



Privacy Notice

As part of our day-to-day business, we need to collect personal information from our clients and potential clients to ensure that we can meet their needs for a range of financial services and 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 platform(s) or website(s). It also details your rights in respect of our processing of your personal information.

Our privacy notice will be reviewed from time to time to take account of 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) Carlton Limited employee, a contractor to) Carlton Limited or a third-party service provider, your personal information will be used in connection with your employment contract, your contractual relationship or in accordance with our separate policies which are available by contacting us.

Any reference to 'us', 'our', 'we' or 'Carlton' in this privacy notice is a reference to each group company within the Carlton Limited group of companies as the context requires unless otherwise stated. Similarly, any reference to 'you', 'your', 'yours' or 'yourself' in this privacy notice is a reference to any of our clients and potential clients as the context requires unless otherwise stated.

Please note that if you are considered a Client pursuant to the Client Agreement, then this Privacy Notice shall form part of the Client Agreement, as amended from time to time. Any capitalized term not defined in this Privacy Notice shall have the meaning ascribed to it in the Client Agreement.

We may amend this Privacy Notice from time to time and it shall apply to you once it is published on our Website. Please ensure to check our Website regularly.

WHO ARE WE?

This privacy notice applies to the processing activities of the Carlton Limited

WHAT KIND OF PERSONAL INFORMATION DO WE COLLECT?

If you are an actual or potential client, we may collect the following types of information about you:

- 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 data
- trading performance
- any other similar information

We obtain this information in a number of ways through your use of our services or other dealings with us including through Carlton website, platforms, the account opening applications, our demo sign up forms, subscribing to news updates and from information provided in the course of ongoing client service



correspondence. We may also collect this information about you from third parties either through bought-in third party marketing lists, publicly available sources or through our refer a friend scheme. We also keep records of your trading behavior, including a record of:

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

We may also obtain personal information about you through your use of our website, platform or through the use of cookies on our websites and/or apps, in particular by recording which pages you look at 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.

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 will constitute evidence of the communications between us.

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

WHO MAY WE DISCLOSE PERSONAL INFORMATION TO?

As part of using your personal information for the purposes set out above, we may disclose your information to:

- other companies within the Carlton group of companies 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 authorized by law or our agreement with you
- anyone authorized by you

Generally, we require that organizations outside the Carlton group who handle or obtain personal information acknowledge the confidentiality of this information, undertake to respect any individual's right to privacy and comply with the all relevant data protection laws and this privacy notice.

Please note that the use of your personal information by external third parties who act as data controllers 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 client agreement available on our website 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 set out in this privacy notice.



MANAGEMENT OF PERSONAL INFORMATION

We always take appropriate technical and organizational measures to ensure that your information is secure. In particular, we train our employees who handle personal information to respect the confidentiality of client 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, unauthorized 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 client 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.

If we hold any personal information in the form of a recorded communication, by telephone, electronic, in person or otherwise, this information will be held in line with local regulatory requirements which will either be 5 years or 10 years after our business relationship with you has ended.

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 the European Economic Area to other Carlton related entities as well as processors who are engaged on our behalf. For example, currently we have other Carlton related entities located in Cyprus, Vanuatu, Jordan, and other jurisdictions. 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. We may also transfer our servers to other jurisdictions.

THE PERSONAL INFORMATION WE HOLD ABOUT YOU

For further information about any rights that might be available to you in relation to the personal information we hold about you, please refer to our website.

COOKIES

WHAT IS A COOKIE AND HOW DO WE USE COOKIES?

A cookie is a small piece 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.



TECHNOLOGY IMPROVEMENTS

We are constantly striving to improve functionality on this site 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.