



Dear Valued Client,

### **Data Protection law is changing**

The General Data Protection Regulation (GDPR) came into effect on May 25, 2018. GDPR will specifically deal with how businesses and the public sector handle the information of European citizens.

This means that any business that holds any data on EU citizens, from personal information such as credit cards numbers to even a simple a photo, is subject to GDPR (Any information relating to a living, identified or identifiable natural person is relevant).

### **What does GDPR mean for you?**

GDPR introduces greater transparency so that individuals know how we will use their personal data, gain more control over it and know that their privacy is respected and their personal data protected.

We take privacy seriously, and are committed to managing and protecting personal data appropriately and meeting our regulatory requirements.

### **Collecting your Data**

We may collect certain personal data with respect to you, including, without limitation:

- All personal data provided by you such as:
  1. Name and contact details
  2. Nationality and national identity number(s)
  3. Tax status, tax identification number (such as National Insurance Number)
  4. History of employment
  5. Director or officer roles and income
  6. Bank account details
  7. Information on income and personal wealth, and
  8. Information on investigations, litigation, court proceedings, civil liabilities or criminal convictions against you.
- Information on how and when you use our websites and links to them
- Where permitted, information received from credit reference agencies, fraud prevention agencies and from other public sources such as Companies House, and
- We may monitor and/or record your telephone calls and electronic transactions.

We will only collect and process your sensitive personal data (such as health data) with your explicit consent or where the processing is specifically authorised by a regulatory body or required by law.

### **How will we use your personal data?**

We will use your personal data for:

- The provision of products and/or services requested by you
- Managing your accounts
- Detecting and preventing fraud and/or money laundering
- Statistical analysis and assessment, and
- Otherwise as is necessary to comply with applicable laws, regulations and/or codes of practice.

The provision of personal data by you may be necessary in order for us and other third parties ( to which personal data is disclosed) to provide you with the requested services, for the performance of any contractual relationship with you and for the other purposes as set out in this Notice where in our legitimate interests.

## How do we disclose your personal data?

We may disclose certain personal data:

- To our professional advisors, receivers and administrators (where applicable), and service providers (including, information technology systems providers)
- To your professional advisors, to courts, governmental and non-governmental regulators and ombudsmen;
- To law enforcement agencies
- As is required and/or permitted by law
- Where you have been introduced to us by an introducer (e.g. an independent financial adviser) we will inform the introducer of the outcome of the enquiry including whether we have agreed to provide you with the relevant product or service
- With fraud prevention agencies who will use it to prevent fraud and money-laundering and to verify your identity. If fraud is detected, you could be refused certain services, finance or employment.

## Transfer of personal data outside of the European Economic Area (EEA)

We will not transfer your personal data to recipients located in countries outside of the EEA.

## Your Rights

Under applicable EU data privacy laws, you may have a right to:

- Request access to and rectification or erasure of your personal data
- Obtain restriction of processing or to object to processing of your personal data, and
- Data portability (i.e. to request the transfer of personal data from one data controller to another in certain circumstances).

If you wish to exercise any of these rights you should contact Max Kapp ([info@captafx.com](mailto:info@captafx.com)). You also have the right to lodge a complaint about the processing of your personal data with your local data protection authority.