



Internet Privacy Policy

Internet Privacy Policy

At TradingHub we are committed to safeguarding and preserving the privacy of our visitors. The term 'TradingHub' or 'us' or 'we' refers to TradingHub Group Limited, the owner of the website, whose registered office is 21st Floor, Broadgate Tower, 20 Primrose Street, London EC2A 2EW. TradingHub's company registration number is 7382307 and it is registered with the Registrar of Companies for England and Wales. The term 'you' refers to the user or viewer of our website.

This document (**Policy**) explains how we manage any personal data that you provide to us, or that we collect from you while you visit our websites.

Our websites are not intended for children and we do not knowingly collect data relating to children.

Information That We Collect

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). In running and maintaining our websites TradingHub may collect and process the following personal data about you:

- Personal information including name, date of birth, title, marital status and gender and contact data including address, email address and telephone number.
- Information about your use of our websites 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 technology on the devices you use to access our website, information about your use of our site including details of your visits, the resources that you access and other communication data.
- Information received from third parties such as search information providers or from publicly available sources.

- Information provided voluntarily by you. For example, when you register for information.
- Information that you provide when you communicate with us by any means.
- Where applicable, information regarding trading activities, including, without limitation, communications data.
- Where applicable, profile data including username and password.

We do not knowingly collect any **special categories of personal data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences, unless we are required to do so by a requirement of law.

Use of Cookies

Cookies provide information regarding the computer or other electronic device used by a visitor. TradingHub may use cookies where appropriate to gather information about your computer or electronic device in order to assist us in improving our website. Please view our full cookies policy for more information.

Use of Your Information

We will only use your personal data in accordance with applicable data protection law. We will most commonly use your personal data where we have your consent to do so, where we need to perform the contract we are about to enter into or have entered into with you, where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests or where we need to comply with a legal or regulatory obligation.

Some examples, without limitation, of the ways in which we may use your personal data are as follows:

- To provide our services to you.
- To manage our relationship with you.
- To keep our records updated.
- To provide information to you that you request from us relating to our products or services.

- To provide information to you relating to other products that may be of interest to you.
- To inform you of any changes to our website, services or goods and products.
- To administer and protect our business and our websites.
- To use data analytics to improve our website, products and services, marketing, customer relationships and experiences.
- To ensure network security.
- To prevent fraud and to recover amounts due to us.
- To comply with a legal obligation.

TradingHub uses Google Analytics. For more information on Google Analytics and how it collects and processes data, please refer to “How Google uses data when you use our partners’ sites or apps” (located at www.google.com/policies/privacy/partners/).

We use reCAPTCHA 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.

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.

TradingHub will not give your details to any third party to use your data to enable them to provide you with information regarding their own goods or services.

Promotional offers from us

We may use your identity, contact, technical, usage and profile data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving that marketing.

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.

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.

International Data Transfers

TradingHub has offices in London and other jurisdictions outside of the UK and so processing of your personal data may involve a transfer of data outside the UK. 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 we will ensure an adequate level of protection is afforded to it. Please contact us if you would like further information on the specific mechanism used by us when transferring your personal data out of the UK. If you are a resident of the EU, we will ensure that any transfers are compatible with EU data protection legislation.

TradingHub's subcontractors / subprocessors are listed below:

- Amazon Web Services – cloud provider
- Swisscom (Switzerland) Ltd (where requested by a client)
- TradingHub group companies
 - TradingHub Pte. Limited (Singapore)
 - TradingHub International LLC (United States)
 - TradingHub Canada Limited (Canada)

Disclosing Your Information

TradingHub will not disclose your personal information other than in accordance with this Policy and in the circumstances detailed below:

- In the event that TradingHub sells any or all of our business to a buyer. The new owners may use your personal data in the same way as set out in this Policy.
- Where TradingHub is legally required by law to disclose your personal information.
- To further fraud protection and reduce the risk of fraud.
- To our permitted third-party service providers, in order to fulfil our obligations to you.
- To professional advisers, HM Revenue & Customs, regulators and other authorities.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use

your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

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.

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:

- **Request access to 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.

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 legitimate 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.

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 this web page. Such changes will be effective upon posting.

EU Representative

As required pursuant to applicable data protection laws, on 1 January 2021, we appointed Symmetry Solutions Ltd (**Symmetry**) as our representative in the EU. If you are based in the EU and have any questions about this Policy, your rights regarding your personal data or how we use your personal data, you may contact **Symmetry** at:

Email:

tradinghub@symmetrygroup.ie

Post:

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

Contacting Us

If you have any questions regarding this Policy or our privacy practices, please do not hesitate to contact the Privacy Officer at:

Privacy Officer

privacy@tradinghub.com

TradingHub Group Limited
21st Floor, Broadgate Tower
20 Primrose Street
London EC2A 2EW

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 the Information Commissioner's Office (**ICO**), the UK supervisory authority for data protection issues (www.ico.org.uk).

21/12/2022

Legal disclaimer

Copyright © 2022 TradingHub Group Limited, a private limited company registered in England under company registration number 07382307 and registered address at 21st Floor, Broadgate Tower, 20 Primrose Street, London EC2A 2EW.

TradingHub Group Limited, and if applicable, a TradingHub group company (together “TradingHub”), are providing this document to the addressee (“Addressee”) under the following strict conditions:

- i. This document contains confidential information and is intended solely for the Addressee. If you are not the Addressee or you have otherwise received this email in error, please notify us by contacting legal@tradinghub.com, immediately and permanently delete this document and do not use, copy or disclose the information contained in this document.
- ii. Any Addressee (or other third party) who is not TradingHub staff (each an “Information Addressee”) is being provided this document for information purposes only.
- iii. Nothing expressed or implied in this document is intended to create legal relations between TradingHub and an Information Addressee (or any third party). The responsibilities and liabilities of TradingHub to its clients or another third party are governed by a validly executed contract. This document is not part of and does not modify anything set out in such a contract.
- iv. TradingHub is the owner or the licensee of all intellectual property rights in this document. Those rights are protected by copyright laws and treaties around the world. All such rights are reserved.
- v. No part of this document may be reproduced or redistributed, stored or saved in a retrieval system, transmitted or utilised in any form or by any means (electronic or mechanical), photocopy, record or otherwise, without written permission from TradingHub. You are not permitted to modify this document in any way or to use any part of it separately to these strict conditions.

CONFIDENTIAL

- vi. You are not permitted to directly or indirectly (including any attempt to) reverse engineer or decompile anything contained in this document, any part thereof or any information contained therein.
- vii. This document is being provided to you on an “as is” basis. TradingHub (and its third party licensors) do not make any representations, warranties or guarantees, whether expressed or implied, as to the accuracy, completeness or timeliness of this document (or any part thereof), or as to any results obtained or inferred by an Addressee or any third party, and shall not in any way be liable to an Addressee or any third party for any inaccuracies, errors or omissions herein.
- viii. Opinions, estimates and projections in this website constitute the current judgment of the author(s) at the time of writing. They do not necessarily reflect the opinions of TradingHub. TradingHub (and its third party licensors) do not have an obligation to update, modify or amend this document or to otherwise notify an Addressee or any third party in the event that any matter stated herein, or any opinion, projection, forecast or estimate set forth herein, changes or subsequently becomes inaccurate.
- ix. TradingHub (and its third party licensors) do not have any liability whatsoever to an Addressee or any third party, whether in contract (including under an indemnity), in tort (including negligence), under a warranty, under statute or otherwise, even if foreseeable, in respect of any loss or damage suffered by it as a result of or in connection with: (a) any opinions, recommendations, forecasts, judgements, or any other conclusions, or any course of action determined, by it (or any third party), whether or not based on this document; or (b) use of or reliance on this document.