



PRIVACY POLICY

Our Commitment to You

ITI Capital Limited and its affiliated companies ("**Company**" or "**We**") are dedicated to providing users with the highest level of transparency and control over the use of their data. In order for us to provide you with our services we are required to collect and process certain personal information about you and your activity.

By entrusting us with your information, we would like to assure you of our commitment to keep such information private. We have taken measurable steps to protect the confidentiality, security and integrity of this Information. We encourage you to review this Privacy Policy carefully

Grounds for data collection

Processing of your **Personal Data** (meaning any information which may potentially allow your identification with reasonable means) is necessary for the performance of our contractual obligations towards you and providing you with our services and the operation of our website (hereinafter the **Services** and **Website**), to protect our legitimate interests and for compliance with legal and regulatory obligations to which we are subject.

When you use our Service, you consent to the collection, storage, use, disclosure and other uses of your Personal Data as described in this Privacy Policy.

How we receive data about you

We receive your Personal Data from various sources:

1. Registration data - When you voluntarily provide us with your personal details in order to create an account or register to our Services (for example, your name and email address);
2. When you communicate with us - For example when you send us an email, we collect the Personal Data you provided us with.
3. Technical data - When operating our services, we use various technological tracking tools to collect data regarding your use of the Website. Along with our partners, we may use tracking technologies such as cookies, JavaScript, beacons and Local Storage, which are used to store content data and preferences. You can learn more about the tracking tools we use by reading the Tracking Technologies section below.



4. Third party data - We also collect information about you from third party sources such as suppliers that help us prevent money laundering and fraud, marketing agencies, identity verification services and analytics providers. The categories of information that we collect about you from other sources are:

- where permissible under applicable law, personal details (e.g. name, date of birth);
- contact details (e.g. phone number, email address, postal address or mobile number); and
- employer name.

Please note that we may be required by law to collect and use certain personal information about you. And we may need to collect and use personal information to enter into or fulfil a contract with you. Failure to provide this information may prevent or delay the fulfilment of our obligations in these circumstances.

Type of data we collect

1. Personal Data - In the course of using the Service, we may ask you to provide us with certain Personal Data to provide and improve the Service, to contact or identify you, to enable you to access certain parts of the Website, and as otherwise indicated in this Privacy Policy. We collect the following Personal Data about you:

- *Registration data*: your name, address, your email address and payment details.
- *When using our Services*: our webserver will collect your IP-address and UID.
- *Information from third parties*: in order to provide our Service, we may receive Personal Data from our business partners. This may include Personal Data such as your contact details (name, phone, email) as well as details pertaining to your company, your job, your activities and publications.

2. Non-Personal Data - We also collect data about the use of our Service and the characteristics and activities of users, in order to operate it and improve it. We may collect the following non-Personal Data:

3. Technical data - This category includes data such as website visits, the browser you are using and its display settings, your operating system, device type, session start/stop time, time zone, network connection type (e.g., Wi-Fi, cellular), cookie data and your general location (city and country).

4. Data from third parties - This category includes data we receive from our business partners. This may include pseudonymous advertiser identifiers that some Advertisers or other third-party ad platforms choose to share with us. This data is also used to enhance data points about a unique browser or device.



If we combine Personal Data with non-Personal Data, the combined data will be treated as Personal Data. Further Personal Data will only be stored and processed if you voluntarily provide it to us, e.g. through a contact form.

Tracking Technologies

When you visit or access our Services we use (and authorize 3rd parties to use) pixels, cookies, events and other technologies. Those allow us to automatically collect data about you, your device and your online behavior, in order to enhance your navigation in our Services, improve our Websites performance, perform analytics and customize your experience on it. In addition, we may merge data we have with data collected through these tracking technologies with data we may obtain from other sources and, as a result, such data may become Personal Data.

We also use a tool called Google Analytics to collect data about your use of the Services. Google Analytics collects data such as how often Users access the Services, what pages they visit when they do so, etc. We use the data we get from Google Analytics only to improve our Services. Google Analytics collects the IP address assigned to you on the date you visit, rather than your name or other identifying data. We do not combine the data collected through the use of Google Analytics with personally identifiable data. Google's ability to use and share data collected by Google Analytics about your visits to our Services is restricted by the Google Analytics [Terms of Use](#) and the [Google Privacy Policy](#).

Managing your cookie settings and opting out of 3rd party cookies

There are various ways in which you can manage and control your cookie settings. Please remember that, by deleting or blocking cookies, some of the features of the Services may not work properly or as effectively.

Turning off cookies via your web browser

Most web browsers will provide you with some general data about cookies, enable you to see what cookies are stored on your device, allow you to delete them all or on an individual basis, and enable you to block or allow cookies for all websites or individually selected websites. If you want to delete cookies that are already on your device, you can do this by deleting your browser history or visit www.aboutcookies.org. You can also block cookies by activating the setting on your browser that allows you to refuse the setting of some or all cookies. However, in a few cases, you may find that you are not able to access parts of our website. You can also normally turn off third party cookies separately. Please note that the settings offered by a browser or device often only apply to that particular browser or device.



How we use the data we collect

1. Provision of service - For the provision and improvement of our Services, including for support and to respond to your queries.
2. Service announcements - We will use your Personal Data to communicate with you and to keep you informed of our latest updates to our Services and offer you service offers.
3. Marketing and advertising purposes - We may use your Personal Data in the following ways: we may send you promotional material concerning our Services, or our partners' services, which we believe might interest you; we may also display certain adverts on our site, which we believe will be relevant for you. Furthermore, by subscribing to our newsletter you will receive tips and announcements straight to your email account. We make our best efforts to make sure you see only relevant ads and receive relevant communications from us, including but not limited to, by building an automated profile based on your Personal Data. You may however choose not to receive our promotional or marketing emails (all or any part thereof) by clicking on the unsubscribe link in the emails that you receive from us. Please note that even if you unsubscribe from our newsletter, we may continue to send you service-related updates and notifications or reply to your queries and feedback you provide us. You may also object to the use of your Personal Data for advertising purposes by disabling your cookies, as described in the tracking technologies section above.
4. Opt-out of receiving marketing materials - If you do not want us to use or share your Personal Data for marketing purposes, you may opt-out in accordance with this "Opt-out" section. Please note that even if you opt-out, we may still use and share your Personal Data with third parties for non-marketing purposes (for example to fulfill your requests, communicate with you and respond to your inquiries, etc.). In such cases, the companies with whom we share your Personal Data are authorized to use your Personal Data only as necessary to provide these non-marketing services, and only for the purposes described in this Privacy Policy.
5. Analytics, surveys and research - From time to time, we may conduct surveys or test features, and analyze the data we have to develop, evaluate and improve these features, all in order to improve our Services and think of new and exciting features for our users.
6. Protecting our interests - We may use your Personal Data when it's necessary in order to take precautions against liabilities, investigate and defend ourselves against any third-party claims or allegations, investigate and protect ourselves from fraud, protect the security or integrity of our services and protect the rights and property of the Company, its users and/or partners.
7. Compliance with legal and regulatory requirements - We may use your Personal Data to investigate legal and regulatory violations, and as required by law, regulation or other governmental authority, or to comply with a subpoena or similar legal process.



With whom we share your Personal Data

1. Internal concerned parties - We share your data with companies in our group, as well as our employees, in order to provide you with our services.
2. Business partners - We share your data with business partners, such as storage and analytics providers who help us provide you with our service. These third parties may have access to your Personal Data so that they may perform these tasks on our behalf, but they are obligated to comply with this Privacy Policy and may not use your Personal Data for any other purpose.
3. Compliance with laws and law enforcement entities - We cooperate with government and law enforcement officials in order to comply with our reporting, legal and/or regulatory requirements. For example, we may be required to disclose an individual's Personal Data in response to a lawful request by public authorities, including meeting national security or law enforcement requirements.

Merger and acquisitions - We may share your data if we enter into a business transaction such as a merger, acquisition, reorganization, bankruptcy, or sale of some or all of our assets. Any party that acquires our assets as part of such a transaction may continue to use your data in accordance with the terms of this Privacy Policy.

EEA Users

Some of the processing we conduct will involve making decisions about you based on automated processing of your Personal Data. For example, we may conduct profiling activities to select personalized offers or recommendations for you based on your use of the Services or browsing history. If you are in the EU, where these decisions are based solely on our automated processing of your Personal Data (e.g., not subject to human review), these types of decisions will not have legal or similar effects on you, but you can still contact us for further information and to object to this use of your personal information.

Under EU privacy law, we must have a legal basis to process Personal Data. In most cases the legal bases for our processing, under EU law, will be one of the following:

1. to fulfil our contractual obligations to you, for example to provide the Services or to ensure that invoices are paid correctly;
2. to comply with our legal and/or regulatory obligations, for example obtaining proof of your identity to enable us to meet our anti-money laundering obligations; and/or
3. to meet our legitimate interests, for example to: understand how you use the Services and to enable us to use this knowledge to improve our products and services and to develop new ones; to communicate with you about the products and services that you use or we offer; maintain our accounts and records; to assess patterns of use; and to plan and evaluate our marketing and business development programs. When we process Personal Data to meet our



legitimate interests, we put in place, when needed, safeguards designed to protect your privacy interests, freedoms, and rights under applicable laws.

4. We may obtain your consent to collect and use certain types of Personal Data when we are required to do so by law (for example, in relation to some direct marketing activities, our use of cookies and tracking technologies or when we process sensitive personal information). If we ask for your consent to process your Personal Data, you may withdraw your consent at any time by contacting us using the details at the end of this Privacy Policy.

5. We may anonymize your Personal Data and use it for other purposes. For example, we may prepare aggregated reports about how users interact with the Services for research.

For additional terms applicable to users in the EEA, please [click here](#). Please note some data recipients may be located outside the EEA. In such cases we will transfer data of EEA Users only to such countries as approved by the European Commission as providing adequate level of data protection or enter into legal agreements ensuring an adequate level of data protection.

How we protect your data

We have implemented administrative, technical, and physical safeguards to help prevent unauthorized access, use, or disclosure of your Personal Data. Your data is stored on secure servers and isn't publicly available. We limit access of your data only to those employees or partners on a need to know basis, in order to enable the carrying out of the agreement between us.

While we seek to protect your data to ensure that it is kept confidential, we cannot absolutely guarantee its security. You should also be aware that there is always some risk involved in transmitting data over the internet. While we strive to protect your Personal Data, we cannot ensure or warrant the security and privacy of your Personal Data or other content you transmit using the service, and you do so at your own risk.

Retention

We will retain your Personal Data for a 7 year period in order for us to meet our legal obligations, resolve disputes, and enforce our policies, with, for example, any personal data relevant to our anti-money laundering obligations to be held for a period of at least five years in order for us to comply with our record keeping obligations under the Money Laundering Regulations 2017. Retention periods will be determined taking into account the type of data that is collected and the purpose for which it is collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused data at the earliest reasonable time. Under applicable regulations, we will keep records containing client Personal Data, trading data,



account opening documents, communications and anything else as required by applicable laws and regulations.

Security

We have put in place certain safeguards to help prevent unauthorized access and maintain data security with respect to your Personal Data. Despite these protections, however, we cannot guarantee that your data will be 100% secure. You should take measures to protect your Personal Data.

Your online access to your Personal Data may be protected with a password you select. We will never ask you for your password in any unsolicited communication (such as letters, phone calls or email messages). You have an obligation to keep your user ID, password and personal information secure. You will be solely responsible for keeping your password confidential and for all use of your password and your account, including any unauthorized use. As part of maintaining this obligation we recommend you do the following:

1. Keep your user ID and password confidential;
2. Utilize a unique password and change it frequently;
3. Make sure others are not watching you enter your user ID and/or password on your keyboard when using protected elements of the Services; and
4. Do not leave your computer unattended while logged onto protected elements of the Services. After you finished accessing your information, exit the protected area.

Complaints

If you have a concern about our privacy practices or where you believe your data has been processed in a way that does not comply with GDPR, you can make a complaint which will be acted on promptly. To make a complaint, please contact us on the details provided below.

If you are not satisfied with our response, you have the right to submit a complaint to our supervisory authority, the Information Commissioner's Office (ICO). You can contact them on their helpline on 0303 123 1113 or alternatively you could visit their website at <https://ico.org.uk/> to find out more.



ITI Capital Limited
Level 33 Tower 42, 25 Old Broad Street, London
EC2N 1HQ, UK

To contact us?

If you wish to exercise any of the aforementioned rights, or receive more information, please contact us using the details provided below:

Head of Compliance
ITI Capital Limited
Level 33 Tower 42,
25 Old Broad Street,
London EC2N 1HQ.

Tel: + 44 (0) 207-562-8000
Email: compliance@iticapital.com

Our Privacy Policy toward Children

We understand the importance of protecting children's privacy, especially in an online environment. The Site and Services are not designed for or directed at children under the age of 18 years old (**Minors**). We do not knowingly collect Personal Data from Minors. If a parent or guardian becomes aware that his or her child has provided us with Personal Data, he or she should contact us using the details provided above.

Updates to this Privacy Policy

This Privacy Policy is subject to changes from time to time, in our sole discretion. The most current version will always be posted on our website (as reflected in the "Last Updated" heading). You are advised to check for updates regularly. By continuing to access or use our Services after any revisions become effective, you agree to be bound by the updated Privacy Policy.

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