

# PRIVACY POLICY

<b>Version Number</b>	<b>Reason for Update</b>	<b>Date of Release</b>	<b>Amended By</b>
1.0	Initial publication of document	01-Feb-19	AH
1.1	Changes in formatting	13-Dec-19	AH
1.2	Annual Review	08-Jan-20	AH

## Table of Contents

1. COLLECTION AND USE OF YOUR PERSONAL INFORMATION .....	3
2. USE OF COOKIES AND OTHER ELECTRONIC TOOLS .....	3
3. DISCLOSURE OF YOUR PERSONAL INFORMATION .....	4
4. ACCURACY, SECURITY, AND RETENTION OF YOUR PERSONAL INFORMATION .....	4
5. RIGHTS WITH RESPECT TO YOUR PERSONAL INFORMATION .....	4
6. TRANSFER OF YOUR PERSONAL INFORMATION TO OTHER COUNTRIES .....	5
7. LINKS TO THIRD-PARTY WEBSITES .....	5
8. QUESTIONS .....	5
9. COMPLAINTS .....	5
10. MODIFICATIONS .....	5

## 1. COLLECTION AND USE OF YOUR PERSONAL INFORMATION

---

Basis Capital Markets UK Ltd. (“Basis”) respects the privacy rights of our clients. Our Privacy Policy will help you understand what personal data we collect, why we collect it and what we do with it. Please take a moment to familiarise yourself with our privacy practices and let us know if you have any questions by sending us an email or submitting a request through our website.

Basis collects personal information that you voluntarily provide on this Web site or offline in connection with your account application, which may include your name, address, email address, contact information, etc.

Do not provide information about others unless you are authorized to do so and consent to have all information used, disclosed, and transferred in accordance with this Privacy Policy. By submitting the information about others, you represent and warrant that you are authorized to do so and that you have received authorization from the person about whom you are providing the information and that person has consented to have all information used, disclosed, and transferred in accordance with this Privacy Policy.

We use this information for carefully considered business purposes, which include some or all of the following to:

- communicate with you
- provide our services and products
- help Basis improve our services and products and develop new services and products
- provide support for our services and products, and for internal quality control purposes
- provide you with offers and promotions about services and products of Basis or of other parties that may be of interest to you
- enhance your experience with this Web site, including to save your preference and login information
- analyze web site usage and analyze use of the Web site
- protect the interests, rights, safety of Basis and to monitor compliance with and enforce the terms of any agreement with Basis
- operate our services, products, and systems properly.

## 2. USE OF COOKIES AND OTHER ELECTRONIC TOOLS

---

Basis and the parties with whom we work (e.g., service providers, business partners) may place, view, and/or use “cookies”, Web server logs, Web beacons, or other electronic tools to collect statistical and other information about your use of this Web site and other websites. Basis and the parties with whom we work may use the information collected for various reasons, either on behalf of Basis or for the other parties’ purposes, including research, analysis, to better serve visitors to this Web site to compile aggregate and anonymous information about usage of this Web site and other websites, other statistics, etc. However, if you have deleted and disabled cookies, these uses will not be possible to the extent they are based on cookie information.

To assist us with the uses described in this Privacy Policy, information collected about your use of this Web site or other websites may be aggregated, analyzed or combined with personal or other information about you from other online or offline sources. If you prefer that we not combine non-personal information that has been collected, through cookies, about your use of this Web site or other websites with personal or other information about you, then please delete and disable cookies for each browser, on each computer you use to surf the Web.

Most browsers are set to accept cookies by default. If you prefer, you can usually set your browser to disable cookies, or to alert you when cookies are being sent. Likewise, most mobile devices allow you to disable the ability

for geo-location information to be collected from your mobile device. The help function on most browsers and mobile devices contains instructions on how to set your browser to notify you before accepting cookies, disable cookies entirely, or disable the collection of geo-location data. You need to set each browser, on each device you use to surf the Web. Thus, if you use multiple browsers (e.g., Chrome, Safari, Internet Explorer, Firefox, etc.), you should repeat this procedure with each one. Similarly, if you connect to the Web from multiple devices (e.g., work and home), you need to set each browser on each device. Depending on your jurisdiction, you may be able to utilize additional cookie management tools. However, if you disable cookies or refuse to accept a request to place a cookie, it is possible that some parts of this Web site, such as polls, surveys, contests, and product sales, and certain areas of the Web site for which you need to log in, will not function properly, and the notifications you receive when you visit this Web site may not be advertisements tailored to your interests.

### **3. DISCLOSURE OF YOUR PERSONAL INFORMATION**

---

Basis may share your personal information with our affiliates (including affiliated websites under common ownership or may share with other third parties information about our Web site users, such as your use of this Web site or other websites, and the services provided control) and designated service providers, including for the purposes set out in this Privacy Policy.

Basis may also disclose your personal information to unaffiliated third parties if we believe in good faith that such disclosure is necessary to: (a) comply with any applicable law, rule, or regulation, or in response to a subpoena, court order, or other legal process, subject to Basis's Law Enforcement Data Request Statement; (b) protect the interests, rights, safety, or property of Basis or others; (c) monitor compliance with and enforce any terms of service on this Web site; (d) provide our services and products (including allowing a purchaser of Basis or a Basis division to continue to serve you); (e) perform other activities related to such services and products, including billing and collection; (f) provide you with offers or promotions from Basis; or (g) operate the systems that provide our services and products properly.

The collection, further use, and/or disclosure of your information by Third-Party Providers or by other third parties is not the responsibility of Basis. Rather, such collection, use, and/or disclosure is governed by the third parties' privacy policies.

### **4. ACCURACY, SECURITY, AND RETENTION OF YOUR PERSONAL INFORMATION**

---

Any personal information you provide to Basis is kept on secure servers. Basis uses security measures appropriate to the provision of the relevant product or service, such as reasonable administrative, technical, personnel, and physical measures (a) to safeguard personal information against loss, theft, unauthorized use, disclosure, or modification; and (b) to ensure the integrity of the personal information. To help us protect your privacy, you should maintain the secrecy of the logon ID and password you may have set up in connection with your participation in our services. Personal information is retained for as long as is necessary for the purpose for which it is collected, including legitimate business reasons, and/or legal and regulatory requirements.

### **5. RIGHTS WITH RESPECT TO YOUR PERSONAL INFORMATION**

---

Depending on the jurisdiction, you may have the right to access, correct, delete, or restrict use of certain personal information covered by this Privacy Policy. Depending on the jurisdiction, you may also have the right to request that we refrain from processing personal information. Please bear in mind that if you exercise such rights this may affect our ability to provide our products and services. While Basis will make reasonable efforts to accommodate your request, we also reserve the right to impose certain restrictions and requirements on such requests, if allowed or required by applicable laws.

Please note that it may take some time to process your request, consistent with applicable law.

## 6. TRANSFER OF YOUR PERSONAL INFORMATION TO OTHER COUNTRIES

---

Some of the uses and disclosures mentioned in this Privacy Policy may involve the transfer and processing of your personal information to and in various countries that may have different levels of privacy protection than your country. By using our products and services, you consent to such transfers and processing, including to and in the United Kingdom.

## 7. LINKS TO THIRD-PARTY WEBSITES

---

Basis may provide links to third-party websites, including social networking websites. Since we do not control third-party sites and are not responsible for any information you may provide while on such sites, we encourage you to read the privacy policies on those websites before providing any of your information on such sites.

## 8. QUESTIONS

---

For further information regarding this Privacy Policy, please contact us using one of the following methods:

**By Email:**

[compliance@basiscap.com](mailto:compliance@basiscap.com)

**By Post:**

Head of Compliance  
Basis Capital Markets UK Ltd.  
Scott House, Waterloo Station  
London  
SE1 7LY  
United Kingdom

## 9. COMPLAINTS

---

You have the right to lodge a complaint to the Information Commissioners' Office if you believe that Basis has not complied with the requirements of GDPR with regard to your Personal Data.

## 10. MODIFICATIONS

---

Basis reserves the right to change this Privacy Policy at any time by posting revisions on this Web page. Such changes will be effective upon posting.

\*\*\*