Regulated by the Dubai Financial Services Authority (DFSA reference F004173)

TF GLOBAL MARKETS (UK) LIMITED

Privacy Policy

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Contact

compliance@thinkmarkets.com
Phone: +971 (04) 448 4229
www.thinkmarkets.com/ae
Unit P6-02D Podium Level, Damac Park Towers,
Commercial A, Dubai International Financial Centre, Dubai, United Arab Emirates

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TF Global Markets (UK) Ltd is committed to protecting your privacy and personal information. We have created this Privacy Policy to let you know what information we collect when you use our services, why we collect this information and how we manage this information. It is our policy to respect the confidentiality of personal information and the privacy of individuals. We are bound by the General Data Protection Regulation and relevant laws and regulations.

We may periodically make changes to this Privacy Policy and will notify you of these changes by posting the modified terms on our website. In case of doubt, Personal Information we collect, and hold is governed by the current version of this Privacy Policy on our website at the relevant time, we recommend that you revisit this Privacy Policy regularly.

1 Data controller

TF Global Markets (UK) is the data controller of your personal information and this policy applies to the processing of activities by TF Global Markets (UK) and any trading names the firm operates for example ThinkMarkets, ThinkForex and Trade Interceptor.

2 Collection of Personal Data

Why do we collect information?

As part of providing services, or information about our services, to you, and to ensure we do this in a compliant way, under the authorisation of our regulator, we must collect some personal information from our clients, potential clients, visitors to our website and service providers or suppliers. This may include third parties carrying out credit or identity checks on our behalf. The credit search is not seen or used by lenders to assess your ability to obtain credit and is required to adhere to money laundering regulations.

When you apply to open an account, when you maintain an account with us, or request a service we will require you to provide us with information about you. We will need to use the information in certain ways – from basic needs like verifying your identity to more complex things like determining whether financial trading is appropriate for you and processing your requests and transactions. We may need to use your personal information to comply with applicable law, court order or other judicial process, or the requirements of any applicable regulatory authority.

We may collect your name and contact details (such as your email address, phone number or address) in order to send you information about our products and services which you might be interested in. We may collect this directly from you, or through a third party. If a third party collected your name and contact details, they will only pass those details to us for marketing purposes if you have consented to them doing so. It is in our legitimate interest to use your personal information in such way. If you do not wish to receive this information, please contact us by emailing our customer service team at support@thinkmarkets.com.

Our web pages and emails may contain; cookies, web beacons or pixel tags or any other

similar type of data analysis tools which allow us to track receipt of correspondence and to count the number of users that have visited our webpage or opened our correspondence.

Information collected

We may collect the following types of information from actual or potential customers:

- your full name, address and contact information including but not limited to phone number and email address;
- date of birth and gender;
- professional and employment details;
- identification details such as passport or driver's licence details;
- national/tax identification number;
- proof of address such as utility bills and bank statements;
- information about your income and wealth including details about your assets and liabilities, account balances, tax and financial statements
- financial information including bank;
- location data
- trading experience;
- transaction history;
- other personal information we require to meet your needs and provide our services to you.

We obtain this information through your use of our services or other dealings with us including through any of our websites, apps, the account opening applications, demo sign up, webinar sign up, subscribing to news updates and from information provided in the course of ongoing customer communication.

This information is held by us on servers based in the United Kingdom. In addition, when you interact with our services, our servers keep an activity log unique to you that collects certain administrative and traffic information including: source IP address, time of access, date of access, web page(s) visited, language used, software crash reports and type of browser used. This information is essential for the provision and quality of the services. We do not collect personal information about you while using the services without your knowledge.

We collect information about visitors to our premises. We may record information on your visit, including the date and time, who you are visiting, your name, employer, contact details and vehicle registration number.

We may record any communications, electronic, by telephone, in person or otherwise, that we have with you in relation to the services we provide to you and our relationship with you. These recordings will be our sole property and constitute evidence of the communications between us. Any telephone conversation may be recorded without the use of a warning tone or any other further notice.

Management of personal information

We always take appropriate technical and organisational measures to ensure that your information is secure to ensure your personal information is protected from misuse, interference or loss, and unauthorised access, modification or disclosure. Your personal information is generally stored in our computer database. Any paper files are stored in secure areas. In relation to information that is held on our computer database, we apply the following guidelines:

- passwords are required to access the system and passwords are routinely checked;
- data ownership is clearly defined;
- employees have restricted access to certain sections of the system;
- the system automatically logs and reviews all unauthorised access attempts;
- unauthorised employees are barred from updating and editing personal information;
- all computers which contain personal information are secured both physically and electronically;
- data is encrypted during transmission over the network; and
- print reporting of data containing personal information is limited.

We train our employees who handle personal information to respect the confidentiality of customer information and the privacy of individuals. We regard breaches of your privacy very seriously and will impose appropriate penalties, including dismissal where necessary.

How do we store personal information and for how long

Safeguarding the privacy of your information is important to us, whether you interact with us personally, by phone, by mail, over the internet or any other electronic medium. We hold personal information in a combination of secure computer storage facilities and paper-based files and other records and take steps to protect the personal information we hold from misuse, loss, unauthorised access, modification or disclosure. When we consider that personal information is no longer needed, we will remove any details that will identify you or we will securely destroy the records.

However, we may need to maintain records for a significant period of time. For example, we are subject to certain anti-money laundering laws which require us to retain:

- a copy of the documents we used to comply with our customer due diligence obligations; and
- supporting evidence and records of transactions with you and your relationship with us, for a period of five years after our business relationship with you has ended.

Means of collecting and processing personal information

We generally collect personal information directly from you. For example, personal information will be collected through our application processes, forms and other interactions

with you during providing our services, including when you visit our website, call us or send us correspondence. We will only use the personal information as set out in this Privacy Policy. We will not retain or have access to any debit/credit card information. We will not collect sensitive information about you without your consent unless an exemption in the regulations applies. These exceptions include if the collection is required or authorised by law or necessary to take appropriate action in relation to suspected unlawful activity or serious misconduct.

If you do not provide us with the personal information we request, we may not be able to provide you with our products or services or meet your needs appropriately.

We may also collect personal information about you from a third party, or share information with a third party, such as identity verification services, regulators, your introducing broker, marketing agencies, online vendors and service providers, and from customer lists lawfully acquired from third parties. In addition, we may engage the services of third-party service providers to provide technical support, process your online transactions and maintain your account. We take steps to ensure that our arrangements with third-party service providers and online vendors protect your privacy. Any personal information will only be disclosed to third parties in accordance with this Privacy Policy. We do not sell or rent your personal information.

Information use

We use the personal information we collect from you to deliver our services, to provide client support, to undertake necessary security and identify verification checks, to comply with relevant laws and regulations and other legal obligations, to process any of your online transactions, to assist your participation in third-party promotions, meet certain business requirements and for any other purpose related to the operation of the services. Your personal information may also be used by us to provide you with promotional offers and information regarding our products and services and in order for us to better provide a range of products and services and improved customer service. From time-to-time, we may request information from you via surveys or contests. Participation in these surveys or contests is completely voluntary, and, therefore, you have the choice of whether or not to disclose such information. Information requested may include contact information (such as name, correspondence address and telephone number), and demographic information (such as postal code or age).

Certain excluded disclosures

We may disclose your personal information if required to do so by law, or if we believe in good faith that such action is necessary to:
(1) comply with any legal process served on us or in circumstances where we are under a substantially similar legal or regulatory obligation;
(2) protect and defend our rights or property; or
(3) act to protect the personal safety of users of the services or the public. If, in our sole determination, you are found to have cheated or attempted to defraud us, our Affiliates, or any other user of the Services in any way including, but not limited to, price manipulation or payment fraud, including use of stolen credit cards, or any other fraudulent activity (including any chargeback or other reversal of a payment) or prohibited transaction (including money laundering).

We reserve the right to share this information (together with your identity) with other financial CFD providers, banks, credit card companies, and appropriate regulatory and legal agencies.

Transfer of personal data abroad

We may need to transfer your information to other group companies or service providers in countries in or outside the EEA (European Economic Area). This may happen if our servers or suppliers and service providers are located elsewhere. When we transfer your personal data outside the EEA, 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 EEA.

3 Your rights relating to your Personal Data

- You have the right to be informed
- You have the right to check what personal information is held by us
- You have the right to Rectify your data
- You have the right to Remove your data (Erasure)
- You have the right to "Opt out"
- You have the right to object to processing of your Personal Data
- You have the right to request the restriction of processing of your Personal Data
- You have the right to request the transfer of your Personal Data
- You have the right to withdraw consent

4 Complaint and Contact

If you are concerned about us ensuring your privacy, you can make a complaint. We will act upon it promptly. To make a complaint, please e-mail us at compliance@thinkmarkets.com.

We aim to address any request, query, complaint or question you have about your personal information. If you are not satisfied with the way we handled your response, or you believe we have not adequately resolved a matter, you have the right to complain to the Information Commissioner's Officer (the 'ICO'). You can find further details on the ICO website at https://ico.org.uk/

You have a right, at any time, to complain to the ICO. As an independent UK authority, it upholds information rights in the public interest, promotes openness by public bodies and

data privacy for individuals.

TF Global Markets (UK) Ltd is registered with the Information Commissioner's Office, registration number ZA277470.

You can contact us as set out below:

TF Global Markets (UK) Ltd
G07, 35 New Broad St,
London EC2M 1NH
compliance@thinkmarkets.com
Tel: 0044 2035142374