



STATER
GLOBAL MARKETS

PRIVACY POLICY

V0.2 – 2018

1. Privacy Statement

STATER GLOBAL MARKETS LIMITED ('Stater', 'we', 'us', 'our') is committed to ensuring the confidentiality and security of the personal information of its clients and is also committed to complying with the applicable data protection rules such as Data Protection Act 1998 ('DPA') and the General Data Protection Regulation 2016 ('GDPR') which will supersede the DPA from 25 May 2018. This policy details how Stater uses your '*personal data*' and sets out the lawful basis for processing personal data.

2. What is personal data under the GDPR?

'Personal data' means 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;

Stater uses information for the following purposes:

- As part of our contractual necessity to provide our service to you and to perform the contract with you (including processing transactions);
- As part of our legal obligation to perform due diligence, confirm your identity and prevent fraud

3. How we collect your personal data

When you browse our website, we will use **cookies** to collect the IP address of your device to track the performance of the website. This data is anonymous, and we cannot identify you at this point. We do not use information transferred through cookies for any direct promotional or marketing purposes without your consent.

When you send us a message via our website, we collect name, email and phone number. We will not process this data for any other purpose than contacting you and it will not be use for other marketing purposes.

Our website uses Google Analytics, a web analysis service of Google Inc. ("Google"). Google Analytics uses so-called "cookies", text files which are stored on your computer and which allow for analysis of your use of the website. Information generated by cookies about your use of this website (including your IP address, which is however anonymised in such a way that you can no longer be associate with a connection) is transferred to a Google server in the USA and stored there. Google will use this information to evaluate your use of the website, to compile reports about activities on the website for the website operator and provide other services relating to use of the website and internet use. Google may also possibly pass on this information to third parties if required by law or if these third parties process this data on behalf of Google.

The Opt-out browser Add-on for Google Analytics gives website visitors more control over which data about visited websites is collected by Google Analytics. You can opt out of data collection via Google Analytics effective



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in the future by installing an Opt-out Add-on (<http://tools.google.com/dlpage/gaoptout?hl=en>) for your browser.

4. Who we share your personal data with

Stater will share your personal data with the following parties:

- service providers such as cloud-based providers with high security standards.
- service providers that provide services for or on our behalf, such as companies that help us with data or that verify your identity. These entities are limited in their ability to use your information for purposes other than providing services for us;
- other parties when required by law or as necessary to protect our services, including instances:
 - a) to comply with the law or respond to compulsory legal process (such as a search warrant or other court order);
 - b) to verify or enforce compliance with the policies governing our services; and
 - c) to the Financial Conduct Authority and any other regulatory and government bodies from time to time in the UK and other countries.

5. Storing data outside the EU

Stater may need to transfer your information to other group companies or service providers in countries in or outside the European Union ("EU"). This may happen if our servers or suppliers and service providers are located elsewhere.

The data that we collect from you may be transferred to, stored at or otherwise processed in the USA. When we transfer your personal data outside the EU, we endeavour to protect your privacy and rights by ensuring the recipient has adequate systems and measures to safeguard data and by agreeing to EU approved model contractual clauses with the data recipient which are designed to protect you.

By using or participating in any service and/or providing us with your information, you consent to the collection, transfer, storage and processing of your information outside of the EU.

6. Data retention

Stater takes reasonable steps to ensure that we retain information about our clients only for so long as is necessary for the purpose for which it was collected, or as required by any applicable law or regulation to which we are subject.



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7. How Stater secures your personal data

Stater works hard to protect the information that we hold. In particular Stater:

- holds personal information in secure facilities and where the information is held electronically, on secure servers;
- uses encrypted transmission links whenever we can;
- uses other safeguards such as firewalls, authentication systems (e.g., passwords), and access control mechanisms to control unauthorised access to systems and data;
- regularly reviews our information collection, storage and processing practices, including physical security measures, to guard against unauthorised access to systems; and
- restricts access to personal information to our employees, contractors and agents who need to know that information in order to process it for us and who are subject to strict contractual confidentiality obligations. They may be disciplined, or their contract terminated if they fail to meet these obligations.

The provisions of this policy apply to visitors to our website, former clients, current clients, applicants and recipients of our services.

This Statement may be amended from time to time, consistent with the requirements of applicable law, and will be effective immediately. Clients may request access to information held about themselves by contacting Stater's Compliance Officer at simon.henry@staterglobalmarkets.com.