

## **Privacy Policy**

### **1. Introduction**

Select Financial Services Limited (“**Select FX**”, “**we**”, “**us**” or “**our**”) is committed to protecting and respecting your privacy.

As part of our normal business operations, we collect certain personal information from our clients. This notice sets out the basis on which we process any such personal information that we collect or that you provide to us. Please read this notice carefully to understand our practices regarding your personal information.

This Privacy Notice will help you understand what data we collect about you, why we collect it and what we do with it. This Notice also explains how we store and use your personal data when you use or interact with our website, or where we otherwise obtain or collect your personal information, whether obtained directly from you or from other sources.

### **2. Select FX’s Contact information**

For the purposes of the Data Protection Act 2018, the UK General Data Protection Regulation and the EU General Data Protection Regulation (the “**Regulation**”):

#### **Data Controller**

Select Financial Services Limited

Telephone: +44 (0) 204 524 4476

Email: [info@selectfx.co.uk](mailto:info@selectfx.co.uk)

#### **Data Protection Officer**

Jacob Bellieu-Cruse

Data Protection Officer, Select Financial services Limited

Telephone: +44 (0) 204 524 4475

Email: [info@selectfx.co.uk](mailto:info@selectfx.co.uk)

### **3. The type of information we collect**

We may collect and process the following data about you:

#### **3.1 Information you give us through the use of our Site or our services.**

You may give us information about you by filling in forms on our Site or by corresponding with us by phone, email or otherwise. This includes information you provide when you register to use our sites, subscribe to our services, place an order or transact on our Site or report a problem with our Site.

The information you give us may include:

- Contact information, such as your name, address, email address and phone number
- Identification information, such as certified identity documents, proof of address or business documentation including your personal details
- Financial and credit information

You may give us information relating to beneficiaries, shareholders, trustees and directors to enable us to deliver our services. This may be through filling in forms on our Site or by corresponding with us by phone, email or otherwise. You must obtain appropriate consent from any third party before disclosing such information to us. The information you give us may include their name, address, email address and phone number, financial and credit information.

You may give us information relating to other accounts held by other financial institutions to enable us to deliver our services. This may be through filling in forms on our Site or by corresponding with us by phone, e-mail or otherwise. The information you give us may include the bank code, the bank country, the type of account, the name of the bank and the account number.

#### **3.2 Information we collect about you when you use our Site.**

With each visit to our Site, we may collect the following information:

- technical information, including the internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our Site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.

### 3.3 Information we receive from other sources when delivering our services.

- We may receive information about you if you use any other services we provide. This data may be shared internally and combined with data collected on this Site.
- We also work closely with third parties (including, for example, introducers, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

Where we receive information we will ensure this will be in full compliance of the Regulation.

## 4. Cookies

We follow the “Express Consent” basis for processing cookies. The first time you visit our Site, we will inform you of the cookies we use and provide opt-in options which states your consent for us to use cookies. Some cookies are strictly necessary for the operation of our Site.

A cookie is a very small text file placed on your computer, that allows us to distinguish you from other users of our Site. These cookies help us to provide you with a good experience when you browse our Site. We use the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our site. They include, for example, cookies that enable you to log into secure areas of our Site.
- **Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our Site when they are using them. This helps us to improve the way our Site works, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality cookies.** These are used to recognise you when you return to our Site. This enables us to personalise our content for you, by remembering your preferences (for example, your choice of language or region).

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

You may block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our Site.

## 5. How We use your information

### 5.1 Information you give to us

We will use this information as recognised by and in compliance with the applicable data protection laws:

- to carry out our obligations arising from any contracts entered into between you and us and to provide you with information, products and services that you request from us;
- to carry out our obligations arising from any contracts entered between us and third parties relating to the services provided to you, such as
  - Your information will only be used in these circumstances in the performance of entering into a contract with you;
  - where there is a defined legitimate interest, for the purpose of monitoring the contractual relation between us and the third parties involved in the relationship with you; and
  - when the processing is in Select FX's or some other party's legitimate interests, and these interests are not overridden by your interests or rights in the protection of your personal data. This may include processing your data for (i) identification or prevention of suspicious or high-risk transactions or fraudulent activity, internal research, and analytics assessments, (ii) for purposes of communication with you and (iii) informing you about new products and services we are offering or to promote new products and services of other parties which we think may be of interest to you. Before we process your personal data to pursue our legitimate interests for the purposes outlined in this policy, we determine if such processing is necessary, and we carefully consider the impact of our processing activities on your fundamental rights and freedoms. On balance, we have determined that such processing is necessary for our legitimate interests and that the processing which we conduct does not adversely impact on these rights and freedoms.
- to provide you with information about other products and services we offer;
  - where you are an existing private customer, we will only contact you with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you.
  - where you are a new private customer, we will contact you only if you have consented to this. If you do not want us to use your data in this way, please tick the relevant box situated on the form on which we collect your data.
  - where you are a corporate/business customer, we will contact you where We have identified a legitimate interest in relation to the services We offer and your business.

- you may withdraw this consent at any time by using the links provided at the bottom of marketing emails from us, or by contacting our Data Protection Champion.
- to notify you about changes to our service;
- respond to any enquiry you have made through our Site, or via phone, e-mail or otherwise.
- to comply with legal obligations as a data controller and regulated business. This includes:
  - using personal information needed to comply with legal and regulatory obligations related to anti-money laundering and counter-terrorism financing;
  - detecting, preventing and prosecuting fraud or theft, as well as preventing illegitimate or prohibited use of our services or other illegal or wrongful activity.
  - monitoring and reporting compliance issues.
  - using your personal information to validate and authenticate your identity, and utilising third parties to help us do so.
- where required to protect your vital interests or that of another natural person.
- where performing tasks carried out in the public interest or in the exercise of official authority invested in us.

## **5.2 Information we receive from other sources.** – We will use this information:

We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above.

## **5.3 Information we disclose about you**

We may share your information with selected third parties; where this is necessary, we are required to comply with all aspects of the Regulation. The following are the types of organisations we may share some of your personal information with:

- Business partners, suppliers, and sub-contractors for the performance of any contract we enter into with them or you.
- Analytics and search engine providers that assist us in the improvement and optimisation of our Site.
- Credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering a contract with you.
- Police and law enforcement agencies, where required to do so by law.

## **6. Where we store your personal information**

The data that we collect from you may be transferred to, and stored at, a destination outside the United Kingdom (“**UK**”). It may also be processed by one of our suppliers. If these transfers are needed, they will be done in full compliance of the Regulation.

Specifically, we may transfer your data to the European Economic Area (“**EEA**”).

Where data is transferred to another jurisdiction this is done so under relevant data protection laws, supported using the International Data Transfer Agreement addendum or Binding Corporate Rules for transfers to Select FX.

All your personal information will be afforded a high level of protection wherever it is processed and no matter whether it is held by us, or our contractors or agents.

All information you provide to us is stored under our control. Any payment transactions will be encrypted. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the

security of your data transmitted to our Site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Should you have particular concerns about a method of data transmission, we will take reasonable steps to provide an alternative method.

## **7. Your rights**

You may contact our Data Protection officer, [Info@selectfx.co.uk](mailto:Info@selectfx.co.uk) to exercise your rights. When exercising your rights, we will always inform you of any lawful reason that may require us to continue processing your data.

You have the right to request from us information about whether we process your personal information, and ask questions about how we collect, store and process that information.

You have the right to access free information about the personal information we hold about you, whether this is transferred to a third country or international organisation and the associated safeguards.

You have the right to receive any personal data we hold about you in a commonly used and machine-readable format.

You have the right to request an update to any of your personal information which is out of date or incorrect. In addition, our Sales team will review and confirm the accuracy of your personal detail on at least a 6 monthly basis.

Where information we hold is not accurate or is incomplete, you have the right to request we correct such information, and we will do so without undue delay.

You have the right to request that we delete any data we process about you, where the processing is no longer necessary.

Where you have previously provided consent for our processing of your data, you have the right to remove that consent and for us to stop processing your data specific to that consent. You also have the right to object to our processing of your data.

## **8. External Sites**

Our Site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal information to these websites.

## **9. Retaining your Data**

We keep your personal information for no longer than necessary for the purposes for which the personal information is processed. The length of time for which we retain personal information depends on the purposes for which we collect and use it and/or as required to comply with applicable laws and to establish, exercise or defend our legal rights. As a minimum, we will retain your personal data for the duration of our engagement with you, and for a period of 6 years on termination of your engagement with us, unless we have any other legal basis for retaining such information.

Fraud prevention agencies can hold your personal data for different periods of time, and if you are considered to pose a fraud or money laundering risk, your data can be held for up to 6 years.

## **10. Changes to Our Privacy Policy**

This Notice was last updated in June 2025. Any changes we may make to our Privacy Notice in the future will be posted on this page, and where appropriate, notified to you by email. Please check back frequently to see any updates or changes to our Privacy Notice.

If you have any questions, concerns, or complaints about our Privacy Notice, or how we manage your personal data, please contact us by email at [complaints@selectfx.co.uk](mailto:complaints@selectfx.co.uk).