



ITI CAPITAL

# PRIVACY POLICY

## INTRODUCTION

ITI Capital Limited ("ITI Capital") is a part of ITI Group Ltd which includes ITI Trade Limited and Investment Company IT Invest JSC. ITI Capital operates as an Investment Firm, authorised and regulated by the Financial Conduct Authority ("FCA") in the United Kingdom, and functions as a multi-asset brokerage.

Following the implementation of the General Data Protection Regulation ("GDPR") which is designed to enable individuals to better control their personal data, ITI Capital has taken steps to ensure it is compliant with its regulatory obligations under GDPR and ensures that personal data shall be:

- processed lawfully, fairly and in a transparent manner in relation to individuals;
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- adequate, relevant and limited to what is necessary;
- accurate and at all times kept up to date;
- shall be kept for no longer than is necessary for the purposes for which it is collected; and
- adequately securitised and protected against loss, unauthorised access or processing, and destruction or damage.

The purpose of this Privacy Policy ("Policy") is to explain how personal data is processed, for what purposes this will be done and what rights you have in relation to the personal data that will be collected and used.

Any reference to "us", "we" or "our" is in reference to ITI Capital unless otherwise stated.

Any reference to "you", "your" or "yourself" is in reference to any of our clients or prospective clients unless otherwise stated.

Please note that this Policy will be kept under regular review to ensure it remains appropriate to the changing environment.

## WHAT INFORMATION DO WE COLLECT ABOUT YOU

We collect information about you when you provide us with details to conduct Know Your Client (“KYC”) checks and create an account with us or place an order for products or services. The type of information we collect and why is listed below:

Additionally, we will be keeping records of your trading activity such as the products you trade and their performance in addition to any historical data. This will be used for the on-going monitoring of the account and to create client profiles so that any unusual or suspicious activity is automatically detected and reviewed.

Personal data type	Purpose
Personal information such as gender, name, date of birth and address.	To meet our anti money laundering (“AML”) and other regulatory obligations in relation to KYC and client due diligence. To verify your identity using our verification processes.
Contact information (email address and phone number).	In order to send you correspondence in relation to the services provided and to fulfil our regulatory and compliance obligations.
Employment information, financial information, relevant education and trading experience.	In order to comply with KYC obligations and in order to meet our regulatory obligations relating to assessing the appropriateness of our products and services.
Ethnicity, citizenship and social security numbers or national identity and passport numbers.	In order to comply with KYC and regulatory trade reporting and other AML obligations.
Proof of photo ID and address verification.	In order to comply with KYC and regulatory trade reporting and other AML obligations.
Unique device number (IP address) and device information including version of web browser you use.	When you visit our website, navigate through the pages or fill in any forms, we may collect your unique device number or IP address in order to set up your profile.
Financial sanctions.	In order to perform our electronic AML screening checks and to comply with other fraud detection policies. This may generate further information on your credit history, criminal convictions or political interests leading to us making decisions based on the results of these checks.
I.P. address and cookies.	To enhance the client experience.

## LAWFUL BASIS FOR PROCESSING

The lawful basis for processing the data mentioned above is as follows:

- processing is necessary for the performance of a contract with you or to take steps to enter into a contract to conduct regulated activities;
- processing is necessary for compliance with a legal obligation; and
- necessary for the purposes of our legitimate business interests (such as keeping you posted on our latest product and service announcements, industry newsletters and publications).

## HOW INFORMATION ABOUT YOU WILL BE USED

Personal information which you provide to ITI Capital will be used to assess your level of risk, review whether or not the requested account is suitable and appropriate for yourself depending on your market knowledge and experience, the creation, management and on-going monitoring of your account.

Your privacy is important to us and it is our policy to respect the confidentiality of information and the privacy of individuals. However, there are certain circumstances in which we may disclose your personal information which includes:

- other companies within the ITI Group who provide support services;
- service providers who have been contacted to provide us with administrative, regulatory, IT, financial and research or other services;
- credit providers, courts, tribunals and applicable regulatory authorities as agreed or authorised by law or our agreement with you;

- credit reporting or reference agencies; and
- you have consented to the disclosure.

We may collect your personal data in order to keep you informed about our send you information about our latest product and service announcements, industry newsletters and publications.

You always have the right to opt out of receiving our marketing. You can exercise the right at any time by contacting us at [customerservice@iticapital.com](mailto:customerservice@iticapital.com). If we send you any marketing emails we will always provide an unsubscribe option to allow you to opt out of any further marketing materials.

Please note, you cannot opt out from receiving communications dedicated to servicing your account.

## DATA RETENTION

ITI Capital shall hold personal data for a period of at least 5 years in order for us to comply with our record keeping obligations under the Money Laundering Regulations 2017.

At the end of that period, ITI Capital will be required to delete all personal data relating to you, unless a legal requirement requires us to keep the data for a prolonged period of time or you have expressly consented to your data being held for an extended period of time.

## YOUR PERSONAL DATA RIGHTS

You will have the following rights with respect to your personal data:

- the right to access personal data (please note, we may require a small charge for this service);
- the right to request the personal data regarding yourself is corrected if it is found to be inaccurate;
- the right to request that your personal data is erased where it is no longer necessary;

## YOUR PERSONAL DATA RIGHTS CONTINUED

- the right to withdraw consent to processing at any time, where relevant;
- the right to restrict processing where there is a dispute in relation to the accuracy or processing of the personal data;
- the right to request that ITI Capital provide you with your personal data and where possible, transmit that data to another data controller (only applies where the processing is based on consent or is necessary for the performance of a contract with you and in either case the data controller processes the data by automated means);
- the right to object to the processing of personal data (only applies where processing is based on a legitimate interest);
- the right not to be subject to a decision which is based solely on an automated processing, including profiling which produces legal effects concerning them or similarly significantly affects them.

## COOKIES

Cookies are small text files placed on your computer to collect standard internet log information and visitor behaviour information. We use cookies to provide analytics and to share your preferences.

If you want to delete cookies that are already on your device, you can do this by deleting your browser history

or visit [www.aboutcookies.org](http://www.aboutcookies.org). You can also block cookies by activating the setting on your browser that allows you to refuse the setting of some or all cookies. However, in a few cases, you may not be able to access parts of our website.

## WHAT IF YOU HAVE A COMPLAINT?

If you have a concern about our privacy practices or where you believe your data has not been processed in a way that does not comply with GDPR, you can make a complaint which will be acted on promptly. To make a complaint, please contact us on the details provided below.

If you are not satisfied with our response, you have the right to submit a complaint to our supervisory authority, the Information Commissioner's Office (ICO). You can contact them on their helpline on 0303 123 1113 or alternatively you could visit their website at <https://ico.org.uk/> to find out more.

## HOW TO CONTACT US

If you have any questions about this Policy or want to exercise your rights, please contact us at:

Post:

ITI Capital Limited  
Level 33, Tower 42  
25 Old Broad Street  
London EC2N 1HQ

Telephone: 020 7562 8017

Email: [accountmanagement@iticapital.com](mailto:accountmanagement@iticapital.com)

**ITI Capital Limited**

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**RISK WARNING:** Trading financial markets on margin carries a high level of risk, and may not be suitable as losses can exceed deposits.

**DISCLAIMER:** Trading financial markets on margin carries a high level of risk, and may not be suitable as losses can exceed deposits. You should be aware and fully understand all risks associated with financial markets and trading. Prior to trading any products offered by ITI Capital Limited, you should carefully consider your financial situation and your level of experience and understanding. ITI Capital Limited assumes no liability for errors, inaccuracies or omissions and does not warrant the accuracy, completeness of information, text, graphics, links or other items contained within these materials. You should read and understand the Terms and Conditions on the ITI Capital Limited website prior to taking further action.

ITI Capital Limited is a registered company in England and Wales [Registration No. 02926252], authorised and regulated in the United Kingdom by the Financial Conduct Authority [Registration No. 171487] and is a member of the London Stock Exchange and of ICE Europe. The registered address of ITI Capital Limited is Level 33 Tower 42, 25 Old Broad Street, London EC2N 1HQ, United Kingdom.