

## **Summary Privacy Policy**

This document contains an overview of how we collect and use your information as at 15<sup>th</sup> May 2018.

### **Summary**

This is an overview of:

- The types of information we collect about you;
- How we will use your information;
- Who we can share your information with, including when we may transfer it overseas;
- The steps we'll take to make sure it stays private and secure;
- How long we will keep your information; and
- Your rights to your information.

### **More information**

For more details about information in this overview, please see our full Privacy Notice which will be available from 25<sup>th</sup> May 2018. As from that date you can view or download a copy by visiting [www.britannia.com/gi](http://www.britannia.com/gi).

### **Who we are**

Britannia Global Investments Limited is the data controller for your trading activity and ancillary activities in relation to your trading account(s) held with us as your broker. The data controller is responsible for deciding how your information is used and ensuring it is private and secure.

### **The types of information we collect**

We may collect information about you from various sources including (but not limited to):

- Directly from you;
- From a third party acting on your behalf e.g. an intermediary or another broker;
- From publicly available sources;
- From a third party contracted with ourselves to source information about you from publicly available sources in order to allow us to comply with laws and/or regulations as applied or required by regulatory authorities;
- When we generate it ourselves (e.g. Customer Due Diligence); and
- From other organisations.

We will only collect your information in line with relevant regulations and law and this may relate to any of our products or services you apply for, currently hold or have held in the past.

You are responsible for ensuring you provide us accurate and current information. If you provide information for another person on your account, you will need to advise them how to find the Privacy Notice and make sure they agree to us using their information for the purposes set out in it before you provide it to us.

### **How we will use your information**



We will only use your information where we are required to or can by law e.g., carrying out an agreement we have with you, fulfilling a legal obligation, because we have a legitimate business interest or where you agree to it.

We will also use it to provide any products and services you have requested.

This includes:

- To confirm your identity and address;
- To confirm your wealth and/or source of funds;
- To enable us to comply with relevant laws and regulations;
- To understand how you use your accounts;
- To carry out your instructions;
- To improve our products and services;
- To assist us in recovering any losses arising out of a breach of our terms and conditions;
- and
- To offer you other services we believe may benefit you unless you ask us not to.

We may use automated systems to help us verify your identity as well as carrying out fraud and money laundering checks.

#### **Who we can share your information with**

We may share your information with other group members and any subcontractors, agents, or service providers who work for us or other group companies. We may also share your information with others outside of the firm e.g. regulators, other financial institutions, brokers and agents, credit reference agencies and fraud prevention or other Police authorities.

#### **Transferring your information overseas**

Your information may be transferred and stored in countries outside the European Economic Area ("EEA"), including some that may not have laws that provide the same level of protection for personal information. When we do this, unless it is within our group of companies and for the reasons stated above, we will obtain your prior written permission and the firm will ensure the information that is transferred has an appropriate level of protection applied to it.

#### **The steps we'll take to make sure the information stays private and secure**

We will ensure that your information is kept secure by us and on our behalf as stated above and is only accessed by individuals who need to access it for the reasons stated above. If necessary this will be set out in an agreement with the relevant third party.

#### **How long we will keep your information**

We will maintain your information for the duration of your relationship with us. After the relationship ends, we will keep the information where we may need it for our legitimate purposes e.g. to help the firm respond to queries or complaints or for other reasons e.g., fraud and financial crime and responding to requests from regulators.

### **Your rights**

You have several rights relating to your information, for example:

- To see what we hold;
- To ask us to share it with another party;
- To ask us to update incorrect or incomplete details;
- To object to or restrict the processing of such data; or
- To make a complaint.