

## ■ Data Protection

For the purposes of the General Data Protection Regulation (Regulation (EU) 2016/679) or any success or law enacted in England and Wales ("Data Protection Laws") Finalto Financial Services Limited ("we", "us") is the controller of personal data collected in connection with providing the services.

We may collect personal data about you (and, where applicable, people connected to your business such as beneficial owners and directors) in the course of our Onboarding processes, including through completing due diligence, when administering transactions and carrying out reviews, when you contact us (including by telephone), when you use our website or applications, and from publicly available sources or third parties. The personal data we collect about you may include your name; your contact details (for example, a postal address, email address and/or telephone number); your date of birth and gender; your work contact information and details of your job role; your financial details, including tax details; information relating to your trading activities, including trading statements, trading performance, trading experience and trading behaviour; your photographic ID, such as a passport, national ID or driver's licence and any other information that you may disclose to us in the course of a telephone call when you contact us or during the Onboarding process.

We may use your personal data for the purposes of administering transactions and maintaining current and accurate information in relation to such transactions; providing services and access to online platforms; contacting you; compliance with applicable laws, including carrying out anti-money laundering checks and complying with reporting obligations; creating statistical data in order to fulfil our legal and accounting requirements, to analyse our business, and to manage risks and internal business procedures; introducing you to third party brokers with whom we have a mutual relationship; defending and protecting our rights.

For the purpose of the Data Protection Laws, the legal basis on which we process personal data are that the processing is necessary for our legitimate interest in administering our business. We may disclose your personal data to our Affiliates, subcontractors and/or agents; credit reference agencies or other organisations that help us to make credit decisions and reduce the incidence of fraud; third party service providers, for example those who provide administrative support, IT or marketing services; financial, regulatory and compliance advisors, and insurance providers; third party brokers; anyone that you authorise us to share your personal data with from time to time; regulators and government agencies in any jurisdiction, where we are required to do so by applicable law.

We may use your personal data to contact you by post, telephone, or by email with information regarding your account and/or announcements or updates to our products and services. If you do not wish your personal data to be used for these purposes, please give us written notice to that effect (if emailing us, please include the words "Data Protection" in the subject line of the email).

Your rights: You may be entitled to request access to personal data we hold about you, or to request that your personal data is erased, that its processing is restricted, or that any inaccurate personal data we hold about you is rectified. You may also have the right to object to the processing of your personal data and, in some circumstances, you may have the right to receive a copy of the personal data we hold about you in a machine-readable format. If you wish to make such a request, please give us written notice to that effect (if emailing us, please include the words "Data Protection" in the subject line of the email).

You have the right to complain to the Information Commissioner's Office if you believe that we have breached our obligations under the Data Protection Laws, or you are otherwise concerned about the way in which your personal data is handled. Please visit [www.ico.org.uk](http://www.ico.org.uk) for further information.

We only collect your personal data for the specific purposes set out above. We will only retain your personal data for as long as is necessary to fulfil these purposes, and for the purposes of legal and regulatory compliance.

The personal data that we collect from you may be transferred to, and stored at, a destination outside the EEA. Any such transfers of your personal data will take place in compliance with the Data Protection Laws and on the basis of appropriate and suitable safeguards. If you would like further information about the way in which we transfer your personal data, please give us written notice to that effect (if emailing us, please include the words "Data Protection") in the subject line of the email.