



FINANCIAL TRADING DIMENSIONS

FTD LIMITED

PRIVACY POLICY

EFFECTIVE JANUARY 2020

FTD LIMITED - VOL 1

FTD Limited is licensed and regulated by the BVI Financial Services Commission under Investment Business License number SIBA/L/19/1123



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FTD LIMITED

British Virgin Islands, Company Registration no: 1944994

Registered address: Kingston Chambers, PO Box 173, Road Town, Tortola, BVI

Authorized and regulated by the BVI Financial Services Commissions,

License: SIBA/L/19/1123



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1. INTRODUCTION

Under the rules of the BVI Financial Services Commission, this policy provides information on the Privacy Policy for FTD Limited (together referred as “FTD”, “we”, “our” or “us”) (the “Privacy Policy”).

FTD needs to collect personal information from our customers in order to provide them with our products (to open and maintain customer account), services and any relevant information. We are committed to protecting your personal information. This Privacy Policy applies to personal information collected by FTD.

Our Privacy Policy is reviewed and updated regularly in order to be compliant with data protection laws and other privacy regulations.

2. PRIVACY PROTECTION

FTD respects the privacy of any users who access its website and therefore is committed to taking all necessary steps to safeguard the privacy and confidential information of all customers and visitors of our website. To ensure this, FTD has trained its staff on the importance of protecting and respecting customer personal information and privacy.

The personal information you provide us with when registering yourself as a user of the Company’s website or of its services is classified as registered information, which is protected in several different ways. You can access your registered information after logging into FTD Customer’s Portal.

It is your responsibility to make sure that your password is only known by you and not disclosed to anyone else. Customer’s registered information is securely stored with us, and only authorized staff have access to this information. Please also note that the transfer of information via the internet is not always entirely secure, but we have taken significant precautions to assure that your personal data is being protected.

3. INFORMATION COLLECTED BY FTD

As part of our application process and in order to open any type of trading account with us, you must first complete and submit an application form with all the required information. By completing this application form, you are requested to disclose personal information in order to enable FTD to assess your application and comply with the relevant laws. The information you provide may also be used by us to inform you regarding our services.



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The information that we may collect from you includes the following;

- Full Name
- Address of Domicile / Postal Address
- Contact Details (e.g. telephone number, email address, etc.)
- Date of birth, Occupation, Gender, Nationality
- Information about the Customer Income and Wealth, Source of Funds, Assets and Liabilities, Bank Account Information, Trading Statements
- Trading Account Balances, Trading Activity, Your inquiries and our responses
- Employment details
- Authentication Data (e.g. signature)
- Location data
- Trading performance, Knowledge and Experience
- Verification information, which includes information necessary to verify your identities such as a passport, national id card or driver's license. Furthermore, we may collect other identifiable information, such as identification numbers and/or passport/tax registration numbers.
- Any other information used to identify you and about your trading experience which is relevant to us for providing our services to you.

We obtain this information in a number of ways through your use of our services, including through any of our websites, apps, the account opening applications, our demo account registration form or customer service communications. We may also collect this information about you from the third parties such as your payment providers and through publicly available sources. We also keep records of your trading behaviour, including records regarding the following;

- Financial products you trade with us and their performance
- Historical data about the trades and investments you have made, including the amount invested
- Contact details (e.g. telephone number, email address, etc.)
- Date of birth, Occupation, Gender, Nationality
- Customer preference for certain types of financial products and services

If you choose not to provide the information, we need to fulfill 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 business relationship with you. 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.



4. PROCESSING OF YOUR PERSONAL INFORMATION

We may process your personal information on the following bases and for the following purposes;

• PERFORMANCE OF A CONTRACT

We process personal data in order to provide our services and products, as well as information regarding our products and services based on the contractual relationship to our customers. In addition, the processing of personal data takes place to be able to complete our customer on-boarding /acceptance procedures.

In view of the above, we need to verify your identity in order to accept you as our customer and we will need to use those details in order to effectively manage your trading account with us. This may include third parties carrying out credit or identity checks on our behalf. The use of your personal information is necessary for us to know who you are as we have a legal obligation to comply with 'Know Your Customer' and customer due diligence regulatory obligations.

• COMPLIANCE WITH A LEGAL OBLIGATION

There are a number of legal obligations imposed by relevant laws to which we are subject, as well as specific statutory requirements (e.g. anti-money laundering laws, financial services laws, corporation laws, privacy laws and tax laws). There are also various supervisory authorities whose laws and regulations apply to us. Such obligations and requirements impose on us necessary personal data processing activities for credit checks, identity verification, payment processing, compliance with court orders, tax law or other reporting obligations and anti-money laundering controls. These obligations apply at various times, including customer on-boarding / acceptance, payments and systemic checks for risk management.

• FOR THE PURPOSES OF SAFEGUARDING LEGITIMATE INTERESTS

We process personal data so as to safeguard the legitimate interests pursued by us or by a third party. A legitimate interest is when we have a business or commercial reason to use your information.

Examples of such processing activities include the following;

- Initiating legal claims and preparing our defence in litigation procedures
- Risk management
- Measures to manage the business and for further developing financial products and services
- Measures to ensure IT and system security, preventing potential crime, asset security, admittance controls and anti-trespassing measures
- Sharing your personal data within FTD for the purpose of updating/verifying your personal data in accordance with the relevant anti-money laundering compliance framework

• YOU HAVE PROVIDED YOUR CONSENT

Our storage and use of your personal data is based on your consent. You may revoke consent at any time; however, any processing of personal data prior to the receipt of your revocation will not be affected.



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• **TO PROVIDE CUSTOMER WITH PRODUCTS AND SERVICES, OR INFORMATION ABOUT OUR PRODUCTS AND SERVICES, AND TO REVIEW THEIR ONGOING NEEDS**

Once you successfully open a trading account with us or subscribe to an update, we will need to use your personal data to perform our services and comply with our obligations to you. It is also in our legitimate interests to try to ensure that we are providing the best products and services so we may periodically review your needs based on our assessment of your personal information to try to ensure that you are getting the benefit of the best possible products and services from us.

• **TO INVESTIGATE OR SETTLE ENQUIRIES OR DISPUTES**

FTD may need to use personal information collected from you to investigate issues or to settle disputes with you because it is in our legitimate interests to ensure that issues and disputes get investigated and resolved in a timely and efficient manner.

• **TO COMPLY WITH APPLICABLE LAWS, COURT ORDERS, OTHER JUDICIAL PROCESS, OR THE REQUIREMENTS OF ANY APPLICABLE REGULATORY AUTHORITIES**

FTD may need to use your personal information to comply with any applicable laws and regulations, court orders or other judicial processes, or the requirements of any applicable regulatory authority. We do this not only to comply with our legal obligations but because it may also be in our legitimate interest to do so.

• **DATA ANALYSIS**

Our webpages and emails may contain data analysing tools that allow us to track receipt of correspondence and count the number of users that have visited our webpage or opened our correspondence. We may aggregate your personal information with the personal information of our other customers on an anonymous basis. If your personal information is not in an anonymized form, it is in our legitimate interest to continually evaluate that personal information to ensure that the products and services we provide are relevant to the market.

• **MARKETING PURPOSES**

We may use your personal information to send you marketing communications by email, phone, SMS or other methods to ensure that you are kept up to date with our latest products and services. We will not disclose your information to any outside parties that may allow them to directly market to you.

• **INTERNAL BUSINESS PURPOSES AND RECORD KEEPING**

We may use your personal information for internal business and research or record-keeping purposes. Such processing is in our own legitimate interests and is required in order to comply with our legal obligations. This may include any communications that we have with you in relation to the services and products we provide to you. We will also keep records to ensure that you comply with your contractual obligations pursuant to the agreement governing our relationship with you.



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• LEGAL NOTIFICATIONS

Often the regulatory law requires us to advise you of certain changes to products or services or laws. We may need to inform you of any changes to the terms of the features of our products or services. We need to process your personal information to send you these legal notifications. You will continue to receive this information from us even if you choose not to receive direct marketing information from us.

• PHYSICAL SECURITY

If you enter any of our offices, we may record your image on our CCTV for security reasons. We may also take your details to keep a record of who has entered our office on any given day. It is in our legitimate interest to do this to maintain a safe and secure working environment.

5. DISCLOSURE OF CUSTOMER PERSONAL INFORMATION

FTD may use the information collected from you to verify your identity and contact. FTD may also use this information to establish and set up your trading or demo account, issue an account number and a secure password and maintain account activity.

The Company will not disclose any of its customer's confidential information to a third party, except:

- To regulatory authorities, courts and bodies as required by law or to service providers for internal investigations and reporting.
- If there is a duty to disclose.
- If our legitimate business interests require disclosure.

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

- Our associates and service providers, for business purposes, including third parties such as business service providers and specialist advisers who have been contracted to provide us with administrative, financial, legal, tax, compliance, insurance, research or other services.
- Introducing brokers with whom we enter a business agreement. When a customer is referred by an introducing broker, FTD generally shares nonpublic personal information concerning the account opening and maintenance process with the introducing broker who made the referral.
- FTD may provide information to Business Parties, Liquidity Providers, Courts and Regulatory Authorities as agreed or authorized by law.
- And anyone authorized by the customer.

If the Company discloses your personal information to business parties, such as banks, in order to perform the services requested by customers, such third parties may store your information in order to comply with their legal and other obligations.



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Customers accept and consent that the Company may, from time to time, analyze the data collected while visiting our website or by other means, such as questionnaires, for statistical purposes in order to improve the Company's business activities.

If you do not wish to have FTD Ltd share nonpublic personal information with non-affiliated third parties pursuant to any of the provisions listed, please opt- out of those provisions by sending an e-mail to compliance@ftdsystem.com or calling FTD Ltd at **+44 (0) 207 060 0383**. Opting out will apply for all financial products or services you obtain through FTD Ltd. Please note that you cannot opt-out of any provisions if sharing of the information is required by law. Further, please note that an opt-out election must be made for each separate account you hold at FTD Ltd.

6. CUSTOMER COLLECTED INFORMATION

Tracking systems used on FTD's website may collect your personal data in order to optimize the services provided to current or potential customers. The website collects information in the following ways;

• DEVICE INFORMATION

By recognizing your device used to access and use FTD's website.

• LOG INFORMATION

Logging certain behaviours on the website enable FTD to track user activity and therefore troubleshoot any issues that may occur.

• LOCATION INFORMATION

Using your IP address helps us localize our website content, on which we provide financial services to you based on the regulatory conditions of your residence, and also improve your user experience on our site.

• COOKIES

Cookies are text files with a small amount of data sent from our website to your browser and stored on your computer's hard drive. Cookies help us to improve the performance of our website and our future advertising campaigns.

7. COOKIES

A cookie is a small text file placed on your device that stores information about a user's use of a website. Tracking technologies, such as cookies and local shared objects may be used by our website. We use cookies for allowing the website to work and enhancing usability, as well as for providing information to us.

Cookies are frequently used on many websites on the internet, and you can choose if and how a cookie will be accepted by changing your preferences and options in your browser. You may not be able to access some parts of our website if you choose to disable the cookie acceptance in your browser, particularly in your FTD customer portal and other secure parts of our website. We, therefore, recommend you to enable cookie acceptance in order to benefit from all of our online services.



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Furthermore, we use cookies for re-marketing features in order to allow us to reach out to users who have previously visited our website and have shown an interest in our products and services. Periodically, we may use third party vendors to display our ads over the internet to you, based on your previous use of our website. You can opt-out this particular use of cookies at any time.

For further details about our cookie policy and how our cookies work, please read our cookies policy.

8. STORAGE OF YOUR PERSONAL INFORMATION AND RETENTION PERIOD

In relation to your personal information, we will hold this for as long as we have a business relationship with you, in a combination of secure computer storage facilities and paper-based files and other records and we take the necessary measures to protect the personal information we hold from misuse, loss, unauthorized access, modification or disclosure.

When we consider that personal information is no longer necessary for the purpose for which it was collected, 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. We are subject to certain anti-money laundering and regulatory laws which require us to retain the following, for a period of 5 years after our business relationship with you has ended:

- a copy of the documents we used in order to comply with our customer KYC and due diligence obligations
- supporting evidence and records of transactions with you and your relationship with us

Also, the personal information we hold in the form of recorded communication, by telephone, electronically, in person or otherwise, will be held in line with local regulatory requirements. If 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. If we keep your data longer than 5 years, it may be related for legal, regulatory or technical reasons.

9. CONFIDENTIALITY AND SECURITY PROCEDURES

Only the staff members for whom the information is necessary to complete a given transaction shall possess the authority to access the information. FTD, its personnel, and its affiliates shall strictly adhere to security practices and procedures to ensure the confidentiality of its customer's information.

FTD maintains numerous safeguards that comply with regulations to guard your nonpublic personal information including the use of encryption technology, firewalls and authentication systems. FTD will continue to protect the privacy of former customer's nonpublic personal information in the same manner as when they were customers. Unlike current customers, however, former customers will not receive annual privacy notices.



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10. SECURITY TECHNOLOGY

FTD uses encryption technology in order to protect certain information that is submitted. This technology protects you from having your information intercepted by anyone other than FTD while it is being transmitted to us. We work diligently to ensure that our Web sites are secure and that they meet industry standards. We also use other safeguards such as firewalls, authentication systems, and access control mechanisms to control unauthorized access to the customer portal, trading platform and any data related to customer information in our system.

11. RECTIFICATION

We will take all reasonable steps to make sure that your personal information remains accurate, complete and up-to-date. If the personal information we hold about you is inaccurate or incomplete, you are entitled to rectify. If we have disclosed your personal information to others, we will let them know about the rectification where possible. You may inform us at any time that your personal details have changed by e-mailing us at compliance@ftdsystem.com. The Company will change your personal information in accordance with your instructions. To proceed with such requests, in some cases we may need supporting documents from you as proof, that we are required to keep for regulatory or other legal purposes.

12. ERASURE

You can ask us to delete or remove your personal information in certain circumstances such as if we no longer need it or you withdraw your consent provided that we have no legal obligation to retain that data. Such request will be subject to any retention limits we are required to comply with in accordance with applicable laws and regulations. If we have disclosed your personal information to others, we will let them know about the erasure where possible.

13. LEGAL DISCLAIMER

The Company may disclose your personally identifiable information as required by rules and regulations and if the Company believes that disclosure is necessary to protect our rights or to comply with other proceedings, court order, legal process served or pursuant to governmental, intergovernmental or other regulatory bodies. The Company is not liable for misuse or loss of personal information or otherwise on the Company's website that the Company does not have access to or control over. The Company will not be liable for unlawful or unauthorized use of your personal information due to misuse or misplacement of your passwords, negligent or malicious intervention or otherwise by you or due to your acts or omissions or a person authorized by you.



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HOW TO CONTACT US

If you have any questions about our use of your personal information and/or concerns regarding this Privacy Policy, please e-mail us at compliance@ftdsystem.com

FTD LIMITED

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