

## Privacy Notice

### **Your personal Information**

The personal information which you provide to Vantage Capital Markets LLP (**VCM or the Partnership**) may be used for a number of different purposes:

- to administer the product or service for which you apply;
- to comply with legal and regulatory requirements;
- to identify you when you contact VCM; or
- for internal analysis and research.

This data will only be used in accordance with your preferences.

### **Third Parties**

VCM may use external third parties to process your personal information on its behalf in accordance with these purposes. VCM may share your personal information with the following third parties:

- Associated or affiliated VCM entities for the purposes set out in this Privacy Notice;
- Other organisations for any of the following purposes:
  1. compliance with any legal or regulatory requirements;
  2. to protect VCM and its customers from theft and fraud;
  3. to take appropriate steps if VCM considers your levels of trading to be short-term, excessive or disruptive.

### **How we will use information about you**

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to comply with Money Laundering regulations and conduct checks for onboarding purposes.
2. For purposes relating to the trading of instruments over our Organised Trading Facility (OTF).
3. Where we need to comply with a legal obligation.
4. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests).
2. Where it is needed in the public interest or for official purposes.

### **How long will you use my information for?**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

### **Your duty to inform us of changes**

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

### **No fee usually required**

With limited exceptions, you may ask for a copy of the personal information which VCM holds on you. The Partnership is allowed by law to make a charge for this. If any of the information which we hold about you is incorrect, please tell us and we will amend it. You can email us at [vcm@vcmlp.com](mailto:vcm@vcmlp.com)

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

### **Security**

Except as outlined above or otherwise required by law, your personal information will not be passed to anyone without your permission.

Please note that the personal information which you provide will be processed by VCM or associated or affiliated companies, who may be based outside of the EEA. This may involve the transfer of data by electronic media including the internet. Where your data is transferred outside of the UK, VCM will ensure that the recipient agrees to keep your information confidential and hold it securely in accordance with the requirements of the Data Protection Act.

E-mail addresses and fax numbers are not collected or used without your specific permission to do so.

### **Changes to this Privacy Notice**

We reserve the right to update this Privacy Notice at any time, and we will provide you with a new Privacy Notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.