

Limpid Markets Ltd

Privacy policy

1. Introduction

- 1.1 We are committed to safeguarding the privacy of our website and service users.
- 1.2 This policy applies where we are acting as a data controller with respect to the personal data of our website visitors and service users; in other words, where we determine the purposes and means of the processing of that personal data.
- 1.3 In this policy, "we", "us" and "our" refer to Limpid Markets Ltd. For more information about us, see Section 12 below.

2. How we use your personal data

- 2.1 In this Section 2 we have set out:
 - (a) the general categories of personal data that we may process;
 - (b) in the case of personal data that we did not obtain directly from you, the source and specific categories of that data;
 - (c) the purposes for which we may process personal data; and
 - (d) the legal bases of the processing.
- 2.2 We may process data about your use of our website and services ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system. This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website and services.
- 2.3 We may process your account data ("**account data**"). The account data may include your name and email address, your organisation, your phone number, your trading names, your notification settings, your floor broker and your counterparty settings. The source of the account data is you or your employer. The account data may be processed for the purposes of operating our website, providing our services (including compliance services provided to any of our customers), providing support, sending you our newsletter and other informative material regarding our services, gathering feedback, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is our legitimate interests, namely the proper operation and administration of our website and business.

- 2.4 We may process your personal data that are provided in the course of the use of our services ("**service data**"). The service data may include your tentative prices, "shows", response to "shows" and tentative confirmation details. The source of the service data is you or your employer. The service data may be processed for the purposes of operating our website, providing our services (including compliance services provided to any of our customers), providing support, sending you our newsletter and other informative material regarding our services, gathering feedback, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is our legitimate interests, namely the proper operation and administration of our website and business.
- 2.5 We may process information that you provide to us for the purpose of subscribing you to service updates and other notifications associated with our services ("**notification data**"). The notification data may be processed for the purposes of sending you the relevant updates and/or notifications. The legal basis for this processing is our legitimate interests, namely communications with our customers and users.
- 2.6 We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.
- 2.7 Please do not supply any other person's personal data to us, unless we prompt you to do so.

3. Providing your personal data to others

- 3.1 We may disclose your personal data to our suppliers or subcontractors in the following categories insofar as reasonably necessary for the provision, the maintenance and the enhancement of our services:
- (a) hosting and hosting infrastructure services (our current provider of these services is Amazon Web Services, Inc); and
 - (b) communications services (our current providers of these services are Google, Inc and The Rocket Science Group LLC trading as MailChimp).
- 3.2 The servers used by these suppliers and subcontractors are situated either within the European Economic Area (EEA) or the United States of America (USA). Transfers from within the EEA to the USA will be protected by appropriate safeguards, namely the use of the Privacy Shield scheme and/or standard data protection clauses adopted or approved by the European Commission. For more information, see:

<https://www.privacyshield.gov/welcome>

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32010D0087>

- 3.3 As part of our compliance services we may provide to a customer any of your personal data relating to any action and communication such as "show" or tentative confirmation you went through with respect to that customer. (That customer will be a data controller in its own right with respect to any of your personal data that we supply in accordance with this Section 3.3.)
- 3.4 In addition to the specific disclosures of personal data set out in this Section 3, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

4. Retaining and deleting personal data

- 4.1 We will retain your personal data for a period of between 10 and 11 years following the end of the year of collection of that personal data. At the end of the retention period, we will irrevocably delete or anonymise the personal data. We retain the data for this period to enable us to provide compliance services to our customers.
- 4.2 Notwithstanding Section 4.1, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person, or where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

5. Security of personal data

- 5.1 We will take appropriate technical and organisational precautions to secure your personal data and to prevent the loss, misuse or alteration of your personal data.
- 5.2 The following personal data will be stored by us in encrypted form: your organisation, password, usage data and service data.
- 5.3 Data that is sent from your web browser to our web server, or from our web server to your web browser, will be protected using encryption technology.
- 5.4 You acknowledge that the transmission of unencrypted (or inadequately encrypted) data over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.
- 5.5 You should ensure that your password is not susceptible to being guessed, whether by a person or a computer program. You are responsible for keeping the password you use for accessing our website confidential and we will not ask you for your password (except when you log in to our website).

6. Amendments

- 6.1 We may update this policy from time to time by publishing a new version on our website.
- 6.2 You should check this page occasionally to ensure you are happy with any changes to this policy.
- 6.3 We may notify you by email of significant changes to this policy.

7. Your rights

- 7.1 In this Section 7, we have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.
- 7.2 Your principal rights under data protection law are:
 - (a) the right to access;
 - (b) the right to rectification;
 - (c) the right to erasure;
 - (d) the right to restrict processing;
 - (e) the right to object to processing;
 - (f) the right to data portability;
 - (g) the right to complain to a supervisory authority; and
 - (h) the right to withdraw consent.
- 7.3 You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee.
- 7.4 You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.
- 7.5 In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are exclusions of the right to

erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.

- 7.6 In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.
- 7.7 You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.
- 7.8 You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.
- 7.9 You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.
- 7.10 To the extent that the legal basis for our processing of your personal data is:
- (a) consent; or
 - (b) that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract,

and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

- 7.11 If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.
- 7.12 To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.
- 7.13 You may exercise any of your rights in relation to your personal data by written notice to us.

8. Updating information

- 8.1 Please let us know if the personal information that we hold about you needs to be corrected or updated.

9. About cookies

- 9.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.
- 9.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.
- 9.3 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

10. Cookies that we use

- 10.1 We use cookies for authentication only: to identify you when you visit our website and as you navigate our website.

11. Managing cookies

- 11.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- (a) <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
- (b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- (c) <http://www.opera.com/help/tutorials/security/cookies/> (Opera);

- (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- (e) <https://support.apple.com/kb/PH21411> (Safari); and
- (f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

11.2 Blocking all cookies will have a negative impact upon the usability of many websites.

11.3 If you block cookies, you will not be able to use all the features on our website.

12. Our details

12.1 This website is owned and operated by Limpid Markets Ltd.

12.2 We are registered in Jersey under registration number 113113, and our registered office is at 17 Bond Street, St. Helier, Jersey, JE2 3NP.

12.3 You can contact us:

- (a) using our website contact form; or
- (b) by email, using the email address published on our website from time to time.

13. Representative within the European Union

13.1 Our representative within the European Union with respect to our obligations under data protection law is Bella Eldred-Smith and you can contact our representative by sending her an email at bella.eldred-smith@limpidmarkets.com.