

Privacy Policy

Last updated: June 2026

Privacy Policy

1. Introduction

At TradingHub we are committed to safeguarding and protecting your privacy.

This **Privacy Policy** explains how TradingHub Group Limited and its group companies (“**we**”, “**our**”, “**us**” or “**TradingHub**”) collect, hold, use, disclose, and process personal data that you provide to us or that we collect from you, including while you visit our Website (“**Website Visitor**” or “**you**”). It also explains what privacy rights you may have, and how to exercise them.

We may also provide you with a privacy collection notice or privacy statement when we collect personal data about you, for example when you apply for a role with us. Such notices or statements may set out additional information about the ways we will handle your personal data in specific situations.

2. Who we are

TradingHub is headquartered in London and provides industry-leading trade surveillance solutions. We operate internationally and have subsidiaries in Australia, Canada, the United States and Singapore.

Depending on your location and the applicable data protection laws, we generally act as 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 if you contact us via social media. This includes commercially available sources too, such as public databases (where permitted by law).

If you are a trader, we may also collect personal data about you from representatives of our customers that use our financial markets analytics platform (the “**Platform**”) to perform our functions and activities.

4. What we collect and hold

We collect the following types of 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 your 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 to receive information.
- b. **Communication information:** Information that you provide when you communicate with us by any means.

- c. **Employment information:** If you apply for a role with us, this may include details of your employment history, information about your education, skills and qualifications, your working eligibility rights, your suitability for the role you are applying for, details about your referees and any other information provided as part of the recruitment process. If you are successful in applying for a role we will collect additional information in relation to your employment with us (for example your tax file number). For more information, see our candidate / employee privacy notices.

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 installed 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 also collect the following information from **other sources**, such as:
 - a. **reCAPTCHA:** We use reCAPTCHA by Google on our 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. the country you are located in.

We do not generally collect sensitive information about individuals. If we do need to collect sensitive information about you, we will only do so with your consent or where we are required or permitted to do so by law.

In some cases, you may provide us with personal data which relates to another person. If you do so, you agree that you have received permission from that individual for us to collect, use and disclose their personal data in accordance with this Privacy Policy. You should also let them know about our Privacy Policy.

You are under no obligation to provide your personal information to TradingHub. However, without certain information about you, we may not be able to provide our services to you, or we may be limited in how we can interact with you.

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 	<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</p>	<p>This is so that we can:</p> <ul style="list-style-type: none"> • comply with regulatory requirements and legal obligations to which we are subject (whether by a regulatory authority or a court order) to conduct

<ul style="list-style-type: none"> Information generated about you including Technical Information Information from other sources 	<p>regulatory requirements to which we are subject and 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>certain checks and disclose personal data; and</p> <ul style="list-style-type: none"> 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 operate our Platform, we may collect the following types of personal data:</p> <ul style="list-style-type: none"> Customer contact information; Trader name; Trader ID; Trader email address; Trader location; Technical information regarding the use of our Platform; and Communications data. 	<p>We use personal data to enable the use of our Platform by our customers and their representatives.</p> <p>We also use this data to administer and maintain our Platform and we use “cookies” to monitor Platform logins.</p> <p>We also use personal data of traders and users of the Platform to satisfy legal or regulatory requirements to which we are subject and in order to exercise and protect our legal rights.</p> <p>For more information about how we handle personal information that we</p>	<p>This is so that we can:</p> <ul style="list-style-type: none"> comply with our contractual obligations; 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 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 against

	<p>collect in connection with our Platform, please refer to our Platform Privacy Policy.</p>	<p>fraudulent or other unlawful activity.</p>
<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 	<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>

	<ul style="list-style-type: none"> To provide information to you that you request from us relating to our products or services. 	
<p>To manage your application to work with us, we may use the following personal data about you:</p> <ul style="list-style-type: none"> Personal Details and Contact Information Employment Information 	<p>We may handle this information to:</p> <ul style="list-style-type: none"> verify your identity; consider your suitability as a prospective employee; and manage our working relationship with you. <p>For more information about how we handle information in connection with our recruitment process, please refer to our Candidate Privacy Notices.</p>	<p>This is so that we can exercise our legitimate interests to maintain personnel records, good employment practice, and maintain a talent pool.</p>
<p>To inform you about promotions and our products and services through direct marketing, we may use the following personal data of Website Visitors:</p> <ul style="list-style-type: none"> Personal details and Contact Information Information from other sources 	<p>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. If you have previously purchased goods or services from us, TradingHub may provide you with details of similar goods or services, or other goods and services that you may be interested in.</p>	<p>This is on the basis of your opt in consent and you may opt out at any time. You can opt out or let us know if you wish to opt out of marketing communications by using the contact details below or by using the unsubscribe mechanism in the relevant communications. Where you opt out of, or unsubscribe from marketing communications, please note we will still communicate with you regarding the provision of the products and services that you have requested or if we are required or permitted to by law.</p>

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 and related 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 and Securing Your Personal Data

We take reasonable steps (through appropriate technical and organisational 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. We take steps to ensure that they will only process your personal data on our instructions and that 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 data 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, or as required to comply with any applicable legal obligations. When we no longer require your personal data (and in accordance with any applicable laws), we will take reasonable steps to delete, destroy or de-identify your personal data.

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. 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.

You can see the list of our subcontractors and subprocessors and where they are located 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 Pty Limited (Australia).

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. International Data Transfers

As noted above, TradingHub has offices in London and other jurisdictions outside of the UK and EU. If you are based in the UK or EU, processing of your personal data may involve a transfer of data outside the UK or EU (as applicable). If you are based in Australia, some of the parties that we may disclose, transfer or share your personal data with may be located outside of Australia.

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 jurisdiction in which you are located we will ensure an adequate level of protection is afforded to it.

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, this may be 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, including for a copy of the safeguards for international transfers.

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 third party's policy towards visitor privacy. You should review the relevant privacy policy before sending or sharing any personal data.

11. Your Legal Rights

Depending on where you are based, you may have additional rights under data protection laws in relation to the processing of your personal data. Some of the 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 request 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 may 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 may 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.** This right requires us to 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 may 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 may have the right to withdraw your consent to the processing of your 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 12 below for details of how to submit a complaint to us and how we will handle it.

Please contact us using the details below in section 12 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 entitlement to exercise the relevant rights. We aim to respond to all requests within a reasonable period (generally 30 days), though occasionally it may take us longer, in which case we will notify you and keep you updated. In most circumstances, 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 or if we are otherwise permitted to do so by law.

12. 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 how we are processing your personal data, 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
- **Australia:** the Office of the Australian Information Commissioner (OAIC) — www.oaic.gov.au.

13. Modifications to Policy

We regularly review our Privacy Policy. TradingHub reserves the right to change this Privacy Policy at any time with or without notice to you. When we make material changes to this Privacy Policy, we will provide notice to you by updating this Privacy Policy on our Website. Such changes will be effective upon publishing on our Website.

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

If you have any questions about this Privacy Policy or how we handle your personal data, please contact our Data Protection Officer (“**DPO**”), who is responsible for ensuring the protection of your personal data and ensuring compliance with data protection laws, at:

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

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

Email: tradinghub@symmetrygroup.ie

Post:

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