

## PRIVACY NOTICE

As part of our day-to-day business we need to collect personal information from our customers and potential customers to ensure that we can meet their needs for a range of financial services and to provide them with information about our services.

Your privacy is important to us and it is our policy to respect the confidentiality of information and the privacy of individuals. This notice outlines how we manage your personal information supplied to us by you or a third party in connection with our provision of services to you or which we collect from your use of our services and/or our app(s) or website(s). It also details your rights with respect to our processing of your personal information.

Our privacy notice will be reviewed from time to time to take into account new obligations and technology, changes to our operations and practices and to make sure it remains appropriate to the changing environment. Any personal information we hold will be governed by our most current privacy notice.

Please note that if you are an IG employee, an IG contractor or a third party service provider, your personal information will be used in connection with your employment contract, your contractual relationship or under separate policies that we provide to you independently of this document.

Any reference to 'you', 'your', 'yours' or 'yourself' in this privacy notice is a reference to any of our customers and potential customers as the context requires unless otherwise stated.

### WHO ARE WE?

This privacy notice applies to the processing of personal information by IG Europe GmbH, Westhafenplatz 1, 60327 Frankfurt, Germany (hereinafter referred to as 'us', 'our', 'we' or 'IG') in connection with the provision of financial services.

### WHAT KIND OF PERSONAL INFORMATION DO WE PROCESS?

If you are an existing or a potential customer, we collect and process the following types of personal information:

- name, address and contact details;
- date of birth and gender;
- information about your income and wealth including details about your assets and liabilities, account balances, trading statements, tax and financial statements;
- profession and employment details;
- location information;
- trading performance;
- data on business initiation and ongoing business relationship (including date, time, communication channel, copy of correspondence, records of communication);
- other similar information in connection with the provision of our financial services.

We may also collect this information about you through your use of our services or in the course of other business transactions between you and us. These include, but are not limited to, the IG websites, apps, account opening applications, our demo account registration forms, webinar registration forms, news subscriptions and information provided in the course of ongoing customer service correspondence. We may also collect such information about you from third parties, either through third-party marketing lists we purchase or from publicly available sources (such as debtor directories, land registers, trade and association registers, the press, the Internet) or through our Refer a Friend Program.

We also keep records of your trading behaviour, including a record of:

- products you trade with us and their performance;
- products we trade on your behalf and their performance;
- historical information about the trades and investments you have made including the amount invested;
- your preference for certain types of products and services;
- your use of our market data.

We may also obtain personal information about you through your use of our websites (including www.dailyfx.com), or apps. This is achieved by using cookies on our websites and/or apps, which in particular record which pages you view on our websites.

We may ask for other personal information voluntarily from time to time (for example, through market research, surveys or special offers). If you choose not to provide the information we need to fulfil your request for a specific product or service, we may not be able to provide you with the requested product or service.

### Recording of telephone conversations

We record the communication that takes place between you and us in relation to the transactions made with you and the provision of services relating to the acceptance, transmission and execution of your orders. This applies regardless of whether the communication is in electronic form, by telephone, in person or by other means. These recordings will be our sole property and will constitute evidence of the communications between us. Such telephone conversations may be recorded without the use of a warning tone or any other further notice.

In addition, we record telephone conversations with you for verification and quality assurance purposes, provided you have given us your consent.

Further, if you visit any of our offices or premises, we may have CCTV which will record your image.

You will find information on the purposes and legal bases used by us for these information processing operations in the 'Information on data processing' contained in the data protection information available on our website.

### WHO MAY WE DISCLOSE PERSONAL INFORMATION TO?

In the course of processing your personal information for the purposes stated in the 'Information on data processing' (available on our website in the data protection information), we pass on information to the following recipients:

- other companies within the IG Group who provide financial and other back office services;
- service providers and specialist advisers who have been contracted to provide us with administrative, IT, financial, regulatory, compliance, insurance, research or other services;
- introducing brokers with whom we have a mutual relationship;
- credit providers, courts, tribunals and applicable regulatory authorities as agreed or authorised by law or our agreement with you;
- credit reporting or reference agencies;
- anyone authorised by you.

Generally, we require organisations that are not part of the IG Group and process personal information to respect the confidentiality of that information, to undertake to respect the privacy of individuals, and to comply with all applicable data protection laws and this privacy notice.

With regard to transfers of personal information to companies outside of the EU or the European Economic Area, refer to the section below entitled 'Transfers outside of the European Economic Area'.

Third party service providers such as credit referencing agencies may keep a record of any searches performed on our behalf and may use the search details to assist other companies in performing their searches.

Please note that the use of your personal information by external third parties who act as data controllers for the processing of your personal information is not covered by this privacy notice and is not subject to our privacy standards and procedures.

## HOW DO WE OBTAIN YOUR CONSENT?

Where our use of your personal information requires your consent, such consent will be provided in accordance with the applicable customer agreement available on our website(s) or any other contract we may have entered into with you or as set out in our communication with you from time to time.

If we rely on your consent as our legal basis for processing your personal information, you have the right to withdraw that consent at any time by contacting us using the contact details specified in this privacy notice.

## PROTECTION OF PERSONAL DATA

We always take appropriate technical and organisational measures to ensure that your information is secure. In particular, 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.

We have appointed a Security Information Officer to ensure that our management of personal information is in accordance with this privacy notice and the applicable legislation.

You can reach our data protection officer as follows: [dpo-europe@ig.com](mailto:dpo-europe@ig.com)

## 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 bound by certain anti-money laundering laws, that require us to maintain records of the services we provide for a period of five years from the date of their creation.

If we hold any personal information in the form of a deed, we will hold this deed in its complete form for a period of 12 years after our business relationship with you has ended.

We will retain the recorded communication between you and us in relation to the transactions made with you and the provision of services relating to the acceptance, transmission and execution of your orders for a period of five (5), seven (7) or ten (10) years in accordance with regulatory requirements.

Where you have opted out of receiving marketing communications we will hold your details on our suppression list so that we know you do not want to receive these communications.

## TRANSFERS OUTSIDE OF THE EUROPEAN ECONOMIC AREA

We may transfer your personal information outside of the European Economic Area to other IG Group companies as well as processors who are engaged on our behalf ('Transferees'). For example, currently we have other IG Group companies located in the USA, Singapore, Australia, Japan, China, India, the UAE, South Africa and Switzerland. To the extent we transfer your information outside the European Economic Area, we will ensure that the transfer is lawful and that there are appropriate security arrangements.

In order to transfer personal information to third parties residing in regions that do not have an adequate level of data protection, we enter into agreements with the transfer recipients that provide adequate and appropriate protection through standard contractual clauses introduced by the European Commission. Where we make transfers to Transferees in the US, we may in some cases rely on applicable standard contractual clauses, binding corporate rules, the EU-US Privacy Shield or any other equivalent applicable arrangements. If you would like a copy of such arrangements, please contact us using the contact details below.

## THE PERSONAL INFORMATION WE HOLD ABOUT YOU

For more information about what rights you may have with respect to the personal information we hold about you, please refer to our 'Information on data processing' which can be found on our website in the data protection information.

### COOKIES

#### • WHAT IS A COOKIE AND HOW DO WE USE COOKIES?

A cookie is a small pieces of text stored on your computer or device when you visit a website or an app.

We use cookies on our websites or our apps to provide you with a more relevant and effective experience, including presenting web pages according to your needs or preferences. For further information about cookies and how we use cookies, please refer to our website.

#### • TECHNOLOGY IMPROVEMENTS

We are constantly striving to improve the functionality of our website through technology changes. This may mean a change to the way in which personal information is collected or used. The impact of any technology changes which may affect your privacy will be notified in this privacy notice at the time of the change.

#### • LINKS TO THIRD PARTY WEBSITES

Our websites or our apps may have links to external third party websites. Please note, however, that third party websites are not covered by this privacy notice and those sites are not subject to our privacy standards and procedures. Please check with each third party as to their privacy practices and procedures.

## WHAT IF YOU HAVE A COMPLAINT?

If you have a concern about any aspect of our privacy practices, you can make a complaint. This will be acted upon promptly. To file a complaint, please contact us using one of the contact options below.

If you are not satisfied with our response to your complaint, you have the right to lodge a complaint with a data protection authority, in particular in the EU Member State where you are residing or working or where there has been an alleged breach of applicable data protection laws.

## HOW TO CONTACT US

If you have any questions about this privacy notice or want to exercise your rights, please contact us by:

- telephone on 0800 195 8009 (+44 20 7896 0011);
- email [helpdesk.uk@ig.com](mailto:helpdesk.uk@ig.com);
- post to the address provided in the 'Who are we?' section of this privacy notice.

This policy will govern all dealings between IG ('us', 'our' and 'we' as appropriate) and the applicant customer ('you', 'your', 'yours' and 'yourself' as appropriate) during the application process. Once you open an account with us, your dealings with us will be governed by the applicable customer agreement for that account type. In return for us granting you access to the Electronic Trading Services, you agree to the following terms.

For the purposes of this policy, 'Electronic Trading Services' means any electronic services (together with any related software or application) accessible by whatever means we grant you access to or make available to you either directly or through a third party service provider.

You will take all reasonable steps to ensure that no computer viruses, worms, software bombs or similar items are introduced into any computer hardware, software, applications, equipment or network facilities you use to access our Electronic Trading Services.

We and our licensors (as the case may be) will retain the intellectual property rights to all elements of the software and such software and databases contained within our Electronic Trading Services and you will not in any circumstances obtain title or interest in such elements.

With respect to any market data or other information that we or any third party service provider provide to you in connection with your use of any Electronic

Trading Services, you agree that: (a) we and any such provider are not responsible or liable if such data or information is inaccurate or incomplete in any respect; (b) we and any such provider are not responsible or liable for any actions that you take or do not take based on such data or information; (c) such data or information is proprietary to us and any such provider and you will not retransmit, redistribute, publish, disclose or display in whole or in part such data or information to third parties except as required by applicable regulations or as agreed between us; (d) you will use such data or information solely in compliance with applicable regulations and this policy; and (e) we may at our absolute discretion remove your access to market data at any time. In respect of IG only, the provisions under (a) and (b) do not apply to gross negligence or wilful misconduct.

No one other than a party to this policy, their successors and permitted assignees shall have any right to enforce any of its terms.

This policy and all our dealings with you are in all respects governed by and construed in accordance with German law. The German courts will have non-exclusive jurisdiction to settle any legal action or proceedings arising out of or in connection with this policy, including any non-contractual disputes and claims. Nothing in this term will prevent us from bringing proceedings against you in any other jurisdiction.

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### IG EUROPE GMBH

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