



PRIVACY POLICY

1. Privacy statement

1.1 Personal data

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as: "any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

1.2 How we use your information

This privacy notice tells you how we, Avanza Limited, will collect and use your personal data for providing our services and keeping you updated with industry and legislative requirements.

1.3 Why does Avanza Limited need to collect and store personal data?

In order for us to provide you with a service we need to collect personal data for correspondence purposes and/or service provision. In any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

In terms of being contacted for marketing purposes Avanza Limited would contact you for additional consent.

1.4 Will Avanza Limited share my personal data with anyone else?

We may pass your personal data on to third-party service providers contracted to Avanza Limited in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide you on our behalf. When they no longer need your data to fulfil this service, they will dispose of the details in line with Avanza Limited's procedures. If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

1.5 How will Avanza Limited use the personal data it collects about me?

Avanza Limited will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. Avanza Limited is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.



1.6 Under what circumstances will Avanza Limited contact me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

1.7 Can I find out the personal data that Avanza Limited holds about me?

Avanza Limited at your request, can confirm what information we hold about you and how it is processed. If Avanza Limited does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data. In some cases, this will be a representative in the EU.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Avanza Limited or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.



1.8 What forms of ID will I need to provide in order to access this?

Avanza Limited will assess what is necessary to identify you as the data subject, when a subject access request is received. The information used to identify you will be deemed appropriate based on the personal data that we currently process on you, therefore we will not ask for data that is more sensitive in nature than we currently process.

Document Owner and Approval

The GDPR Owner is the owner of this document and is responsible for ensuring that this record is reviewed in line with the review requirements of the GDPR.

A current version of this document is available on request, or when new data subjects are accepted.

Signature:

Date: 25th October 2018

ENZO FRANGIAMORE

Avanza Limited

Change History Record

Issue	Description of Change	Approval	Date of Issue
1	Initial issue	Enzo Frangiamore	25 th Oct 2018