

Website Privacy Policy



Website Privacy Policy

1. Introduction

At TradingHub Group Limited (“we”, “our”, “us” or “TradingHub”) we are committed to safeguarding and preserving the privacy of our visitors. This **Privacy Policy** explains how we collect and process personal data that you provide to us, or that we collect from you while you visit our Website (“**Website Visitor**” or “**you**”) www.tradinghub.com (our “**Website**”).

2. Who we are

We are the data controller in relation to the personal data that we collect, use or hold about you and we are responsible for protecting it in line with data protection laws.

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. from you directly when you contact us for support, have a query about our products or services or our business in general;
- b. from information we generate about you during our relationship with you such as when you visit our Website and personal data is collected from cookies and other similar technologies which are described in our [Website Cookies Policy](#);
- c. from information we collect about you from other sources, such as HubSpot for analytics about your usage of our Website and social media. This includes commercially available sources too, such as public databases (where permitted by law).

4. What we collect

We collect the following personal data from you directly:

- a. **Personal details and contact information:** you may provide us with personal data when you inquire about us. This may include name, date of birth, title, marital status and gender and contact data including address, email address and telephone number. This includes any information provided voluntarily by you. For example, when you register for information.
- b. **Communication information:** Information that you provide when you communicate with us by any means.

We collect the following personal data **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 Website including details of your visits such as pages viewed and the resources that you access. Such information includes traffic data, location data, IP address, login data, browser type and version, operating system and platform, other information about the operating system used on the devices you use to access our website, (e.g. Android or iOS) information about your use of our site including details of your visits and the resources

that you access including page views, sessions, new visitors, returning visitors, traffic sources, and bounce rate. We collect the following information from **other sources**, such as:

- a. **reCAPTCHA:** We use reCAPTCHA by Google on this Website to fight spam and abuse. Your use of reCAPTCHA is subject to Google's Privacy Policy and Terms of Use, found at <https://policies.google.com/privacy?hl=en-US> and <https://policies.google.com/terms?hl=en-US> respectively.
- b. **Publicly available** information received from third parties such as search information providers or from publicly available sources as required for identity verification purposes via Google and social media e.g. gender, country you are located in.

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

Purpose	Activity	Legal Basis
<p>To operate our business, we use the following personal data of Website Visitors:</p> <ul style="list-style-type: none"> • Personal Details and Contact Information • Information generated about you including Technical Information • Information from other sources 	<p>We use your personal data to ensure we can run our business.</p> <p>For example, by enabling you to browse our Website.</p> <p>We also use the personal data of Website Visitors 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 Website, we use "cookies" to monitor Website Visitor traffic patterns and site usage. This helps us to understand how you use our Website so that we can develop and improve the design, layout and functionality of the sites.</p>	<p>This is so that:</p> <ul style="list-style-type: none"> • We can comply with regulatory requirements and legal obligations 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 and operating our business in an efficient, safe and lawful way and protect it from fraudulent or other unlawful activity.

<p>To improve our business, we use the following personal data of Website Visitors:</p> <ul style="list-style-type: none"> • Personal details and Contact Information • Information generated about you including Technical Information • Information from other sources 	<p>We analyse information about your use of and feedback on our Website to provide an improved customer experience.</p> <p>We may use your personal data :</p> <ul style="list-style-type: none"> • To administer and protect our business and our Website. • To use data analytics to improve our website, products and services, marketing, customer relationships and experiences. • To ensure network security. 	<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 Website.</p>
<p>To communicate with you, we use the following personal data of Website Visitors and customer representatives:</p> <ul style="list-style-type: none"> • Personal details and Contact Information • Information from other sources • Recording and transcription (if applicable) 	<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 keep our records updated (including records of meetings). • To inform you of any changes to our website, services or goods and products • To provide information to you that you request from 	<p>It is in our legitimate interest that we are able to respond to, and maintain a record of, 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>

	us relating to our products or services.	
To inform you about promotions and our products and services, we use the following personal data of Website Visitors: <ul style="list-style-type: none"> • Personal details and Contact Information • Information from other sources 	We use your personal data to better understand your preferences and to personalise the messages we send to you. This includes sending you information by email and/or post about our products and services, as well as news or events that may be of interest to you.	This is on the basis of your opt in consent and you may opt out at any time.

If you have previously purchased goods or services from us, TradingHub may provide to you details of similar goods or services, or other goods and services that you may be interested in. Please let us know if you wish to opt out of marketing communications using the contact details below. Where you opt out of marketing communications, please note we will still communicate with you regarding the provision of the products and services that you have requested.

6. Change of purpose

We will only use your personal data for the purposes for which we collected 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.

7. 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.

8. 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 Client)
- 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).

9. 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 service providers, such as marketing and research agencies, profile and behavioural analytics companies and website hosts who help us run our business.
- b. Further details about the specific third parties we engage can be provided on request.
- c. 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.
- d. As required by law
 - Where required or permitted by law, information may be provided to others, such as regulators and law enforcement agencies.
- e. 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.

10. Third Party Links

On occasion TradingHub may include links to third parties on our websites. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. Where we include a link

it does not mean that we endorse or approve that site's policy towards visitor privacy. You should review their privacy policy before sending them any personal data.

11. 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 Website 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.

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.

12. Right to lodge a complaint

If you are not satisfied with the response that we give in relation to your questions on how we are processing your personal data, then you have the right to make a complaint at any time to a data protection supervisory authority. Such authorities include:

- the Information Commissioner's Office (**ICO**) who the UK supervisory authority for data protection issues (www.ico.org.uk); or
- your local data protection authority. A list of the EU DPA's can be found here: https://edpb.europa.eu/about-edpb/about-edpb/members_en

13. 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 our Website. Such changes will be effective upon posting.

14. Contact us

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

Email: marketing@tradinghub.com

Post: FAO The Marketing Department
TradingHub Group Limited
2nd Floor, 5 Aldermanbury Square,
London EC2V 7HR

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 7HR

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