

CUSTOMER PRIVACY POLICY (Version 022019)

Introduction

This Customer Privacy Policy, is issued by CAMcap Markets Limited (CAMcap, the Firm) in the capacity of “Data Controller” for the purposes of GDPR and is addressed to you as a customer (or potential customer) of CAMcap and to those individuals (“Data Subjects”) including employees, contractors, agents, representatives, directors, partners, beneficial owners and controllers and any other individual associated with you in the context of your customer relationship with CAMcap.

The Firm is committed to keeping your personal data safe and to ensuring the integrity and security of any personal data we may process. We ask you to read the CAMcap privacy statement very carefully as it contains important information on the way in which we will process your personal data, in particular:

- The personal information we collect about you;
- Our legal basis for processing your personal data;
- What we do with your personal information;
- Who your personal data may be shared with; and
- Your rights as a data subject under the Data Protections Regulations.

1. Collection and Processing of Personal Data

1.1 Personal Data collected

Names, addresses, dates of birth, email addresses, telephone numbers, position, occupation, passports and other national identification documentation, proof of address documentation, beneficial ownership, Politically Exposed Person and Relevant Close Associates information, sanctions lists and adverse media information, monitoring information including recording of telephone conversations, Bloomberg and email communications and information pertaining to Data Subject access requests.

1.2 Methods of collection

Direct requests during the customer on-boarding due diligence process (or any periodic due diligence review thereafter), during the ordinary course of the customer business relationship, via third party service providers such as on-boarding platforms and public registers and via CAMcap affiliated entities.

1.3 Purpose of processing

The provision of brokerage and advisory services, business and contractual purposes, compliance with legal and regulatory obligations (in particular, with respect to Anti-Money Laundering and Counter Terrorist Financing legislation, MiFID II, EMIR) and to establish and exercise applicable legal rights.

1.4 Legal basis for processing

CAMcap will only process your data where we have a legal basis for doing so. The Firm may rely on the following legal bases for collecting and further processing your personal data:

- The performance of contracts; and/or
- Compliance with legal and regulatory obligations and requirements; and/or
- Consent of the Data Subject; and /or
- Legitimate Interest.

1.5 Disclosure / sharing of Personal Data

CAMcap may share your data with approved third-party providers that have adequate data protection measures in place that align with the requirements of the data protection regulation, including:

- Internally for business purposes;
- Professional companies and other persons providing services to the Firm in the normal course of business including legal, professional advisers, auditors, tax and accountancy advisers;
- Credit reference agencies, identity reference & fraud prevention agencies;
- Government, regulatory and law enforcement agencies in the Firm's legal domicile.

CAMcap will not sell your personal data or other information to any third party.

Please note you have the right to object to any processing for which we rely on Legitimate Interest as the legal basis. You can do so by using the contact details set out at the end of this privacy statement.

1.6 Storage and data retention policy

Personal data will be retained for the purposes detailed in this privacy policy and where we have a legal basis for doing so.

The Firm will only retain your personal data for as long as necessary for the purposes for which it was first obtained and to meet our legal and regulatory requirements.

We will regularly review our records to ensure that we do not retain your personal data longer than is necessary, unless there is a legal requirement for extended retention.

CAMcap takes the protection of your personal data seriously and maintains robust systems and business continuity plans. These plans are available to customers to review on request.

1.7 Transfers outside the European Economic Area

CAMcap may transfer Personal Data to a third country (being a jurisdiction outside the EEA, or the United Kingdom in the event that the United Kingdom is not a member of the EEA) where the European Commission (or in the event of the United Kingdom is not a member of the EEA the equivalent competent authority) has acknowledged that the third country ensures an adequate level of protection or where applicable and appropriate safeguards and/or derogations are in place.

1.8 Subject Access

- Individuals can make a subject access request verbally or in writing.
- We have one month to respond to a request.
- We cannot charge a fee to deal with a request in most circumstances.

We are required to gain your explicit consent prior to processing any sensitive information about you, for example, information about your physical health or mental health however, we can assure you we would have no need to collect such data other than for health and safety assessment purposes.

We may use your personal data for CAMcap interests in order to allow us to provide the best services and customer experience and to ensure our service remains relevant and tailored to your needs, for example, we may rely on our legitimate interest to process your personal data to send you company updates, newsletters or other marketing communications. Although this is to enhance communications for your benefit, you will be made aware of the ability to opt out of marketing campaigns.

1.9 Your rights in respect of your data

- Access rights: You can request a copy of the personal information we hold about you.
- Right to request rectification: We take reasonable steps to keep your information accurate, but you can also ask us to change any information we hold about you to keep it accurate, complete and current.
- Right to request erasure ('to be forgotten'): You have the right to ask us to delete the personal information we hold on you; however, please note that there may be circumstances where you ask us to erase your personal data but we are legally required to retain it.
- Portability: You have the right to request that we send the personal data you provided to us to another data controller⁴ in a commonly used electronic format, where technically feasible.

- Right to request restriction: You can request that we restrict our processing of your personal information.
- Right to raise an objection to our processing: Where our processing of your information is performed on the basis of 'legitimate business interest', then you can request we stop.
- Right to complain to a supervisory authority: If you are dissatisfied with our use or management of your personal information, you have the right to complain to an EU Data Protection Supervisory Authority. In the UK, the relevant Data Protection Supervisory Authority is the Information Commissioners Office (ICO) you can contact them via their website: www.ico.org.uk or via the link below.

1.10 Personal data provided in respect of third parties

You acknowledge that you are required to have the authority to provide any third party's personal data to us and agree to share this data protection statement with such third parties and inform them of the details you have advised us of.

If you would like further information on the collection, use, disclosure, transfer or processing of your personal data or the exercise of any of the rights listed above, please email:
legal.compliance@camcapmarkets.com.

You can find out more information about your rights by contacting the data protection regulator in your jurisdiction, the Information Commissioner's Office, or by searching their website at:
<https://ico.org.uk>

ANNEX I: Definitions

In these Terms, the following words and phrases shall where the context so permits have the following meanings:

"GDPR"

The General Data Protection Regulation (EU) 2016/679

"Consent"

Any freely given, specific, informed and unambiguous indication of the Data Subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

"Controller"

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by European Union or Member State law, the controller or the specific criteria for its nomination may be provided for by European Union or Member State law.

"Personal Data"

Any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

"Processing"

Any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction

"Processor"

The natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.