



Privacy Policy

Pepperstone Limited

Company:	Pepperstone Limited
Company Number:	08965105
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SECTION A – INTRODUCTION

1. INTRODUCTION

- 1.1 The information in this document details how we, Pepperstone Limited (“Pepperstone”), comply with the requirements of the Data Protection Act 1998 (“Data Protection Act”) and the Information Commissioner’s Office (“ICO”) in protecting your personal data.
- 1.2 Personal data is any information or opinion about you that is capable, or reasonably capable, of identifying you, whether the information or opinion is true or not and is recorded in material form or not.
- 1.3 Sensitive data includes such things as your racial or ethnic origin, political opinions or membership of political associations, religious or philosophical beliefs, membership of a professional or trade association or trade union, sexual orientation or criminal record, that is also personal data. Your health, genetic and biometric information and biometric templates are also sensitive data.
- 1.4 We will act to protect your personal data and sensitive data in accordance with the Data Protection Act.
- 1.5 We collect personal and/or sensitive data to provide you with the products and services you request as well as information on other products and services offered by or through us.
- 1.6 Your personal and/or sensitive data may be used by us to administer our products and services, for prudential and risk management purposes and, unless you tell us otherwise, to provide you with related marketing information. We also use the information we hold to help detect and prevent illegal activity. We cooperate with police and other enforcement bodies as required or allowed by law.
- 1.7 We disclose relevant personal data to external organisations that help us provide services. These organisations are bound by confidentiality arrangements. They may include overseas organisations.
- 1.8 You can seek access to the personal data we hold about you. If the information we hold about you is inaccurate, incomplete, or outdated, please inform us so that we can correct it. If we deny access to your personal data, we will let you know why. For example, we may give an explanation of a commercially sensitive decision, or give you access to the information through a mutually agreed intermediary, rather than direct access to evaluative information connected with it.



SECTION B – COLLECTION OF PERSONAL DATA

2. Why we collect data

- 2.1 We collect personal data when it is reasonably necessary for one or more of our functions or activities.
- 2.2 These include:
 - (a) administering our client relationships;
 - (b) providing clients with the products and services they request and, unless they tell us otherwise, to provide information on products and services offered by us and external product and service providers for whom we act as agent. (If you have provided us with your email or mobile phone details, we may provide information to you electronically with respect to those products and services);
 - (c) complying with our legal obligations;
 - (d) monitoring, evaluating and customising products and services and improving client experience;
 - (e) assisting clients with queries; and
 - (f) taking measures to detect and prevent fraudulent crime or any other activity which may cause harm to Pepperstone’s business interests, products or services;

3. Data we may collect

- 3.1 The personal data we collect generally includes:
 - (a) name;
 - (b) date of birth;
 - (c) postal or email address; or
 - (d) phone numbers, including home, mobile and work;
 - (e) fax number;
 - (f) information relating to an individual’s source of wealth;
 - (g) occupation;
 - (h) credit card details;



- (i) bank account details, including institution name, branch, account name, bank identifier, and account number or IBAN;
 - (j) information relating to an individual's trading experience;
 - (k) identification documentation, as required under anti-money laundering legislation, including:
 - (i) passport;
 - (ii) driver's licence;
 - (iii) national identity card (if applicable);
 - (iv) utility bills;
 - (v) trust deed;
 - (l) a credit check on the individual; or
 - (m) other information we consider necessary to our functions and activities.
- 3.2 We are required by law to identify you if you are opening a new account or adding a new signatory to an existing account. Anti-money laundering laws require us to sight and record details of certain documents (i.e. photographic and non-photographic documents) in order to meet the standards set under those laws.
- 3.3 Where it is necessary to do so, we also collect data regarding the following individuals:
- (a) trustees;
 - (b) partners;
 - (c) company directors and officers;
 - (d) officers of co-operatives and associations;
 - (e) client agents; and
 - (f) individuals dealing with us on a "one-off" basis.
- 3.4 We may take steps to verify the data we collect. For example, a birth certificate provided as identification may be verified with records held by the General Register Office to protect against impersonation, or we may verify with an employer that employment and remuneration information provided in an application for credit is accurate.



4. How we collect the data

- 4.1 We only collect personal data about you directly from you unless it is unreasonable or impracticable to do so.
- 4.2 We may also collect data from you electronically, for instance, when you visit our website.

5. Data collected from someone else

- 5.1 If it is impracticable or unreasonable for us to collect the personal data directly from you, we may collect such data from agents, or from your family members or friends.
- 5.2 We may collect personal data about you from other people, for instance Pepperstone affiliates or divisions.

6. Incomplete or inaccurate data

- 6.1 We may not be able to provide you with the products or services you are seeking if you provide incomplete or inaccurate data to us.

7. Sensitive data

- 7.1 The Data Protection Act also protects your sensitive data, if we need to obtain this type of information to provide you with our services, we will ask for your consent, unless collection is otherwise permitted by law.

8. Anonymity and pseudonymity

- 8.1 You have the option of not identifying yourself, or of using a pseudonym, when dealing with us in relation to a particular matter. However, we can only provide you with this option when it is not impracticable for us to do so and when no law requires identification.



9. Dealing with unsolicited personal data

- 9.1 If we receive personal data that is not solicited by us, we will only retain it, if we determine that:
- (a) it is reasonably necessary for one or more of our functions or activities; and
 - (b) you have consented to the data being collected, or given the absence of your consent that it was impracticable or unreasonable for us to obtain it under the circumstances.
- 9.2 If these conditions are not met, we will destroy or de-identify the data.
- 9.3 If such unsolicited data is sensitive data we will obtain your consent to retain it regardless of what the circumstances are.

SECTION C – INTEGRITY OF YOUR PERSONAL DATA

10. Quality of personal data

- 10.1 We ensure that the personal data we collect and use or disclose is accurate, up to date, complete and relevant.
- 10.2 Please contact us if any of the details you have provided to us change or if you believe that the data we have about you is not accurate or up to date.
- 10.3 We may also take steps to update personal data we hold, for example, an address, by collecting personal data from publicly available sources such as telephone directories or electoral rolls.

11. Security of personal data

- 11.1 We are committed to ensure that we protect any personal data we hold from misuse, interference, loss, unauthorised access, modification and disclosure.
- 11.2 For this purpose we have a range of practices and policies in place to provide a robust security environment. We ensure the on-going adequacy of these measures by regularly reviewing them.
- 11.3 Our security measures include, but are not limited to:
- (a) educating our employees as to their obligations with regard to your personal data;
 - (b) requiring our employees to use passwords and/or smartcards when accessing our systems;
 - (c) encrypting data sent from your computer to our systems during internet transactions and client access codes transmitted across networks;



- (d) employing firewalls, intrusion detection systems and virus scanning tools to protect against unauthorised persons and viruses from entering our systems;
 - (e) using dedicated secure networks or encryption when we transmit electronic data for purposes of outsourcing;
 - (f) practising a clean desk policy in all premises occupied by us and our related bodies corporate and providing secure storage for physical records; and
 - (g) employing physical and electronic means such as alarms, cameras and guards (as required) to protect against unauthorised access to buildings.
- 11.4 Where data we hold is identified as no longer needed for any purpose we ensure it is effectively and securely destroyed, for example, by shredding or pulping in the case of paper records or by degaussing (demagnetism of the medium using alternating electric currents) and other means in the case of electronic records and equipment.

SECTION D – USE OR DISCLOSURE OF PERSONAL DATA

12. Use or Disclosure

- 12.1 If we hold personal data about you that was collected for a particular purpose (“the primary purpose”), we will not use or disclose the information for another purpose (“the secondary purpose”) unless:
- (a) we have obtained your consent to use or disclose the data; or
 - (b) you would reasonably expect us to use or disclose the data for the secondary purpose and the secondary purpose is:
 - (i) if the data is sensitive – directly related to the primary purpose; or
 - (ii) if the data is not sensitive – related to the primary purpose;
 - (c) the use or disclosure of the data is required or authorised by or under UK law or a court/tribunal order; or
 - (d) we reasonably believe that the use or disclosure of the data is reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body.

13. Who we may disclose personal data to

- 13.1 Depending on the product or service you have, the entities we exchange your information with include but are not limited to:
- (a) our related bodies corporate, including our Australian-based parent company Pepperstone Group Limited;
 - (b) brokers and agents who refer your business to us;
 - (c) affiliated product and service providers and external product and service providers for whom we act as agent (so that they may provide you with the product or service you seek or in which you have expressed an interest);
 - (d) auditors we appoint to ensure the integrity of our operations;
 - (e) any person acting on your behalf, including your financial adviser, solicitor, settlement agent, accountant, executor, administrator, trustee, guardian or attorney;
 - (f) your referee (to confirm details about you);
 - (g) if required or authorised to do so, regulatory bodies and government agencies;
 - (h) credit reporting agencies;
 - (i) other financial institutions and organisations at their request if you seek credit from them (so that they may assess whether to offer you credit); and
 - (j) other organisations who in conjunction with us provide products and services (so that they may provide their products and services to you).
- 13.2 Our use or disclosure of personal data may not be limited to the examples above.

14. Outsourcing

- 14.1 We disclose personal data when we outsource certain functions, including bulk mailing, card and cheque book production, market research, direct marketing, statement production, debt recovery and information technology support. We also seek expert help from time to time to help us improve our systems, products and services.
- 14.2 We use banking agents, for example, local businesses, to help provide you with face-to-face banking services. These agents collect personal data on our behalf.
- 14.3 In all circumstances where personal data may become known to our contractors, agents and outsourced service providers, there are confidentiality arrangements in place. Contractors, agents and outsourced service providers are not able to use or disclose personal data for any purposes other than our own.

- 14.4 We take our obligations to protect client data very seriously. We make every effort to deal only with parties who share and demonstrate the same attitude.

15. Disclosure required by law

- 15.1 We may be required to disclose customer information by law e.g. under Court Orders or Statutory Notices pursuant to taxation or social security laws or under laws relating to sanctions, anti-money laundering or counter terrorism financing.

SECTION E – DIRECT MARKETING

16. Direct marketing

- 16.1 We will only use or disclose the personal data we hold about you for the purpose of direct marketing if we have received the information from you and you have not opted-out of receiving such communications.
- 16.2 Direct marketing means that we use your personal data to provide you with information on our products and services that may interest you.
- 16.3 If you wish to opt-out of receiving marketing information altogether, you can:
- (a) unsubscribe from email communication by clicking the relevant footer link; or
 - (b) write to us by:
 - (i) email at support@pepperstone.com; or
 - (ii) post at 68 Hanbury Street, London E1 5JL.

SECTION F – CROSS-BORDER DISCLOSURE OF PERSONAL DATA

- 16.4 We will only disclose your personal data to a recipient who is not in the United Kingdom and who is not our entity after we ensure that:
- (a) the overseas recipient does not breach the Data Protection Act; or
 - (b) you will be able to access to take action to enforce the protection of a law or binding scheme that has the effect of protecting the data in a way that is at least substantially similar to the way in which the Data Protection Act protects the data; or

- (c) you have consented to the disclosure after we expressly advise you that there is no guarantee that the overseas recipient will not breach the Data Protection Act; or
- (d) the disclosure of the information is required or authorised by or under a UK law or a court/tribunal order.

SECTION G – ADOPTION, USE OR DISCLOSURE OF GOVERNMENT IDENTIFIERS

17. Adoption of government related identifiers

- 17.1 We will not adopt a government related identifier of an individual as our own identifier unless required or authorised to do so by or under UK law, regulation or court/tribunal order.

18. Use or disclosure of government related identifiers

- 18.1 Before using or disclosing a government related identifier of an individual, we will ensure that such use or disclosure is:
 - (a) reasonably necessary for us to verify your identity for the purposes of the our activities or functions; or
 - (b) reasonably necessary for us to fulfil its obligations to a government agency or authority; or
 - (c) required or authorised by or under a UK law, regulation or a court/tribunal order; or
 - (d) reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body.

SECTION H – ACCESS TO AND CORRECTION OF PERSONAL DATA

19. Access

- 19.1 You can request us to provide you with access to the personal data we hold about you.
- 19.2 Requests for access to limited amounts of personal data, such as checking to see what address or telephone number we have recorded, can generally be handled over the telephone.
- 19.3 If you would like to request access to more substantial amounts of personal data such as details of what is recorded in your account file, we will require you to complete and sign the "Request for Access to Personal data" form that may be downloaded on our website and email it to us.

- 19.4 Following receipt of your request, we will provide you with an estimate of the access charge and confirm that you want to proceed.
- 19.5 We will not charge you for making the request for access, however access charges may apply to cover our costs in locating, collating and explaining the information you request.
- 19.6 We will respond to your request as soon as possible and in the manner requested by you. We will endeavour to comply with your request within 14 days of its receipt but, if that deadline cannot be met owing to exceptional circumstances, your request will be dealt with within 30 days. It will help us provide access if you can tell us what you are looking for.
- 19.7 Your identity will be confirmed before access is provided.

20. Exceptions

- 20.1 In particular circumstances we are permitted by law to deny your request for access, or limit the access we provide. We will let you know why your request is denied or limited if this is the case. For example, we may give an explanation of a commercially sensitive decision rather than direct access to evaluative information connected with it.

21. Refusal to give access and other means of access

- 21.1 If we refuse to give access to your personal data or to give access in the manner requested by you, we will give you a written notice setting out the reasons for the refusal, the mechanisms available to complain and any other relevant matter.
- 21.2 Additionally, we will endeavour to give access in a way that meets both yours and our needs.

22. Access to a credit report about you

- 22.1 You have the right to ask for a copy of any credit report we have obtained about you from a credit-reporting agency. However, as we may not have retained a copy after we have used it. The best means of obtaining an up-to-date copy is to get in touch with the credit-reporting agency direct.
- 22.2 You have a right to have any inaccuracies corrected or, if there is any dispute as to accuracy, to have a note added to your credit reporting agency file explaining your position.
- 22.3 If we decline your credit application wholly or partly because of adverse information on your credit report, we are required to tell you of that fact and how you can go about getting a



SECTION I – CORRECTION OF PERSONAL DATA

23. Correction

- 23.1 We will correct all personal data that we believe to be inaccurate, out of date, incomplete, irrelevant or misleading given the purpose for which that data is held or if you request us to correct the data.

24. Refusal to correct data

- 24.1 If we refuse to correct the personal data as requested by you, we will give you a written notice setting out the reasons for the refusal, the mechanisms available to complain and any other relevant matter.

25. Request to associate a statement

- 25.1 If we refuse to correct the personal data as requested by you, you can request us to associate with the data a statement that the data is inaccurate, out of date, incomplete, irrelevant or misleading. We will then associate the statement in such a way that will make the statement apparent to users of the data.

SECTION J – CONTACTING US AND COMPLAINTS

26. Contact

- 26.1 If you have any questions or would like further information about our privacy and information handling practices, please contact us by:
- (a) email: support@pepperstone.com; or
 - (b) post: 68 Hanbury Street, London E1 5JL.



27. Making a privacy complaint

- 27.1 We offer a free internal complaint resolution scheme to all of our clients. Should you have a privacy complaint, please contact us to discuss your concerns.
- 27.2 To assist us in helping you, we ask you to follow a simple three-step process:
- (a) Gather all supporting documents relating to the complaint.
 - (b) Contact us and we will review your situation and if possible resolve your complaint immediately.
 - (c) If the matter is not resolved to your satisfaction, please contact our Customer Service Team on support@pepperstone.com
- 27.3 If you are still not satisfied, you may complain to the ICO about the way we handle your personal data. The ICO can be contacted by phone at +44 1625 545 745. Information is also available on the ICO's website at ico.org.uk.
- 27.4 Pepperstone Limited is registered with the ICO under registration reference: CSN7070477.



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