

Europe/GDPR (General Data Protection Regulation) Privacy Notice

We are committed to protecting and respecting your privacy. This privacy policy explains the types of personal information that we collect, how we use that information, who we share it with, how we protect that information, and your legal rights in relation to your information.

How we collect your personal information

Information covered by this Privacy Notice

This Privacy Notice covers all of your personal information that we collect and use. In this Privacy Notice, "personal data" or "personal information" means information that (either in isolation or in combination with other information held by us) enables you to be identified as an individual or recognised as an individual directly or indirectly. This policy applies to data protected by GDPR – including, for example, personal data relating to living individuals located in Europe, and personal data processed by our EU entities.

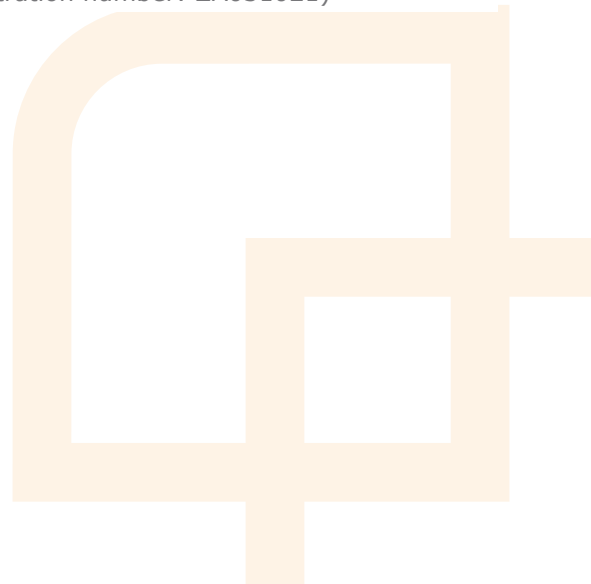
Who we are

For the purposes of data protection laws, the data controller is:

1. Cambridge Mercantile Corp. (UK) Limited (ICO Registration number: ZA031019), and/or
2. Cambridge Mercantile Risk Management (UK) Ltd (ICO Registration number: ZA031021)

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Information we collect

We may collect information about you from different sources, as detailed below.

<p>Information you give us:</p>	<p>The information that we collect from you will depend on the services that we provide to you and may include the following:</p> <ul style="list-style-type: none"> <input type="checkbox"/> name, address and contact details; <input type="checkbox"/> e-mail address; <input type="checkbox"/> tax file/ID number; <input type="checkbox"/> bank account details; <input type="checkbox"/> identification and verification information; <input type="checkbox"/> credit and payment history; and <input type="checkbox"/> account balances and transaction history. <p>In some cases, you may provide personal information to us about another person. If so, you confirm that you have the authorisation of such person to provide us with this information.</p>
<p>Information we collect about you:</p>	<p>As part of the standard operation of our websites, some information is collected automatically about your visits to the website and your device that accesses the website. We may automatically gather some of this “website usage information”, such as: The domain and host you use to access the Internet; your computer’s IP address; and mobile device geolocation and number. We may also collect other information from and about your device (such as device properties, settings, applications, stored \ information and usage) and carrier; the browser and operating system \ software you use; social profile and network information; the date and time you access our website and the Internet address used to link to our website when you visit us. Additionally, we (and our service providers) may use cookies and other similar technologies to collect and track such information after obtaining your consent to this in accordance with applicable law.</p>
<p>Information we receive and collect from other sources:</p>	<p>We also work closely with third parties (such as business partners, and service providers, marketing networks, analytics providers, co-promotion partners, third parties associated with our customers, and credit reference agencies), and may receive demographic and other personal information about you from those third parties, which we may combine with the information that you have provided to us. We process all data that we obtain from those other sources in accordance with this Privacy Notice.</p>

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How we use your personal information

We process your personal information in the following ways.

- In order to provide you with our services.
- To respond to your requests.
- For our, and our affiliates, marketing purposes, such as to notify you of any products that may be of interest to you.
- For joint marketing with other financial companies.
- To audit and monitor the services that we provide to you.
- To protect against fraud.
- For our, and our affiliates', other everyday business purposes such as to process your transactions; maintain your account(s); comply with our legal requirements, respond to court orders and legal investigations; report to credit bureaus; gather information about website access, usage and performance; improve our services and enhance your consumer experience; and validate your creditworthiness or your identity.
- To set up and manage your online account (including, for example, to send password reminders or notifications to changes to your account details) and to process your communication and privacy preferences
- In addition, we record and monitor telephone calls in order to evidence business transactions, to ensure quality control and to improve internal training measures.

Why we process your personal information

In most circumstances, we process your personal information based on the following legal justifications:

- in respect of the personal information that you provide to us in order to receive our services under a contract between us and you as an individual (and all other personal data that is generated in connection with your contract with us), we (and our affiliates) process your personal information as is necessary for the performance of that contract; and
- in respect of all other personal information, we (and our affiliates) process your personal information as necessary for our legitimate interests, including in order to:
 - comply with our legal and regulatory obligations;
 - keep our customers' payments secure;
 - sell and supply services to our customers;
 - understand our customers' behaviour, activities, preferences, and needs;
 - send our customers details of similar products or services (Where you are a new or prospective customer, we will only send you direct marketing communications via email or text message with your consent.);
 - fulfil our duties to our customers, shareholders and other stakeholders; and
 - effectively handle any legal claims or regulatory enforcement actions taken against us.

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How we share your personal information

We may share your personal information with certain third parties in connection with the provision of our services, including:

- ❑ Our group of companies, including our affiliates, head office and branches, in order to open your account with us, administer our services and products, provide you with customer support, process your payments, understand your preferences, send you information about products and services that may be of interest to you and conduct the other activities described in this Privacy Notice.
- ❑ Computer services consultants and technicians or other security and compliance consultants, in order to ensure the confidentiality and security of customer records.
- ❑ Financial service providers, such as banking partners and other payment rails, in order to carry out required institutional risk control, to carry out requested services and/or to protect against actual or potential fraud, unauthorized transactions, claims, or other liability.
- ❑ Where required or permitted by law, for example to government and/or law enforcement agencies; to check for potential red flags via credit and criminal background checks of prospective employees and prospective customers, as required or permitted by law.
- ❑ Inputting your information on a third party customer relationship management platform.

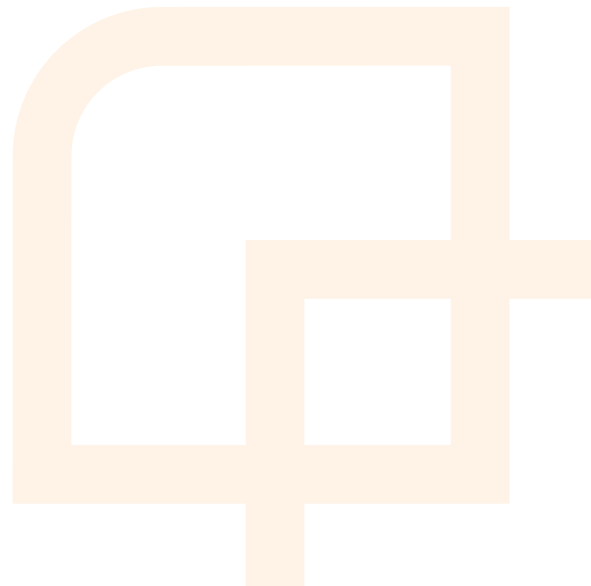
We may also use third party web analytics services, e.g. Google Analytics, to help us track and analyse the use of our website and to measure the effectiveness of our marketing, website content and communications. These service providers are acting on our behalf and use tools such as cookies, tags and web beacons, to help us gain this understanding. (See <https://cookiesandyou.com/> to learn what cookies are and how to disable them.)

Where we store your data

Your personal information from may be transferred from the EEA (European Economic Area) for processing in Canada, which is where our Company's data servers are located. Your data may also be processed in the United States, in Australia and in other countries by our affiliates and our service providers. We will ensure that such data are processed and transferred in accordance with this Privacy Notice and applicable laws. Some or all of these countries may provide less privacy protection than EEA countries. We will take all steps that are reasonably necessary to ensure that your personal information is treated securely and in accordance with this Privacy Notice and applicable data protection laws, including, where relevant, entering into EU standard contractual clauses (or equivalent measures) with data recipients in such countries (a copy of the clauses is available at https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en).

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Your privacy rights

You have eight key rights in connection with our processing of your personal information, each of which is explained below. If you wish to exercise one or more of the first seven rights listed below, please contact us with your request at gdpr@cambridgefx.com. Please include your name, email and postal address, as well as your specific request and any other information we may need in order to provide or otherwise process your request.

a) Access	You have the right to request a copy of the personal information that we are processing about you, which we will provide you in electronic form. For your own privacy and security, in our discretion we may require you to prove your identity before providing the requested information.
b) Rectification	You have the right to have us correct incomplete or inaccurate personal information that we process about you.
c) Deletion	You have the right to request that we delete personal information that we process about you, except we are not obligated to do so if we need to retain such data in order to comply with a legal obligation or to establish, exercise or defend legal claims.
d) Restriction	You have the right to restrict our processing of your personal information where: 1) such data are inaccurate, 2) our processing is unlawful, or 3) we no longer need to process such data for a particular purpose, but: it is a situation where we cannot delete the data either because of a legal obligation, or because you don't want us to delete the data. In such case, we would mark stored personal information with the aim of limiting particular processing for particular purposes in accordance with your request, or otherwise restrict its processing.
e) Portability	You have the right to obtain personal information that we hold about you, in a structured, electronic format, to enable data transfer to another data controller, provided: (a) The data are personal information which you have provided to us, and (b) we are processing that data either on the basis of your consent or to perform a contract with you.
f) Objection	Where the legal justification for our processing of your personal information is our legitimate interest, you have the right to object to such processing on grounds relating to your particular situation. We will abide by your request unless: 1) we have compelling legitimate grounds for the processing which override your interests and rights, or 2) we need to continue to process the data for the establishment, exercise or defence of a legal claim.

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<p>g) Withdrawing Consent</p>	<p>If you have consented to our processing of your personal information, you have the right to withdraw your consent at any time, free of charge. If you would like to withdraw consent, including if you would like to opt out of receiving marketing correspondence from us, or if you wish us to stop sharing your personal information with third party marketers, please contact us at gdpr@cambridgefx.com. To opt out of marketing you may also follow the unsubscribe instructions located in our marketing emails (as applicable). Please understand that if you opt out of receiving promotional correspondence from us, we may still contact you in connection with your, relationship, activities, transactions and communications with us. Additionally, if you do request that we stop sharing your personal information with third parties for their direct marketing purposes, it is also prudent you opt out from communications from that third party directly.</p>
<p>h) Make a Complaint</p>	<p>You have the right to lodge a complaint with the local data protection authority if you believe that we have not complied with applicable data protection laws. If you are based in the European Economic Area (EEA), please visit this website for a list of the relevant local data protection authorities: http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080.</p>

How long do we keep your personal information

Your personal information is stored by us and/or our service providers for as long as necessary to fulfil the specific purposes described in this Privacy Notice and to the extent permitted by applicable laws. It is a legislative requirement that we keep all personal information and records, generally for a period of 5-6 years. Should you cease to be a customer of ours, we will maintain your personal information on or off site in a secure manner: generally for a period of 5-7 years. When we no longer have a legitimate business purpose for your personal information, or when you request that we delete your personal information (except where we need to retain it in order to comply with a legal obligation/legislative requirement or to establish, exercise or defend legal claims), we will remove such information from our systems and records, which includes taking steps to anonymise it so that you can no longer be identified from it.

Security of your personal information

We use administrative, technical, and physical measures to safeguard personal information against loss, theft and unauthorised uses, access or modifications.

Certain areas of our websites are password protected. Where we have given you (or where you have chosen) a password, you are responsible for keeping this password confidential. We ask you not to share your password(s) with anyone.

Payments made via our websites are processed in a secure environment using third party software.

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Third Party Websites

Our websites may contain links (which may take the form of hyperlinks, widgets, clickable logos, plug-ins, images or banners) to websites and services operated by entities other than us. This Privacy Notice does not apply to such other websites or services, and we recommend that you review their posted privacy policies so that you understand the relevant information collection, use and disclosure practices of such other websites and services.

Changes to this Privacy Notice

We may change this Privacy Notice from time to time and the amended notice will be posted on our websites. Under certain circumstances (for example, in connection with certain material adverse changes to this Privacy Notice), we may notify you through additional means, such as contacting you via email.

Contact Us

If you have any questions about this Privacy Notice and/or about the privacy policies and practices of our service providers, please contact us

By email at gdpr@cambridgefx.com, or

By letter mail at: Cambridge Mercantile Corp. (UK) Limited, Attention: Privacy Officer, 71 Fenchurch Street, 10th Floor, London, England EC3M 4BS, or

By phone at +44 (0) 207 398 5700

This Privacy Notice was last updated 23 May 2018.

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