



# Why do we process your information?

Last updated 29 August 2022

The section below explains what personal information is necessary for each purpose. We keep our processes and data collection under review and will update this notice should any personal information no longer be necessary for the given purpose.

The lawful basis column explains how we comply with a technical legal justification for data processing under data protection laws. Please contact us if you have any questions.

Purpose & description	Personal information	Lawful basis for processing (UK individuals)	Lawful basis for processing (UAE individuals)
<p>To <b>assist with your enquiries</b>.</p> <p>For example, our sales team may respond to your request for a demo or our compliance team may respond to your legal enquiry or complaint.</p>	<p>general details</p> <p>account details</p> <p>details of your query</p>	<p>Necessary for our <b>legitimate interest</b> in responding to enquiries, complying with the law and best practices or, as the case may be, necessary for <b>taking steps prior to entering into a contract</b> or the <b>performance of our contract</b> with you.</p>	<p>Your <b>consent</b> or, as the case may be, as is necessary for <b>taking steps prior to entering into a contract at your request</b> or the <b>performance of our contract</b> with you.</p>
<p>We may <b>record our calls</b> with you for compliance, transaction records and crime prevention purposes.</p> <p>For example, we may record calls in and out of our sales team and any dealing instructions.</p>	<p>general details</p> <p>account details</p> <p>details of your query</p>	<p>Necessary for our <b>legitimate interest</b> in documenting enquiries and business transactions for compliance, governance and crime prevention purposes.</p>	<p>Your <b>consent</b>.</p>
<p>To <b>provide our services</b> to you, such as our website, app, client portal, trading platform, market data and other content.</p> <p>For example, when you visit our website, your browser will provide your IP address, browser type and other technical information to enable us displaying our content in a compatible manner. If you login we will verify your account name, password and multifactor authentication data before granting access.</p>	<p>general details</p> <p>account details</p> <p>device and browser details</p> <p>usage data</p>	<p>Necessary for our <b>legitimate interest</b> in providing our services to the public and our customers, complying with the law and best practices or, as the case may be, necessary for the <b>performance of our contract</b> with you as our customer and compliance with our <b>legal obligations</b>.</p>	<p>Necessary for the <b>performance of our contract</b> with you or compliance with our <b>legal obligations</b>.</p>
<p>To enable you to set up and maintain your <b>user account</b>, carrying out a <b>credit reference check</b> and <b>service appropriateness check</b>.</p> <p>For example, we will request your documentation to verify your identity and comply with our "know your customer" responsibilities. We will request information about your experience as investor to assess which services are appropriate for you. We will carry out checks for anti-money laundering, fraud prevention and similar purposes and share your information with credit reference agencies and similar organisations. A record of any fraud or money laundering risk will be retained by such organisations, and may result in others refusing to provide products or services to you.</p>	<p>general details</p> <p>identity details</p> <p>replies to our questionnaire</p> <p>account details</p> <p>payment details</p>	<p>Necessary for the <b>performance of our contract</b> with you, compliance with our <b>legal obligations</b> and to satisfy our <b>legitimate interest</b> in acting as a responsible broker, knowing our customers, complying with best practice or applicable laws.</p>	<p>Necessary for the <b>performance of our contract</b> with you or compliance with our <b>legal obligations</b>.</p>

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<p>To enable you to <b>fund and use your account</b> by paying a deposit and purchasing services.</p> <p>For example, our third party payments vendor will collect your payment card information if you make a deposit.</p>	<p>general details</p> <p>account details</p> <p>payment details</p>	Necessary for the <b>performance of our contract</b> with you.	Necessary for the <b>performance of our contract</b> with you.
<p>To send you <b>service communications</b> about matters relevant to your use of our services and your engagement with us, such as surveys or other forms of active engagement, prize draws, availability of new services, changes in our terms, transaction records, etc.</p>	<p>general details</p> <p>account details</p>	Service communications are necessary for <b>the performance of our contract</b> with you or, as the case may be, necessary for our <b>legitimate interest</b> in satisfying your requests, facilitating our services and organising related activities.	Necessary for the <b>performance of our contract</b> with you.
<p>To <b>assess your job application</b> and for business administration purposes.</p> <p>For example, if you apply for a job, we will review your CV, publicly available information about you, information from your previous employers, professional references, criminal and credit check and other information. We may use automated decision-making to eliminate applicants who fail to meet the basic criteria for a role.</p>	<p>general details</p> <p>details of your query</p> <p>public data</p> <p>third party data</p> <p>special categories data</p>	Necessary for our <b>legitimate interest</b> in responding to you query and, as the case may be, necessary for <b>taking steps prior to entering into a contract</b> . Special categories data may be processed as is necessary in the context of <b>employment and social security laws</b> .	Your <b>consent</b> or, as the case may be, as is necessary for <b>taking steps prior to entering into a contract at your request</b> or the <b>performance of our contract</b> with you or compliance with our <b>legal obligations</b> .
<p>To <b>understand our audiences and customer profiles</b> for product and service development, research, market intelligence, marketing, advertising, content personalisation and business administration, as described below. Depending on purpose, we use your profile information in anonymised or pseudonymised or, when it comes to marketing by say email, identifiable form, e.g. your email address. In some cases, this will include information observed or inferred from your activity or other information about you.</p>	<p>general details</p> <p>account details</p> <p>device and browser details</p> <p>usage data</p> <p>transaction data</p> <p>public data</p> <p>preferences and interests</p> <p>engagement information</p> <p>third party data</p> <p>opportunity records</p>	<p>Necessary for our <b>legitimate interest</b> in understanding our typical customer profiles and demographics, for service development, research, market intelligence, marketing, advertising, content personalisation and business administration.</p> <p>Where required by law, we rely on your <b>consent</b> to deploy <b>cookies or similar technologies</b> on your device or to read information on your device except where necessary for essential services (please see our <a href="#">cookies notice</a>).</p>	You <b>consent</b> .
<p>To <b>develop our features, services and organisation</b> based on our anonymised surveys and audience data, reports and third party tools which rely on pixels or similar scripts to measure relevant events.</p> <p>For example, we deploy a tool which shows where your mouse travels on our website to measure the popularity of our content and features. Analytics tools help us understand your country, age group, pages visited before and after and other statistical demographic information about you and other users. Anonymous website statistics are used to decide which part of our services are not popular or may need further development to cater for our primary markets. In limited cases, it may be necessary to use your pseudonymised information to develop personalisation and similar features.</p>	<p>anonymised audience data</p> <p>In limited cases (e.g. to develop personalisation features)</p> <p>pseudonymised customer profile data.</p>	<p>Necessary for our <b>legitimate interest</b> in product development and keeping our services relevant.</p> <p>Where required by law, we rely on your <b>consent</b> to deploy <b>cookies or similar technologies</b> on your device or to read information on your device except where necessary for essential services (please see our <a href="#">cookies notice</a>).</p>	You <b>consent</b> .

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<p>To <b>conduct industry research</b> for internal and external use.</p> <p>For example, anonymous transaction statistics allow us release reports about what asset types in what volumes are trending with retail customers.</p>	anonymised audience data	Necessary for our <b>legitimate interest</b> in utilising industry knowledge for strategic business decisions as well as sharing knowledge with the public.	You <b>consent</b> .
<p>To send you <b>risk management messages</b> or restricting scope of our services based on your risk profile, which may include automated tools.</p>	pseudonymised customer profile data	Necessary for our <b>legitimate interest</b> in acting as a responsible broker and understanding our customer risk profiles and necessary for compliance with our <b>legal obligations</b> .	Necessary for compliance with our <b>legal obligations</b> or to <b>protect your interests</b> as our customer.
<p>To <b>send you relevant marketing</b> communications about our existing and new products and services by <b>email, text, push, post</b> or other channels if you sign up for a demo or if you are our existing customer.</p> <p>Our marketing tools rely on cookies and similar scripts to track your interaction with our marketing messages, such as open rates or content clicked on, to optimise campaign performance.</p>	general details account details	<p>We rely on your <b>consent</b> if you sign up or on <b>soft opt-in</b> (presumed consent) if you are our existing customer. You can unsubscribe at any time.</p> <p>Where required by law, we rely on your <b>consent</b> to deploy <b>cookies or similar technologies</b> on your device or to read information on your device except where necessary for essential services (please see our <b>cookies notice</b>).</p>	You <b>consent</b> .
<p>To display relevant <b>advertisements</b> on <b>websites, apps, social media</b> and other inventory. Our advertising tools rely on cookies, similar scripts and advertising ID solutions and complex automated processes and decision-making. However, we use pseudonymised information that does not include your name or similar information, except in limited cases where your details such as your email address is needed to identify you on social media for advertising purposes.</p> <p>We rely on your customer profile data to understand your interests and preferences known, observed and inferred to design marketing and advertising campaigns that are relevant to you (also known as “<b>profiling</b>”, “<b>personalisation</b>” and “<b>predictive analytics</b>”), use an ID such as your hashed email address to identify you within third party datasets without actually disclosing your email and allocate your profile to relevant audience segments (also known as “<b>matching</b>”, “<b>data enrichment</b>”, “<b>targeting</b>”) or matching you against our typical customer profile (creating “<b>lookalike audiences</b>”), and measuring conversion events linked to your advertising ID to <b>optimise campaign performance</b>.</p>	general details pseudonymised customer profile data	<p>Where required by law, we rely on your <b>consent</b> to deploy <b>cookies or similar technologies</b> on your device or to read information on your device except where necessary for essential services (please see our <b>cookies notice</b>).</p> <p>Some of our marketing and advertising activities are necessary for our <b>legitimate interest</b> in understanding your interests from the information available to us, information observed or inferred and third party information, in promoting our business and understanding campaign metrics.</p>	You <b>consent</b> .

Purpose & description	Personal information	Lawful basis for processing (UK individuals)	Lawful basis for processing (UAE individuals)
<p>To deliver <b>personalised news, market insights, notifications and other content</b> to you based on your investment interests.</p> <p>The feature relies on numerous datapoints concerning you, your trading behaviour and the content you look at online. This will include information such as your age, industry, country of residence, currency, content browsing history, time spent on content, but also your <b>investment portfolio, details about your trading instructions, profit, how often you fund your account</b>, your <b>balance</b> and other information.</p> <p>The information is ingested by our partner Alphastream in encrypted and pseudonymised form and analysed using its proprietary algorithm to create your profile which is then allocated in audience segments. Once we establish your areas of interest we source and present you and other customers in the same audience segments with relevant content from third party content providers and the Internet.</p> <p>Alphastream.io Limited acts as our service provider. It will also anonymise your data for its own legitimate purposes such as product development. Please see <a href="https://alphastream.io/privacy-policy">https://alphastream.io/privacy-policy</a> for more information.</p>	<p>pseudonymised customer profile data</p>	<p>Necessary for our <b>legitimate interest</b> in providing a competitive service with useful and innovative features.</p> <p>Where required by law, we rely on your <b>consent</b> to deploy <b>cookies or similar technologies</b> on your device or to read information on your device except where necessary for essential services (please see our <b>cookies notice</b>).</p>	<p>You <b>consent</b>.</p>
<p>To <b>manage our professional relationship</b> with you using our record management systems and engagement tools, identifying opportunities, contacting you by phone and sending you marketing communications.</p>	<p>general details</p> <p>details of your query</p> <p>professional opportunity records</p>	<p>Necessary for our <b>legitimate interest</b> in understanding and maintaining our business relationships and administering our business. You have the right to unsubscribe from marketing at any time.</p>	<p>Your <b>consent</b> or, as the case may be, as is necessary for the <b>performance of our contract</b> with you.</p>
<p>To <b>publish information about</b> individuals such as <b>company officers, shareholders and other rights holders</b> from publicly available sources such as company reports, regulatory filings and press releases to provide market information to our customers in connection with our services.</p>	<p>public data</p>	<p>Necessary for our <b>legitimate interest</b> in providing useful content to our customers.</p>	<p>Necessary for advancing the <b>public interest</b> in publishing market data.</p>

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<p>To <b>ensure proper administration of our organisation</b>, including to:</p> <ul style="list-style-type: none"> <li>• keep appropriate records about how our services are used;</li> <li>• resolve complaints;</li> <li>• conduct troubleshooting;</li> <li>• conduct equality monitoring;</li> <li>• ensure the health &amp; safety and make reasonable adjustments to accommodate special needs;</li> <li>• register interactions with our communications, such as emails;</li> <li>• enforce our terms;</li> <li>• debt collection; and</li> <li>• similar purposes.</li> </ul>	<p>all information as is necessary and proportionate for the administration of our organisation</p>	<p>Necessary for our <b>legitimate interest</b> in the proper administration of our organisation and services and necessary for compliance with our <b>legal obligations</b> or activities <b>in the substantial public interest</b>.</p>	<p>Necessary for the <b>performance of our contract</b> with you or, as the case may be, as is necessary to <b>establish, exercise or defend legal claims</b> or comply with our <b>legal obligations</b>.</p>
<p>To engage our <b>third party service providers</b> who may process your personal information on our behalf to facilitate the provision of our services and the fulfilment of essential service functions which we cannot fulfil ourselves, such as web hosting, cloud storage, IT, analytics, payments, plugins, communications, accounting, security, CCTV and others as well as our advisors such as lawyers, accountants, insurers and others.</p>	<p>all information as is necessary and proportionate to enable the relevant service</p>	<p>Some activities are necessary for the <b>performance of our contract</b> with you, others are necessary for our <b>legitimate interest</b> in ensuring the proper operation of our services.</p>	<p>Necessary for the <b>performance of our contract</b> with you or compliance with our <b>legal obligations</b>.</p>
<p>To <b>introduce you to third parties</b> who will provide additional services if you expressed an interest or requested such services.</p>	<p>all information as is necessary and proportionate to enable the relevant third party service</p>	<p>Some activities are necessary for the <b>performance of our contract</b> with you, others are necessary for our <b>legitimate interest</b> in providing you a good user experience, or subject to your <b>consent</b>.</p>	<p>Your <b>consent</b> or, as the case may be, as is necessary for the <b>performance of our contract</b> with you.</p>
<p>To <b>share</b> information with our affiliated companies.</p> <p>For example, we may outsource certain functions to our affiliated companies or engage in group-wide marketing campaigns.</p>	<p>all information as is lawful, necessary and proportionate</p>	<p>Necessary for our <b>legitimate interest</b> in using our group's resources to organise, develop and deliver our services, run our organisation and decide on future strategies.</p>	<p>Necessary for the <b>performance of our contract</b> with you or compliance with our <b>legal obligations</b>.</p>
<p>To <b>share</b> information with <b>public authorities</b> or <b>regulators</b> to comply with our legal obligations as a financial services regulated firm.</p>	<p>all information as is lawful, necessary and proportionate</p>	<p>Where processing or sharing your data is necessary for compliance with a <b>legal obligation</b> to which we are subject, or, where necessary and proportionate, in order to satisfy our <b>legitimate interest</b> in complying with best practice or applicable laws.</p>	<p>Necessary for the <b>performance of our contract</b> with you or, as the case may be, for compliance with our <b>legal obligations</b>.</p>
<p>To ensure <b>health and safety</b> at our <b>premises</b>.</p> <p>For example, depending on circumstances, we may introduce additional procedures to protect our staff from transmissible diseases.</p>	<p>special category data relating to health</p>	<p>Necessary for our <b>legitimate interest</b> in ensuring the health and safety of our staff and others, to comply with best practice or necessary for compliance with our <b>legal obligations</b> or activities <b>in the substantial public interest</b>.</p>	<p>Necessary for compliance with our <b>legal obligations</b>, to <b>protect public health</b> as required by law, or necessary to <b>protect you and your interests</b>.</p>

Purpose & description	Personal information	Lawful basis for processing (UK individuals)	Lawful basis for processing (UAE individuals)
<p>To ensure the <b>safety</b> of people, <b>security</b> of our premises, the security of our systems and online services.</p> <p>For example, we may <b>monitor</b> our networks, website, systems and premises <b>for suspicious activities</b>, test and audit our systems and deploy appropriate security measures.</p>	<p>device and browser details</p> <p>usage data</p> <p>CCTV data</p>	<p>Necessary for our <b>legitimate interest</b> in ensuring the security of our organisation, people and services and necessary for compliance with our <b>legal obligations</b>.</p>	<p>Necessary for compliance with our <b>legal obligations</b> or <b>licence conditions</b>, or to <b>protect you and your interests</b>.</p>
<p>To <b>monitor</b> interactions and operations <b>for the prevention and detection of crime including fraud</b>, and <b>share</b> information with law enforcement authorities and other stakeholders.</p>	<p>all information as is lawful, necessary and proportionate</p>	<p>Necessary for our <b>legitimate interest</b> in detecting and preventing fraud and illegal conduct and necessary for compliance with a <b>legal obligation</b> to which we are subject.</p>	<p>Necessary for compliance with our <b>legal obligations</b> or necessary to <b>establish, exercise or defend legal claims</b>.</p>
<p>To <b>share</b> data with another organisation in accordance with the law for the purposes of a <b>joint venture, collaboration, financing, sale, merger, reorganisation or similar event</b> relating to our organisation.</p>	<p>all information as is lawful, necessary and proportionate</p>	<p>Necessary for our <b>legitimate interest</b> in acting in the best interest of our shareholders and investors and complying with our <b>legal obligations</b>.</p>	<p>Necessary for compliance with our <b>legal obligations</b>.</p>
<p>To process and share information as is required for our <b>compliance with the law</b> or to <b>establish, exercise or defend legal claims</b>.</p> <p>To process and share information with other third parties <b>where required by law</b>, such as regulators, law enforcement agencies or where mandatory under a court order.</p>	<p>all information as is lawful, necessary and proportionate</p>	<p>Where processing or sharing your data is necessary for compliance with a <b>legal obligation</b> to which we are subject, to <b>establish, exercise or defend legal claims</b>, or, where necessary and proportionate, in order to satisfy our <b>legitimate interest</b> in complying with best practice or applicable laws.</p>	<p>Where processing or sharing your data is necessary for compliance with a <b>legal obligation</b>, or to <b>establish, exercise or defend legal claims</b>.</p>

We will update you about any new purposes of processing of your personal information from time to time, and we will obtain your prior consent for such new purposes where we are required to do so at law.