

PRIVACY POLICY

We are committed to protecting your privacy. Before you give us any of your details, please read the following information carefully.

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Personal data means information about you from which we can identify you (either on its own, or by piecing it together with other information) (**Personal Data**).

For the purpose of the Data Protection Act 1998 (the **Act**), the data controller is ED&F Man Capital Markets Limited, 3 London Bridge Street, London, England, SE1 9SG.

1. Information we collect from you

We may collect and process the following data about you:

- Information that you provide to us in filling out our account opening forms;
- Information that you provide to us if there are any issues with the account or the services;
- Details of transactions you carry out using our services;
- Details of your visits to our website.

2. How we use your Personal Data

We will hold and process any Personal Data you provide to us for the following purposes:

- 'service administration purposes', so we can contact you for a number of purposes related to the service you have signed up for. For example, we may wish to provide you with password reminders or notify you that the particular service has been suspended for maintenance;
- to carry out our obligations arising from any transactions entered into between you and us;
- to comply with applicable law, for example, in response to a request from a court or regulatory body, where such request is made in accordance with the law; and
- to notify you about changes to our service.

We will not contact you for marketing purposes, unless you specifically agree to be contacted for such purposes at the time you submit your information to us, or at a later time if you sign up specifically to receive this information.

We do not sell Personal Data to third parties.

PRIVACY POLICY

When you supply any Personal Data to us we have legal obligations towards you in the way we use this data. We must collect the information fairly, that is, we must explain how we will use it and tell you if we want to pass the information on to anyone else. In all circumstances the Personal Data we hold about you will be adequate, relevant and not excessive. Details of your legal rights in relation to your Personal Data can be found on the Information Commissioner's website www.ico.org.uk.

You agree that we may collect, store, and use information about you in accordance with this privacy policy.

3. Disclosure of your Personal Data

There are circumstances where we wish to disclose or are compelled to disclose your Personal Data to third parties. This will only take place in accordance with applicable law and for the purposes listed above. These scenarios include disclosure:

- within our organisation (this may include our employees, agents, contractors and subcontractors);
- in the event that we sell or buy any business or assets, in which case we may disclose your Personal Data to the prospective seller or buyer of such business or assets;
- if we are under a duty to disclose or share your Personal Data in order to comply with any legal obligation, or to protect our rights or property. This includes exchanging information with other companies and organisations for the purposes of fraud prevention and credit risk reduction;
- to our outsourced service providers or suppliers to facilitate the provision of our services, for example, the disclosure to our data centre provider for the safe keeping of your Personal Data;
- to third party service providers and consultants in order to protect the security or integrity of our business, including our databases and systems and for business continuity reasons;
- to public authorities where we are required by law to do so; and
- to any other third party where you have provided your consent.

Please note that by sending your Personal Data to us you are explicitly consenting to the processing and transfer of information in this way.

PRIVACY POLICY

4. Retention of Personal Data

We will hold your Personal Data on our systems for as long as we are required to do so to comply with our legal and regulatory obligations; after which point, it will be destroyed.

5. Where we store your Personal Data

We will make sure that all Personal Data supplied by you is held securely, in accordance with the Data Protection Act 1998.

Once we have received your Personal Data, we will use strict procedures and security features to try to prevent unauthorised access.

Given the global nature of our business, we may need to transmit your information to other members of our group, which may involve the cross-border transfer of your information. We have taken the steps outlined in this notice to improve the security of your information, but please note that by sending your Personal Data to us you explicitly consent to the cross-border transfer of your information.

6. IP addresses and cookies

We may collect information about your visits to our website. We collect information on your IP address and the page browser access. This is used within our group to improve the design and layout of our sites. We gather information on:

- the relative popularity of each page;
- the average number of pages accessed by visitors;
- the number of emails sent or files downloaded; and
- the average time spent on the site.

None of this information is linked back to you as an individual.

In collecting information about visits to our website, we may use 'cookies' to identify visitors and to build up a demographic profile. A cookie is a small piece of text that attaches to your hard drive (but does not access your hard drive) which can then store and sometimes track information on how you use a website. It can help us improve the design and layout of our website, provide you with a better online user experience and help us analyse the profile of our visitors. Most browsers will automatically accept a cookie, but it is possible to set your browser to notify you before it is sent, at which point you can accept or reject it. Setting your computer to reject cookies means that certain personalised services cannot then be provided to you and accordingly you may not be able to take full advantage of all of our features. Each browser is different, so check the 'help' menu of your browser to learn how to change your cookie preferences.

If you are located in the European Economic Area and use our Website, when you arrive on our website a pop-up message will appear asking for your consent to place

PRIVACY POLICY

advertising cookies on your device. In order to provide your consent, please click “I understand”. Once your consent has been provided, this message will not appear again when you revisit. If you, or another user of your device, wish to withdraw your consent at any time, you can do so by altering your browser settings otherwise we will assume that you are happy to receive cookies from our website. For more information please visit www.allaboutcookies.org and <http://www.youronlinechoices.com/uk/>.

7. Third party websites

We may provide hyperlinks from our website to third-parties' websites. This privacy policy applies only to our website's contents and not to those websites to which we provide a link.

8. Your rights

We are willing, on written request from you, to provide details of any Personal Data that you have provided us with (this may be at a small charge) and/or to stop using your Personal Data for the purposes described above. We may ask for proof of identity from you before disclosing this information. This is to safeguard the security of your information.

If any information you have provided us with becomes inaccurate or out of date, or if you have any queries about this privacy policy, please contact us.

9. Changes to our privacy policy

If we change our privacy policy, we will post the changes on our website so that you may be aware of the information we collect and how we use it at all times. Continued use of our website and / or our services will signify that you agree to any such changes.

10. Contact

If you have any questions, comments and requests regarding this privacy policy please contact compliance@edfmancapital.com