



DART CAPITAL

Privacy Policy

May 2018

Dart Capital Limited (we or us) is committed to protecting and respecting your privacy. This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. For the purpose of the General Data Protection Regulation (GDPR) and its predecessor legislation The Data Protection Act 1998 (the Act), the data controller is Dart Capital Limited. Dart Capital Limited is authorised and regulated by the Financial Conduct Authority. Registered in England and Wales No. 02146006. FCA Registration No. 137569. Registered office: 4 Eastcheap, London, EC3M 1AE.

Information we may collect from you

We may collect and process the following data about you:

- If you contact us, we may keep a record of that correspondence.
- Data which is held in relation to living individuals who can be identified
 - from those data, or
 - from those data and other information which is in the possession of, or is likely to come into the possession of, the data controller, and includes any expression of opinion about the individual and any indication of the intentions of the data controller or any other person in respect of the individual.
- Your contact details, such as your name, address, telephone number and email address;
- Your date of birth, nationality, country of birth, country of residence, employment status and tax identification number (i.e. National Insurance Number);
- Passport details, driving licence and utility bills;
- Details of the services you request from us;
- Any records held by financial crime prevention agencies, on the Electoral Register and by providers of utility services; and
- Details of your employment status, income and source of wealth.

Dart Capital

4 Eastcheap London EC3M 1AE
Tel: 020 7283 1117
Fax: 020 7283 0891

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Company number: 2146006
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In some cases, you are not obliged to provide any personal data to us, but if you have requested information or a service from us, we will not be able to provide it without certain information, such as your contact details. Before we can begin providing you with our services, we need to obtain certain information about you, so that we can verify your identity in order for us to meet our obligations under the Money Laundering, Terrorist Financing and Transfer of Funds Regulations 2017 and any other applicable legislation and for the purposes of crime prevention and fraud prevention. **You are obliged to provide this information and if you do not provide it, we will be unable to provide you with our services.**

Data collected will be processed fairly and lawfully, and will only be processed where we comply with Article 6(1) of the GDPR. We will ensure that we meet one of the key principles when processing your personal data:

1. **Consent** - You have **given consent** to the processing your personal data for one or more specific purposes;
2. **Contract** - The processing is necessary for the performance of a **contract** to which the you and Dart Capital Limited data are party to or in order to take steps at the request of the data subject prior to entering into a contract;
3. **Legal Obligation** - the processing is necessary for **compliance with a legal obligation** to which the Dart Capital is subject;

The primary legal basis that we intend to use for the processing of your data is for the performance of our contract with you.

Where we store your personal data

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy. Such steps may include only transferring your data to jurisdictions in respect of which there is a European Commission adequacy decision or, where

this is not the case, by using model clauses which have been approved by the European Commission.

All information you provide to us is stored on our secure servers. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Uses made of the information

We use information held about you in the following ways:

- To undertake checks such as identification verification checks with fraud prevention agencies to enable us to comply with our anti-money laundering obligations and for the purposes of crime prevention and fraud prevention
- To carry out our obligations arising from any contracts entered into between you and us.
- To notify you about changes to our service.
- To provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes. You may opt out of receiving this information when we collect details or at any time by contacting us using the contact details below.

Disclosure of your information

We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If Dart Capital Limited or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- Our appointed auditors, accountants, lawyers and other professional advisers (e.g. compliance

- consultants), to the extent that they require access to the information in order to advise us;
- Fraud prevention agencies and other organisations to allow us to undertake the checks set out below. We will supply details of such agencies on request;
 - If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Terms and other agreements; or to protect the rights, property, or safety of Dart Capital Limited, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.
 - For the provision of services to you.

Access to information

The Act gives you rights about the information held about you. Your right of access can be exercised in accordance with the Act and is known as a Subject Access Request.

Right of Access

You will have the right to obtain, on request, confirmation as to whether your personal data is being processed, together with the following information:

- The purpose of processing your data
- Information about the recipients of your data
- Recipients or categories of recipient to whom the personal data will be disclosed (in particular third countries or international organisations)
- The right to lodge a complaint with a data protection authority
- In cases of automated processing, details of profiling
- Information about the sources of data

Information must be provided to you within one month at no cost to you. However we have the right to refuse or charge a reasonable fee when a request is manifestly unfounded or excessive, particularly if it is repetitive.

Under the GDPR, you also have the following rights:

- Right to be informed
- Right to rectification
- Right to be forgotten (erasure)
- Right to restrict processing
- Right to data portability
- Right to object
- The right not be subject to automated decision-making, including profiling

You have the right to withdraw consent at any time, this must be provided in writing.

Retention periods

Unless otherwise specified in this privacy policy, we keep your personal information only for as long as required by us:

- to provide you with the services you have requested;
- to comply with other laws, including for the period demanded by our tax authorities;
- to support a claim or defence in court.

Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail.

Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to the Data Protection Officer, Dart Capital Limited, 4 Eastcheap, London, EC3M 1AE.