



PRIVACY POLICY – CFH CLEARING LIMITED

CFH CLEARING LIMITED · V02/17

The information contained herein is the property of the CFH Group and its associated entities and may not be copied, used or disclosed in whole or in part outside of CFH Group without prior written permission.



PRIVACY POLICY – CFH CLEARING

CONTENTS

INTRODUCTION	3
WHAT INFORMATION DO WE COLLECT	3
COOKIES.....	3
SESSION COOKIES	3
PERSISTENT COOKIES	3
USING YOUR PERSONAL INFORMATION	3
DISCLOSURES	4
INFORMATION STORAGE AND DATA TRANSFER	4
SECURITY OF YOUR PERSONAL INFORMATION	5
POLICY AMENDMENTS	5
YOUR RIGHTS.....	5
THIRD PARTY WEBSITES	5
UPDATING INFORMATION	5
CONTACT.....	5
DATA CONTROLLER	5

CFH CLEARING LIMITED

Fourth Floor, 8 Lloyd's Avenue · London · EC3N 3EL · United Kingdom

Phone: +44 (0) 203 455 8751 · Email: legal@cfhclearing.com · Web: www.cfhclearing.com

Registered in England and Wales, No. 6557752
Authorised and regulated by the Financial Conduct Authority, FRN. 481853



PRIVACY POLICY – CFH CLEARING

PRIVACY POLICY

INTRODUCTION

At CFH Clearing, we are committed to safeguarding the privacy of our website visitors and clients. This policy sets out how we will treat your personal information. Once you are a client, or ask us to provide you with any of our products or services, you agree that we may handle your information including but not limited to your name, address, contact details and identity information in accordance with this Privacy Policy.

Our website uses cookies. We will ask you to consent to our use of cookies in accordance with the terms of this policy when you first visit our website. By using our website and agreeing to this policy, you consent to our use of cookies in accordance with the terms of this policy.

WHAT INFORMATION DO WE COLLECT

We may collect, store and use the following kinds of personal information:

- i. information about your computer and about your visits to and use of this website and /or our platforms, including your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views, website navigation and;
- ii. information relating to any transactions carried out between you and us on or in relation to this website and /or our platforms;
- iii. information that you provide to us for the purpose of registering and opening an account with us;
- iv. information that you provide to us for the purpose of subscribing to our website services, email notifications and/or newsletters; and
- v. any other information that you choose to send to us.

Before you disclose to us the personal information of another person, you must obtain that person's consent to both the disclosure and the processing of that personal information in accordance with the terms of this privacy policy.

COOKIES

Our website uses cookies. We will ask you to consent to our use of cookies in accordance with the terms of this policy when you

first visit our website. By using our website and agreeing to this policy, you consent to our use of cookies in accordance with the terms of this policy.

A cookie is a small file of letters and numbers downloaded on to a device when the user accesses certain websites. A cookie will allow a website to recognise a user's device.

A cookie will contain the name of internet location (the domain) from which the cookie has come and the lifetime of the cookie (a cookie will usually expire after a certain period of time).

Two types of cookies are used on this website:

- i. Session cookies which are temporary cookies that remain in the cookie file of your browser until you leave the site; and
- ii. Persistent cookies which remain in the cookie file of your browser for much longer (though how long will depend on the lifetime of the specific cookie).

How we use cookies on our site and what information we collect

SESSION COOKIES

We use session cookies to allow you to carry information across pages of our site and avoid having to re-enter information.

PERSISTENT COOKIES

We use persistent cookies:

- i. from time to time to help us recognise you as a unique visitor when you return to our website and to monitor your use of our website;
- ii. to allow us to link you to any of our Partners or Affiliates should you come to our website through a banner on a website of an Affiliate or Partner.

USING YOUR PERSONAL INFORMATION

Personal information submitted to us via this website and /or platforms will be used for the purposes specified in this privacy policy or in relevant parts of the website.

We may use your personal information to:

- i. administer the website;

CFH CLEARING LIMITED

Fourth Floor, 8 Lloyd's Avenue · London · EC3N 3EL · United Kingdom

Phone: +44 (0) 203 455 8751 · Email: legal@cfhclearing.com · Web: www.cfhclearing.com

Registered in England and Wales, No. 6557752
Authorised and regulated by the Financial Conduct Authority, FRN. 481853



PRIVACY POLICY – CFH CLEARING

- ii. improve your browsing experience by personalising the website;
- iii. enable your use of the services available on the website;
- iv. send statements and invoices to you, and collect payments from you;
- v. send you general commercial communications;
- vi. send you email notifications which you have specifically requested;
- vii. send you our newsletter and other marketing communications relating to our business which we think may be of interest to you, by post or, where you have specifically agreed to this, by email or similar technology and you can inform us at any time if you no longer require marketing communications;
- viii. deal with enquiries and complaints made by or about you relating to the website;
- ix. keep the website secure and prevent fraud;
- x. verify compliance with the terms and conditions governing the use of the website including monitoring private messages sent through our website private messaging service; and
- xi. where you submit personal information for publication on our website, we will publish and otherwise use that information in accordance with the licence you grant to us.

We will not, without your express consent, provide your personal information to any third parties for the purpose of direct marketing.

DISCLOSURES

We may disclose your personal information to any of our employees, officers, agents or suppliers insofar as reasonably necessary for the purposes set out in this privacy policy.

We may disclose your personal information to any member of our group of companies. This means our subsidiaries, our ultimate holding company and all its subsidiaries, insofar as reasonably necessary for the purposes set out in this privacy policy.

In addition, we may disclose your personal information:

- i. to the extent that we are required to do so by law;
- ii. in connection with any on-going or prospective legal proceedings;
- iii. in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk);
- iv. to the purchaser (or prospective purchaser) of any business or asset that we are (or are contemplating) selling; and
- v. to any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.

Except as provided in this privacy policy, we will not provide your information to third parties.

INFORMATION STORAGE AND DATA TRANSFER

Information that we collect may be stored and processed in and transferred between any of the countries in which we operate in order to enable us to use the information in accordance with this privacy policy.

Information which you provide may be transferred to countries including the United States, which do not have data protection laws equivalent to those in force in the European Economic Area.

Should you have any questions or complaints about your privacy please contact us. If a complaint is not resolved by CFH Clearing to your satisfaction, you may complain to the Information Commissioner.

Under the UK data protection legislation, you have (subject to certain exceptions) the right to obtain copies of any personal information which CFH Clearing holds about you and to inform CFH Clearing of any inaccuracy.

By accessing this website or other service we provide to you, you consent to CFH Clearing collecting, maintaining, using and disclosing personal information about you and provided by you as described above.

CFH CLEARING LIMITED
Fourth Floor, 8 Lloyd's Avenue · London · EC3N 3EL · United Kingdom
Phone: +44 (0) 203 455 8751 · **Email:** legal@cfhclearing.com · **Web:** www.cfhclearing.com

*Registered in England and Wales, No. 6557752
Authorised and regulated by the Financial Conduct Authority, FRN. 481853*



PRIVACY POLICY – CFH CLEARING

You may inform CFH Clearing at any time that your personal details have changed or that you wish CFH Clearing to delete personal information we hold about you by emailing us at compliance@cfhclearing.com. CFH Clearing will change or delete your personal information in accordance with your instructions.

In addition, personal information that you submit for publication on the website will be published on the internet and may be available, via the internet, around the world. We cannot prevent the use or misuse of such information by others.

You expressly agree to such processing of personal information.

SECURITY OF YOUR PERSONAL INFORMATION

We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.

We will store all the personal information you provide on our secure password and firewall protected servers.

All electronic transactions entered into via the website and /or our platforms will be protected by encryption technology.

You acknowledge that the transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

You are responsible for keeping your password and other login details confidential. We will not ask you for your password except when you log in to the website and/or out platforms

POLICY AMENDMENTS

We may update this privacy policy from time to time by posting a new version on our website. You should check this page occasionally to ensure you are happy with any changes.

We may also notify you of changes to our privacy policy by email.

YOUR RIGHTS

You may instruct us to provide you with any personal information we hold about you. Provision of such information will be subject to:

- i. the payment of a fee (currently fixed at **GBP 10**); and
- ii. the supply of appropriate evidence of your identity.

We may withhold such personal information to the extent permitted by law.

You may instruct us not to process your personal information for marketing purposes, by sending an email to us. In practice, you will usually either expressly agree in advance to our use of your personal information for marketing purposes, or we will provide you with an opportunity to opt out of the use of your personal information for marketing purposes.

THIRD PARTY WEBSITES

The website contains links to other websites. We are not responsible for the privacy policies or practices of third party websites.

UPDATING INFORMATION

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

CONTACT

If you have any questions about this privacy policy or our treatment of your personal information, please write to us by email to compliance@cfhclearing.com or by post to:

The Compliance Officer

CFH Clearing Limited
Fourth Floor
8 Lloyd's Avenue
London
EC3N 3EL
United Kingdom

DATA CONTROLLER

The data controller responsible in respect of the information collected on this website is **CFH Clearing Limited**.

Our data protection registration number is **Z1398734**. This can be viewed here.

www.ico.org.uk/what_we_cover/register_of_data_controllers

CFH CLEARING LIMITED
Fourth Floor, 8 Lloyd's Avenue · London · EC3N 3EL · United Kingdom
Phone: +44 (0) 203 455 8751 · **Email:** legal@cfhclearing.com · **Web:** www.cfhclearing.com

*Registered in England and Wales, No. 6557752
Authorised and regulated by the Financial Conduct Authority, FRN. 481853*