result, whilst we do our best to protect your information, we cannot guarantee its security.

6. Your rights

You may have certain rights with respect to the Personal Information we hold about you, including the right to:

- a. Request access to your Personal Information. This enables you to receive a copy of the Personal Information we hold and for you to check we are processing it lawfully;
- b. Request correction of the Personal Information we hold about you. This enables you to have any incomplete or inaccurate information corrected;
- c. Request deletion of your Personal Information. This allows you to request a deletion of your Personal Information where there is no good reason for us to keep processing it or where you have exercised your right to object to such processing;
- d. Object to processing of your Personal Information where we are relying on a legitimate interest and there is something about your situation which makes you want to object to our processing on this legal basis;
- e. Request a restriction of processing of your Personal Information which enables you to request a suspension of our processing of your Personal Information;
- f. Request the transfer of your Personal Information to another party.

Note that we may need to verify your identity before implementing any request hereunder. We also draw your attention to the fact that we may need to retain certain information for recordkeeping purposes and/or to complete transactions that you began prior to requesting a change or deletion but we will aim to comply with your request as soon as reasonably practicable.

7. Data Retention

We retain Personal Information as long as needed but where we no longer have an ongoing relationship with you, we store your Personal Information for a maximum of 10 years following the termination of such relationship.

8. Changes to this Policy

From time to time, we may update this Policy. Changes might be made, without limitation, as a result of a change in law or regulation, change to the scope of our Services or to reflect market practice. When we update this Policy, you will be able to tell by the date at the beginning of the Policy. Any changes to this Policy will become effective when we post the revised Policy on the Platform.