



Customer Platform Privacy Policy

Platform Privacy Policy

1. Introduction

At TradingHub Group Limited (“**we**”, “**our**”, “**us**” or “**TradingHub**”) we are committed to providing products and services to organisations (“**Customers**”) that meets their business needs, their representatives who use the Platform (“**Users**”) and the individuals whose personal data is analysed by the Platform (“**Traders**”).

This **Privacy Policy** explains how we collect and process personal data held about Users and Traders (collectively “**you**”) while you use our products and services on our financial markets analytics platform (the “**Platform**”).

2. Who we are

We are a data processor in relation to the personal data that we collect, use or hold about Users and Traders. The Customer to whom we provide our products and services is the data controller and as such is responsible for protecting it in line with data protection laws. We also process personal data about the Customer’s Traders whose trade data the Platform analyses.

As required by applicable data protection laws we have appointed Symmetry Solutions Ltd (“**Symmetry**”) as our data protection representative in the EU.

3. How and when we collect your personal data

We collect personal data about you from a variety of sources, including:

- a. if you are a User of the Platform, from information we generate about you during our relationship with you such as when you visit and use the Platform and personal data collected from cookies and other similar technologies which are described in our Platform Cookies Policy; and
- b. if you are a Trader, from information about you contained in trade data provided by our Customers.

We collect the following personal data that is **generated during our relationship with you**:

- a. **Technical Information collected from your computer or other device:** this may include information about your use of our Platform including details of your logins and the resources that you access. Such information includes traffic data, login data, data you download from the Platform and information about your use of our platform including details of your visits and the resources that you access.
- b. **Profile data:** where applicable this includes email address, full name, username and password for the Platform.

We collect the following personal data from **our Customers**:

- a. in order to access the Platform, the Customer may provide us with your personal details and contact information.
- b. **Trade data:** the Customer may provide us with your personal data when they submit trade data, including, as applicable and without limitation:

- a. Trader name;
- b. Trader ID;
- c. Trader email address;
- d. Trader location; and
- e. communications data.

4. How we use your personal data and the legal basis on which we use it

Purpose	Activity	Legal Basis
<p>To operate our business and our Platform, we use the following personal data of Users and Traders:</p> <ul style="list-style-type: none"> • Personal Details and Contact Information • Information generated about you including Technical Information • Trade Data uploaded to the Platform (to the extent that Personal Data is contained therein) 	<p>We use your personal data to ensure we can run our business. For example, by enabling you to use our Platform.</p> <p>We also use the personal data of Users and Traders to satisfy legal or regulatory requirements to which we are subject and in order to exercise and protect our legal rights. For example, to detect, prevent and respond to:</p> <ul style="list-style-type: none"> • fraudulent activity and claims; • intellectual property infringement claims; and • violations of law or our terms of use. <p>We also use your personal data to administer and maintain our Platform, we use “cookies” to monitor Platform logins.</p>	<p>This is so that:</p> <ul style="list-style-type: none"> • We can comply with our contractual obligations with the Customer; • We can comply with regulatory requirements and legal obligations to which we are subject (whether by a regulatory authority or a court order) to conduct certain checks and disclose personal data; and • We can exercise our legitimate interests and the legitimate interests of our business in operating our business in an efficient, safe and lawful way and to protect it from fraudulent or other unlawful activity.
<p>To improve our business, we use the following personal data of Users:</p> <ul style="list-style-type: none"> • Personal details and Contact Information • Information generated about 	<p>We analyse information about your use of and feedback on our Platform, and any changes you make to amend or resolve an alert or change the configuration of certain parameters, to provide an improved experience.</p> <p>We may use your personal data:</p>	<p>This is so that we can exercise our legitimate interests to conduct research and analytics in relation to the improvement of our business and our Platform.</p>

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<p>you including Technical Information</p>	<ul style="list-style-type: none"> • To administer and protect our business and our Platform. • To use data analytics to improve our Platform, products and services, marketing, customer relationships and experiences. • To ensure network security. 	
<p>To communicate with you, we use the following personal data of Users:</p> <ul style="list-style-type: none"> • Personal details and Contact Information 	<p>We may use your personal data when we communicate with you, for example, if you contact us with questions about any products, services or our business in general.</p> <p>This helps us:</p> <ul style="list-style-type: none"> • To manage our relationship with you. • To comply with the terms of our Customer agreements. • To keep our records updated. • To inform you of any changes to our services or goods and products. • To provide information to you that you request from us relating to our products or services. 	<p>It is in our legitimate interest that we are able to respond to your queries in an appropriate and personalised way and also assist you with your experience with us. Also, it is in our legitimate interest to provide you with relevant information about our products, services and/or business.</p>
<p>To recover amounts due to us, we use the</p>	<p>We may use your personal data to contact you when amounts are due to us from the Customer.</p>	<p>It is in our legitimate interest that we are permitted to use your personal data to recover amounts due to us.</p>

<p>following personal data:</p> <ul style="list-style-type: none"> • Personal details and Contact Information 		
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5. Change of purpose

We will only use your personal data for the purposes for which we collect and/or receive it, unless we reasonably consider that we need to use it for another purpose which we believe is compatible with the original purpose.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, where this is required or permitted by law.

6. Storing Your Personal Data

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

We will only retain your personal data for as long as necessary to fulfil the purposes for which we collected it considering the amount, nature and sensitivity of the data, the potential risk of harm from unauthorised use of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means and the applicable legal requirements. In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

7. International Data Transfers

TradingHub has offices in London and other jurisdictions outside of the UK and EU and so processing of your personal data may involve a transfer of data outside the UK and EU. We will always ensure that appropriate safeguards are put in place to protect your personal data and where we do transfer your personal data outside of the UK and EU we will ensure an adequate level of protection is afforded to it.

We may also transfer personal data to our third-party suppliers. Where the transfers are not to countries that provide an adequate level of protection, as we do with our own group companies, we put appropriate safeguards in place to cover these transfers. For example, in the form of standard contractual/data protection clauses.

Please contact us if you would like further information on the safeguards used by us when transferring your personal data out of the UK or EU including for a copy of the safeguards for international transfers.

TradingHub's subcontractors / subprocessors are listed below:

- Amazon Web Services – cloud provider;

- Swisscom (Switzerland) Ltd (where requested by a Customer);
- Georgios Tsounis (TIN 035542403) (where required);
- TradingHub group companies:
 - o TradingHub Pte. Limited (Singapore);
 - o TradingHub International LLC (United States);
 - o TradingHub Canada Limited (Canada); and
 - o TradingHub Australia Pte Limited (Australia).

8. Disclosing Your Information

We may share your personal data with third parties under the following circumstances:

- a. To organisations that help us operate and improve our business and provide our services, such as:
 - Professional services providers and Platform hosts who help us run our business;
 - Law enforcement and fraud prevention agencies, so we can help tackle fraud; and
 - Governmental bodies and regulators to comply with our legal obligations.

Further details about the specific third parties we engage can be provided on request.

- b. Group Companies

- We are part of the TradingHub group and as such have offices and operations in a number of international locations. In order to provide you with the services, we share information between our group companies to provide our products and services and for business and administrative purposes. In some cases for service provision or for business and administrative purposes, we will share your personal data within the corporate group on a need to know basis only.

- c. As required by law

- Where required or permitted by law, information may be provided to others, such as regulators and law enforcement agencies.

- d. In the context of a transaction

- From time to time, we may consider corporate transactions such as a merger, acquisition, reorganisation, asset sale, or similar. In these instances, we may transfer or allow access to information (including personal data) to enable the assessment and undertaking of that transaction. If we buy or sell any business or assets, personal data may be transferred to a third parties involved in the transaction.

9. Your Legal Rights

You have rights under data protection laws in relation to the processing of your personal data. Some of these rights that may be applicable are as follows:

- **Right to be informed:** You have the right to be informed about the collection and use of your personal data (as described in this Privacy Policy);
- **Request access to a copy of your personal data** (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you.
- **Request correction of your personal data.** This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

- **Request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where we may have processed your information unlawfully or where we are required to erase your personal data to comply with law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing.** You have the right to object to our processing of your personal data where we are relying on your consent to process your data and you withdraw your consent or where we are relying on legitimate interests (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have legal grounds to process your information which override your rights and freedoms. Where you withdraw your consent to processing, we may not be able to provide certain products or services to you and your withdrawal of consent will not affect the lawfulness of any processing carried out before you withdraw your consent.
- **Request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; or (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- **Request the transfer of your personal data.** We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format.
- **Rights Related to Automated Decision Making and Profiling:** You have the right not to be subject to decisions based solely on automated processing, including profiling, which produce legal effects or similarly significantly affect you.
- **Right to Withdraw Consent:** You have the right to withdraw their consent to the processing of their personal data at any time if that is the legal basis relied on to process your personal data. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal and does not affect other processing where the legal basis relied on was not consent.
- **Right to complain directly to us:** You have the right to complain directly to TradingHub about how we have handled your personal data. We encourage you to contact us in the first instance before escalating any complaint to a supervisory authority. Please see Section 10 below for details of how to submit a complaint to us and how we will handle it.

Please contact us if you wish to exercise any of these rights. We may need to request specific information from you to help us confirm your identity and ensure your right to exercise your rights. We aim to respond to all requests within one month, though occasionally it may take us longer, in which case we will notify you and keep you updated. You will not have to pay a fee to access your personal data (or exercise any of your other rights), however we may charge a reasonable fee or refuse to comply if your request is clearly unfounded, repetitive or excessive.

10. Right to lodge a complaint

Complaining directly to us

If you have any questions or concerns about this Privacy Policy, or wish to make a complaint about how we have handled your personal data, you have the right to complain directly to TradingHub. We encourage you to contact us in the first instance before escalating any complaint to a supervisory authority.

How to submit a complaint to us

You can submit a data protection complaint to us through any of the following channels:

- **Email:** privacy@tradinghub.com
- **Post:** FAO The Data Protection Officer, TradingHub Group Limited, 2nd Floor, 5 Aldermanbury Square, London EC2V 7HR

- **Telephone:** +44 (0) 20 3793 9662

You may also raise a complaint with any member of our staff, and it will be passed to the appropriate person for handling.

How we will handle your complaint

We will acknowledge receipt of your complaint within 30 days of receiving it. We will investigate your complaint and aim to provide you with a full response within a reasonable period (generally within 30 days of acknowledgement), though occasionally it may take us longer, in which case we will notify you and keep you updated.

Escalation to a supervisory authority

If you are not satisfied with our response, or if we fail to respond within a reasonable time, you have the right to escalate your complaint to the relevant data protection supervisory authority. Such authorities include:

- **UK:** the Information Commissioner's Office (ICO) — www.ico.org.uk
- **EU:** your local data protection authority. A list of EU DPAs can be found at: https://edpb.europa.eu/about-edpb/about-edpb/members_en

11. Modifications to Policy

We keep our privacy policy under regular review. TradingHub reserves the right to change this Policy at any time by posting revisions on the Platform. Such changes will be effective upon posting.

12. Contact us

If you have any queries, you can contact us at:

Email: customersupport@tradinghub.com

Post: FAO Customer Support
TradingHub Group Limited
2nd Floor, 5 Aldermanbury Square
London EC2V 7HR
United Kingdom

Our Data Protection Officer ("DPO") is responsible for ensuring the protection of your personal data and ensuring compliance with data protection laws. You can contact our Data Protection Officer at:

Email: privacy@tradinghub.com

Post: FAO The Data Protection Officer
TradingHub Group Limited
2nd Floor, 5 Aldermanbury Square
London EC2V 5HR
United Kingdom

For those in the EU, you may contact our EU Representative at:

Email: tradinghub@symmetrygroup.ie

Post: FAO TradingHub EU Rep
Symmetry Solutions Ltd
The Tara Building
11-15 Tara Street
Dublin 2, D02RY83 Ireland