

## PRIVACY POLICY

This Privacy Policy (together with our Terms and Conditions as set out at <https://www.currencyglobal.com>) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it when providing you with foreign exchange and payment services (**the Services**).

Any definitions used in this Privacy Policy shall be as defined in the Terms and Conditions, the terms of which apply to this Privacy Policy.

For the purpose of the General Data Protection Regulation, the data controller is Currency Global Limited of 1 Poultry, London EC2R 8EJ, company registration number 09312253. Our data controller's ICO registration reference is ZA114413. You can contact us via telephone or email to find out how we use your personal information, or to exercise any of the data subject rights where applicable.

### A. YOUR PERSONAL INFORMATION AND WHY WE NEED IT

#### 1 Information you give us (Submitted Information)

1.1 You may give us information about you by filling in forms on our Website <https://www.currencyglobal.com> (**our Website**) or by corresponding with us by phone, e-mail or otherwise. This includes but is not limited to information you provide on registration when we open a Client Account, when you enter into a FX Contract, provide us with an FX Instruction or Payment Instruction and when you raise any queries or report a problem to us.

1.2 The information you give us may include name, address, e-mail address, phone number, financial and transactional information of you, an Authorised Person or a beneficiary. It will include all information collected from you on our registration form which may be submitted by you online or provided by you verbally and logged to our system.

#### 2 Information we collect about you (Collected Information)

2.1 We may from time to time collect personal information from trusted third parties such as credit reference agencies during eligibility and credit checks. We occasionally obtain information from public sources such as Government registers and social media sites.



### **3 Information about your device or computer (Technical Information)**

3.1 With regard to each of your visits to our Website we may automatically collect and send the following information: technical information, including the type of device you use, a unique device identifier (for example, your device's IMEI number, the MAC address of the device's wireless network interface, or the mobile phone number used by the device), unique application numbers, network information and your device's operating system.

3.2 Other technical information we may receive, includes the Internet protocol (IP) address used to connect your computer to the internet, plug-in types and versions, operating system and platform, the type and version of browser you use and time zone setting.

### **4 Use of the Services (Log Information)**

4.1 Details of your visits to our Website (including, but not limited to, traffic data) and the resources that you access may be sent to us automatically.

4.2 We may also receive information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.

### **5 How your information is used (the purpose and legal basis)**

5.1 We will use the information we receive from you for the following purposes:

- (a) to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and Services that you request from us;
- (b) to enable us to provide you with upgrades and other relevant information;
- (c) for our own internal business purposes and to analyse trends and usage which enables us to improve the products and services we provide;
- (d) to provide you with information about other products and services we offer that are similar to those that you have already purchased or enquired about;
- (e) to ensure that content from our Website is presented in the most effective manner for you and for your computer;



- (f) to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- (g) to comply with law and any obligations to our regulators including performing mandatory compliance checks; and
- (h) we may disclose your data to third parties in the limited circumstances set out below.

5.2 We may monitor, record and maintain records of any telephone conversations and emails between ourselves and you or your Authorised Person for as long as is necessary but usually no more than 5 years after the end of the business relationship for the following purposes:

- (a) internal training and quality control;
- (b) evidential purposes including in relation to money laundering or financial crime;
- (c) clarification of any instruction; and
- (d) to demonstrate compliance to our regulators.

## **B. DISCLOSURE OF YOUR INFORMATION AND WHO WE MAY SHARE IT WITH**

We may disclose your personal data to selected third parties for the following purposes:

- we may disclose your personal information to any member of our company group for internal business purposes;
- certain third parties including banks to enable us to process a transaction;
- to our suppliers of HR, IT, compliance and legal services;
- if we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation or request;
- credit reference agencies;
- government departments (such as Her Majesty's Revenue and Customs);
- financial regulatory bodies (such as The Financial Conduct Authority);

- law enforcement and fraud detection organisations;
- external auditors and accountants;
- advertisers and advertising networks that require the data to select and serve relevant adverts to you and others;
- analytics and search engine providers that assist us in the improvement and optimisation of our site;
- in order to:
  - enforce or apply the Terms and Conditions or investigate potential breaches; or
  - protect the rights, property or safety of Currency Global Limited, our customers, or others (including exchanging information for the purposes of fraud protection and credit risk reduction);

We will not disclose your personal information to anyone without your permission, unless:

- you have given us consent;
- Currency Global Limited or substantially all of its assets are sold to or acquired by a third party, in which case we may disclose or transfer your personal data to the prospective buyer;
- HM Revenue & Customs or UK Financial regulators require us to;
- law enforcement such as the NCA, if they require us to, in order to prevent crime or terrorism.

### **C. WHERE WE STORE YOUR PERSONAL DATA**

The data that we collect from you is processed by our staff here in the UK, however it may also be transferred to, and stored at, a destination outside the European Economic Area (**EEA**). It may also be processed by staff operating outside the EEA who work for us, one of our suppliers or other third parties including Salesforce, Microsoft and Mimecast. By submitting your personal data, you agree to this transfer, storing or processing. Data that we collect from you in hard copy may be stored electronically.



You are responsible for ensuring any password and Security Information used in relation to our Services is kept confidential and not provided to third parties.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data any transmission is at your own risk, we cannot guarantee the security of your data transmitted to our Website.

Any links which appear from advertisers on our Website are not in any way affiliated with us and we do not accept any responsibility or liability in respect of any personal data you submit to these websites or services.

Once we have received your information, we will use appropriate procedures and security features to try to prevent unauthorised access. All data transferred externally will be secure and encrypted via proprietary protocols such as SSL. Our servers are protected by dedicated physical and virtual firewalls and we have UK based contingency server and disaster recovery plans.

#### **D. COOKIES**

We use cookies to distinguish you from other users. This helps us to provide you with a good experience when you use our Website and also allows us to improve the services we provide. By continuing to visit our Website, you are agreeing to our use of cookies.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer. Some cookies are essential to the operation of the services we provide, for example we use a session cookie generated by Microsoft IIS which is random, not saved and removed on exit.

You may block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our Website.

You can find more information about the categories of cookies we use and the purposes for which we use them in our Cookies Policy at <https://www.currencyglobal.com/legal>.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control.

## E. YOUR RIGHTS

We may need to contact you from time to time with important information about the services we provide including new features or upgrades. We will not make your personal data available to third parties for marketing purposes or market any products to you other than those similar to or connected with the services we provide.

Our Website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

### **Right of access**

Any requests regarding your personal data, also known as a subject access request (SAR) will be provided free of charge. We have one month to respond but will always aim to get back to you sooner. You can request a copy of the personal information we hold about you, by contacting us on the details provided in the contact section below.

### **Right to rectification**

You have the right to request rectification of any personal information we hold about you, in order to keep your data as accurate as possible. While we do our best to keep information about you up-to-date and current, it is your responsibility to notify us about any changes.

### **Right to erasure ('right to be forgotten')**

You have the right to request the erasure of your personal information, where:

- it is no longer necessary in relation to the purpose for which it was collected;
- you withdraw consent on which the processing is based, where there is no legal ground for the processing;
- the personal data has been unlawfully processed;
- the data must be erased for compliance with a legal obligation.

In some cases, there may be a legitimate reason where we must retain some of your personal information after you have requested erasure. Circumstances include but are not limited to:

- our requirement to hold the data for compliance with a legal obligation;

- for the establishment, exercise or defence of legal claims.

### **Right to restriction of processing**

You may request the restriction of us processing your personal information where:

- you contest the accuracy of the data we hold, for a period enabling us to verify the accuracy;
- the processing is unlawful, you do not want to exercise your right to erasure but instead ask us to restrict processing;
- we no longer require the personal information, but you request us to retain the data, for the establishment, exercise or defence of legal claims.

### **Right to data portability**

You have the right to receive the personal information we hold about you, in a structured, commonly used and machine-readable format, and have the right to request us to transmit the data to another data controller where:

- the processing is based on consent;
- the processing is carried out by automated means;
- technically feasible.

### **Right to object**

You have the right to object to the processing of your personal information where the processing is carried out in the public interest, or in the exercise of official authority. However, we can continue to process your information if we can provide legitimate grounds which override your interests, such as the exercise or defence of legal claims.

You have the right to ask us not to process your personal data for marketing purposes, as well as any optional uses you may have previously consented. You can exercise your right to prevent such processing by unsubscribing following the link on any email. You can exercise the right at any time by contacting us on the details provided in the contact section below.



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## F. CHANGES TO OUR PRIVACY POLICY

Any changes we may make to our Privacy Policy in the future will be posted on our Website (<https://www.currencyglobal.com/legal>) and, where appropriate, notified to you by e-mail. The new terms may be displayed on-screen and you may be required to read and accept them to continue your use of our Website. Please check back frequently to see any updates or changes to our Privacy Policy.

## G. CONTACT

Questions, comments and requests regarding this Privacy Policy are welcomed. You can contact us by any of the following means:

- Write to us at Currency Global Limited, 1 Poultry, London, EC2R 8EJ, United Kingdom; or
- Email us at [support@currencyglobal.com](mailto:support@currencyglobal.com); or
- Call us on +44 (0)20 3876 5432.