+44 (0)2076217970
clientsupport@ecmarkets.co.uk
www.ecmarkets.co.uk

Privacy Policy

EC Markets is a trading name of **EC Markets Group Ltd**, a company incorporated in England and Wales (no. 07601714) with trading address, Parksworth House, **30 City Road, London, EC1Y 2AY**. EC Markets Group Ltd is authorised and regulated by the Financial Conduct Authority (FRN: 571881). Web: www.ecmarkets.co.uk Email clientsupport@ecmarkets.co.uk Tel: 0207 621 7970

Background

EC Markets Group Ltd ("the Firm") understands that your privacy is important to you and that you care about how your personal data is used. The Firm respects and values the privacy of everyone who uses our app or visits our website www.ecmarkets.co.uk. The firm will only collect and use personal data in ways that are described here, and in a way that is consistent with obligations and your rights under the law.

All our employees are responsible for maintaining customer confidentiality. We provide training and education to all employees and regularly review our policies and procedures. Our aim is to make sure that you have full confidence in the Firm's policies and procedures and feel comfortable about giving us your information. We believe that safely looking after your information is a key part of our relationship. We ask that you please read this Privacy Policy carefully and ensure that you understand it.

Information About Us

EC Markets Group Ltd is a company registered in England and Wales (Reg Number 07601714). It is authorised and regulated by the Financial Conduct Authority (Reg number 571881) and Information Commissioner's Office (Reg Number Z3301414). **Our details are below:**

Parksworth House
30 City Road
London
EC1Y 2AY
Email: clientsupport@ecmarkets.co.uk

What is covered under this Policy

We are required to handle ("process") your personal data securely and in accordance with the UK General Data Protection Regulation (UK GDPR) and any countries' national legislation that imposes stricter requirements.

This privacy policy details how we manage the personal information provided to us by you or a third party in connection with our provision of services to you, or which we collect from your use of our services and/or our app and website. Our website may contain links to other websites. Please note that the Firm has no control over how your data is collected, stored, or used by other websites (third party) and we advise you to check the privacy policies of any such websites before providing any personal information to them.

Personal Data Requirements

Personal data is defined by UK General Data Protection Regulation (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'. Personal data is, in simple terms, any information about you that enables you to be identified. It covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The General Data Protection Regulation 2016/679 and Data Protection Act 2018 requires that **the personal information we hold about you must be:**

- Used lawfully, fairly and in a transparent way. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

Data Controller

This privacy notice applies to the activities of the Firm, trading as EC Markets. The firm provides online Share Dealing Services (Cash Equity), Exchange Traded Forwards, Exchange Traded Commodities (Futures/Options), Exchange Traded Notes, Investment Services (GIA), ISAs, SIPPs and Rolling Spot FX. In addition, it also applies to Spread Bets, CFDs on single stocks, CFDs on Commodities, CFDs on Equity Indices, CFDs on energy. The firm is the data controller of your personal information in relation to those services and is registered with the UK Information Commissioner's Office (ICO) under registration number Z3301414.

Personal Data that we Process

We will only collect personal data from you that is relevant to the context of our relationship with you. During the ordinary course of business, we collect, retain and use information about our clients' financial situation in order to service them to the very highest professional standards. This information is collected from several sources, and **may include information received from our clients:**

Electronically; or on application forms

We primarily collect information directly from you. Personal information is collected through our application and enrolment process (eg our application forms, online) to enable us to verify your identity. We will also use your personal information to provide ongoing administration of your account, e.g. to collect and apply deposits to your account and issue statements etc. We also need this information to carry out our obligations and to provide you with the products and services under the terms of your contract with us. Without this information, we wouldn't be able to provide you with an account.

We may use Artificial Intelligence-tools (AI) to process and analyse your information as part of our activities. We will also collect personal data from other sources, publicly available sources (e.g., the press, registers of companies, and the internet—including social media platforms), and from providers of business-risk screening services, anti-fraud databases, sanctions lists and databases of news articles.

By telephone

We will ask you for some personal details to enable us to identify you when you call and allow us to confirm that you're the owner or representative of the account. We will hold details of the call for audit and administration purposes and to allow us to facilitate the contract. The recording of the call will be kept for a minimum of 5 years and any documentation from the call will be kept in line with our record retention policy so that we can meet our legal obligations when resolving complaints or legal disputes.

The types of personal data that we process may include:

- Name, address and contact details
- Date of Birth and Gender
- Information about your wealth including details of assets and liabilities, account info, balances, trading statements, tax and financial statements, specimen signature, details about knowledge of financial products and services, risk appetite, capacity for loss, tax status and domicile;
- Your profession / employment detail
- Trading Performance, including data deriving from your usage of our IT platforms and mobile apps;
- KYC (Know Your Customer) records, such as passport details, social security number, any prominent public function and/or adverse media coverage.
- Biometric data for the purpose of verifying your identity during onboarding;
- Information about any harm or disadvantage you as a client may be vulnerable to;
- Recordings of calls and electronic communication;
- Records of your engagement with our platform, apps, emails, text messages and social media;
- IDFA (Apple iOS) and Google Advertising ID (primarily Android) device-based IDs.
- Information on geographical location for the purpose of complying with sanctions and other legal requirements.

How we use your Personal Information

Under the Data Protection Legislation, the Firm must always have a lawful basis for collecting and using personal data. Like all other brokerage Firms, whenever you apply for an account, we are obliged to carry out financial reviews and assessments based on the information you have provided in order to determine your eligibility.

Comply with legal Obligations

As a regulated entity we are required by law to have processes in place for the prevention, detection, or investigation of a crime; loss prevention; or fraud. We may also use personal information to meet our internal and external audit requirements, information security purposes, and as we otherwise believe to be necessary or appropriate: (a) under applicable law, which may include laws outside your country of residence; (b) to respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include authorities outside your country of residence; (c) to enforce our Terms and Conditions; and (d) to protect our rights, privacy, safety, or property, or those of other persons. The personal information you provide may be used where necessary to assist us in complying with these regulations.

Improve our services/performance

We will use your information to make sure we give you and other clients the best possible service. This includes testing new systems, checking upgrades to existing systems, training, undertaking transactional analysis, conducting audits and assessing insurance risks. It also involves improving our products and services, as well as providing information to our Regulators. We do this to meet our legitimate interests in providing better services to our customers and making sure your information is appropriately protected.

Security

It is possible that we may also take your details to keep a record of who has entered our premises on any given day. It is in our best interest to do this to maintain a safe and secure working environment.

Fraud Prevention

To make sure we help in the international fight against terrorism, money laundering, modern slavery and other criminal activities, the government requires us to screen all applications made to us. As a result of this, where necessary, we may disclose all pertinent information to fraud prevention agencies and to government bodies.

Legitimate Interests:

Legitimate interests to process your personal data include:

- Analysing, developing or optimising products and services, including customer service.
- Information and building security.
- Information for potential clients before finalising account opening and visitors;
- Marketing (profiling), educational material, market research and business development;
- Monitoring and recording of training lines and other forms of electronic communications;
- Prevention of financial crime, market abuse and detection of fraud on activities.
- Evaluating, bringing or defending legal claims.
- AI Chatbot chats
- Our news feed uses your investment activities and other info for a curated feed.
- Using customer feedback to help improve our business
- To uphold our regulatory responsibility toward vulnerable customers, we will use data that points towards any vulnerability that might cause harm or disadvantage we might foresee or believe is manifesting in the pursuance of financial objectives. We will use data to monitor good outcomes, including personal data about life events, resilience and capability.

Sharing your Personal Data

To fulfil your instructions to us and for the other purposes outlined above, we may also share information about you when necessary with recipients including the following: background screening providers, financial institutions, funds, payment recipients, payment and settlement infrastructure providers, exchanges, regulators, public authorities (including tax authorities and authorities handling potential sanctions infringements) and service providers, professional advisers, auditors, insurers, and potential purchasers of elements of our business.

We will only disclose your personal data when it is permitted under the contractual terms we have in place with you, permitted under UK GDPR and permitted under client confidentiality obligations. The firm does not, under any circumstances, sell your personal data to third parties.

In addition to this, we may disclose information to third parties such as data processing providers and brokers when using them to execute orders; to UK government entities like the Financial Conduct Authority or HMRC in response to any obligatory provision of information requests and to other legal or regulatory bodies should public interest require it where it is legally required by other bodies to detect, investigate or prevent crime or fraud and as otherwise requested by our clients.

Your details will be shared with Sumsub for the purposes of verifying your identity by checking them against certain databases. The Sumsub Privacy Notice can be found here.

We may communicate with you via email and SMS, to which you have the right to opt-out at any time. We may share sensitive client information with you via email. We will never share sensitive client information with you via SMS and you will be unable to reply to us and share any data that way (unless to opt-out).

Summary of Data Usage

Data We Collect	Why We Need It
Identity Info: Including Name, DOB, Country of Residence, Nationality, National Insurance Number/Tax ID and/or related Tax Identification Info, Email address, Phone and contact info.	To Establish your profile.
Financial Info: Including Income, Savings, employment details, trading history.	To assess appropriateness of our services for you.
Payment Processing Info: IBAN details and other payment processing info requested by our provider.	To facilitate funding and withdrawal for you.
Personal Documentation & Records: Including Driving License, Passport Details, ID Card, Proof of Address	To perform KYC checks.

App/Website Usage: Records of your engagement with our platform, apps, emails, text messages and social media, including IDFA (Apple iOS) and Google Advertising ID (primarily Android) device-based IDs.	To improve our services for you.
Additional Personal Info	To comply with applicable regulatory rules and laws.
Electronic Communication: Recordings of calls and electronic communication.	To provide services to you.
KYC/AML: Any additional data arising from 'Know Your Customer' (KYC) and/or 'Anti-Money Laundering' (AML) checks	To enable us to comply to Money Laundering regulations.
Personal Information from Telephone calls	To offer/improve services to you.
Additional Pension Information: Relating to Pension Contributions, transfers, withdrawals, nominated beneficiaries & employment	To manage your SIPP (if applicable)

Customer Consent

Customer consent is required for the following:

- Verifying identity using biometric data
- If requested or subscribed to a specific program, the Firm will share with your employer certain data pertaining to your trading activities on the Firms' trading platform;
- Behavioural and statistical data (cookies) from website use. Our cookie policy can be found here.
- Sharing personal data (name, e-mail and phone number) with partners and third-party platforms for marketing or referral purposes.
- If consented to - Tracking via phone apps (Apple iOS, Android, etc.), then your personal data (device-based IDs) will be collected and used for analytics and personalised marketing (optimised experience / tailored ads).
- If consented to - Website tracking (See cookie policy)
- Market content creation, for providing market content

We will always ask consent from customers if we wish to process information that does not fall into any of the categories above. Any consent given can be withdrawn at any time, but withdrawing consent does not render any prior handling of personal data unlawful. Withdrawing consent also may have an impact on our ability to continue to provide our services in the same way in the future.

Securing your Personal Data

We will always ensure that your data is properly protected and take all appropriate robust technical and organisational measures to ensure that it is secure. Our employees are trained to handle personal information in a way that ensures we respect the confidentiality of the information and the privacy of individuals.

Technical organisational measures include:

1. **Hashing/Encryption** — We may apply cryptographic methods which convert certain information or data into a code to make it unreadable for unauthorised users.
2. **Minimisation** — We ensure that the personal data we request is relevant and only limited to what is necessary in relation to the purposes for which such data is processed;
3. **Obfuscation** — Your personal data can only be accessed by employees who need verification to properly exercise their professional duties.
4. **Penetration testing** — We perform regular scanning/penetration testing against our applications and services in order to identify potential security vulnerabilities and apply the relevant remedies to rectify them
5. **Education** - We ensure our management and employees have the right training and stay up-to-date with the most recent challenges and developments to manage your data to ensure it remains confidential and integral.

Transferring your data to countries outside EU/EEA

Information relating to you may, in line with the purposes described above, be transferred to so-called "third countries", meaning countries outside the UK. This is in order to offer the best service available.

If service providers outside the UK are used, personal data is protected by either:

a) Standard contractual clauses for data transfers between the UK and third countries

b) An adequate data protection level being in place in the third country.

Transfers of your personal data to a third country will only be conducted in a way that is permitted under the UK GDPR.

Length of time we will keep your Data

We will retain your personal data for no longer that is necessary for the purposes for which we obtained it. We will keep your information for the life of your account with us and are legally obligated to hold your personal information for an additional six years. We have policies and procedures in place to ensure the information is deleted once it is no longer legally required. We are also required by law to ensure the information we hold is accurate, and as such, will regularly contact you in order to update our account information.

In limited cases we may need to preserve records beyond these timeframes in order to deal with audits, tax issues or legal claims.

In cases where the Firm has collected personal data as part of an account opening application, demo account, webinar, seminar, or other type of event, but the account opening was never started or completed, we may keep the personal data for a period of time from the date of collection. Where an account opening application has been submitted, but the client relationship has not yet been established, we will keep the data for a period from the date of submission. In both of these cases, if you show interest again during this time, we may extend the period further. However, the retention period for these scenarios will not exceed 6 months from the point that interest was last shown.

If you have not opted-out of receiving marketing materials from the Firm, we will keep personal data relevant for these purposes until you decide to opt-out.

Data Profiling

Profiling in the context of this privacy notice is the use of an automated process to analyse personal data in order to assess or predict aspects of your behaviour. We may use profiling in the following circumstances:

- To help identify potential cases of financial crime;
- To provide you with information on our products and services that seem likely to be of interest.

Your Data Protection Rights

Data protection law gives you a number of rights when it comes to personal information we hold about you. The key rights are set out below. More information about your rights can be obtained from the Information Commissioner's Office ("ICO") at https://ico.org.uk/ Under certain circumstances, **you have the right by law to:**

- Be informed in a clear, transparent and easily understandable way about how we use your personal information and about your rights. This is why we are providing you with the information in this notice. If you require any further information about how we use your personal information, please let us know.
- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it (for instance, we may need to continue using your personal data to comply with our legal obligations). You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to us using your information on this basis and we do not have a compelling legitimate basis for doing so which overrides your rights, interests and freedoms (for instance, we may need it to defend a legal claim). You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party where you provided it to us and we are using it based on your consent, or to carry out a contract with you, and we process it using automated means.
- Withdraw consent. In the limited circumstances where we are relying on your consent (as opposed to the other bases set out above) to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate interest in doing so.
- Lodge a complaint. If you think that we are using your information in a way which breaches data protection law, you have the right to lodge a complaint with your national data protection supervisory authority. In the UK, this will be the ICO.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal information, withdraw your consent to the processing of your personal information or request that we transfer a copy of your personal information to another party, please contact us via our compliance team as per details below.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us understand the nature of your request, to confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Please consider your request responsibly before submitting it. We will respond to your request as soon as we can. Generally, this will be within one month from when we receive your request but, if the request is going to take longer to deal with, we will let you know.

Who to Contact

If you have any concerns about our use of your personal information, you can make a complaint to us at complianceUK@ecmarkets.co.uk

You can also complain to the Information Commissioner's Office (ICO) if you are unhappy with how we have used your data.

The ICO's address is:

Information Commissioner's Office Wycliffe House Water Lane
Wilmslow
Cheshire
SK9 5AF
Helpline number: 0303 123 1113 ICO

website: https://www.ico.org.uk

Providing us with Personal Data

You are not required by law to provide us with personal data. However, if you refuse to do so we may not be able to continue our relationship with you. For example, we are required by anti-money laundering legislation to verify your identity. This inevitably requires us to collect certain personal data from you.

Amendments to this Privacy Notice

We may update this privacy notice from time to time in order to make clarifications or to address changes in the UK GDPR or our business operations. We will notify you if we make any substantial updates.