

Capital Financial Markets GDPR notice

General Data Protection Regulation (GDPR) This regulatory notice is solely for your information. You do not need to take any action in relation to it.

Background

GDPR is a new law coming into force on 25 May 2018 which addresses what organisations can and cannot do with your personal data. 'Personal data' is information that identifies individuals directly or from which individuals can be identified indirectly. Capital Financial Markets ("the firm") are the 'data controller' in relation to your personal data that we hold, because we control the storage and use of that personal data.

Purpose

One of the requirements of GDPR is that we provide you with details about how we process your personal data. 'Processing' includes obtaining, recording or storing personal data and carrying out any tasks using the personal data. This notice also describes your data protection rights, including a right to object to some of the processing which we carry out.

Your rights

Under the GDPR you have the following rights:

- To obtain access to, and copies of, the personal data that we hold about you;
- To require that we cease processing your personal data if the processing is causing you damage or distress; and
- To require us not to send you marketing communications.
- To require us to erase your personal data;
- To require us to restrict our data processing activities;
- To receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller; and
- To require us to correct the personal data we hold about you if it is incorrect.
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Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply.

If you have any questions about how we use your personal data, or you wish to exercise any of the rights set out above, please contact our Compliance Officer using the following:

Data Processing

We process your personal data for a number of different purposes such as managing your assets, understanding your aims and objectives, reporting to you on the services we provide, for verifying your identity and carrying out regulatory checks, in order to compile regulatory returns, for complying with various laws and regulations to which we are subject, to keep in contact with you and to invite you to events or meetings which may be of interest to you and for obtaining information in relation to your use of our website.

Lawful grounds

There are a number of reasons why we process your personal data. Our primary objective for doing so is that it enables the firm to manage your assets. The lawful grounds for the firm to process your data is that it is necessary for the performance of our contract with you, it is necessary for compliance with a legal obligation and it is necessary for the purpose of our legitimate interests.

Our specific legitimate interests served by the processing also include ensuring our services are compliant with our regulatory obligations and to ensure that we provide the best possible client service including the administration of your portfolio.

The lawful grounds relating to the provision of reporting to you are that it is necessary for the performance of our contract with you and is necessary in order to comply with our contract with you and is necessary to satisfy a legal obligation and it is necessary for the purpose of our legitimate interests. Our specific legitimate interests served by the processing include ensuring our services are provided in a regulatory compliant manner and ensure that we provide the best possible client service.

Verifying your identity and carrying out regulatory checks. The lawful grounds for processing are that it is necessary for compliance with a legal obligation and it is necessary for the purpose of our legitimate interests. Our specific legitimate interests served by the processing include the prevention of fraud and other financial crime and for ensuring that our services comply with the relevant regulatory requirements.

Regulatory reporting. The lawful grounds for processing are that it is necessary for the performance of our contract with you and enables us to comply with our regulatory obligations and it is necessary for the purpose of our legitimate interests. We have a legitimate interest in ensuring our services are delivered in a regulatory compliant manner.

Adherence to regulatory requirements. The lawful grounds for processing are that it is necessary for the performance of our contract with you and for compliance with a legal obligation and regulatory requirements and therefore it is necessary for the purpose of our legitimate interests. We have a legitimate interest in ensuring our services are delivered in a regulatory compliant manner.

Understanding your aims and objectives. The lawful grounds for processing are that it is necessary for the performance of our contract with you and therefore it is necessary for the purpose of our legitimate interests. Our specific legitimate interests served by the processing include ensuring that your investments are suitable for your needs, you are provided with the best possible client service.

Inviting you to meetings and other events which we think may be of interest to you. The lawful ground for processing is that it is necessary for the purpose of our legitimate interests. Our specific legitimate interests served by the processing include ensuring that you receive the best possible client service from us.

Obtaining information in relation to your use of our website The lawful ground for processing is that it is necessary for the purpose of our legitimate interests. Our specific legitimate interests served by the processing include understanding how our website is used in order that we can improve it's content and for enhancing ensuring our network and information security.

Providing and withdrawing consent

We may use and process your personal information where you have consented for us to do so in connection with our marketing activities.

You may withdraw your consent for us to use your information in this way at any time. To do so please contact our Compliance Officer at 0203 697 0560 / admin@capitalfinancialmarkets.co.uk

Sharing of Personal data

The firm may pass your personal data to third parties on whose services we rely in order to be able to provide services to you. These include: custodians, market counterparties, brokers, banks, fund operators, administrators, software providers, professional advisers, lawyers, auditors, registrars, regulatory or tax authorities.

Transfer of information outside of the EU

Third parties whose services we use may also transfer your personal data to other third parties who in turn they use to provide their services to us. We ask such third parties to put in place appropriate safeguards where this involves a transfer of personal data outside the EU.

Data retention periods

We will retain your personal data for the duration of our contractual relationship and, as required by our regulators, for a period of time thereafter.

Automated decision making

The firm does not use automated decision making applications.

Right to complain

If you wish to make a complaint in relation to the use of your personal data, please contact our Compliance Officer at 0203 697 0560 / admin@capitalfinancialmarkets.co.uk

You have a right to lodge a complaint in relation to our processing of your personal data with the Information Commissioner's Office. The helpline number is 0303 123 1113.

If you require any further information in relation to this Privacy Notice, please contact our Compliance Officer at 0203 697056 / admin@capitalfinancialmarkets.co.uk

We may update this notice from time to time to reflect changes in the way we process your personal data or to clarify information we have provided in