

## Privacy Policy

Argon Financial (“Argon”) is subject to the General Data Protection Regulation (“GDPR”) which came into effect in Gibraltar on May 25<sup>th</sup>, 2018. With it came the most significant changes to data protections laws in over two decades, ensuring services are designed with appropriate technical and organisation measures to meet the new data protection principles of the digital age.

Argon takes our clients privacy seriously and is committed to protecting you and the Personal Data we receive from you.

Argon has developed a data protection regime that is effective and fit for purpose, demonstrating an understanding and appreciation of the new requirements under the GDPR.

Personal Data means information that identifies you personally; your name, credit card information, photo and contact details, as well as data that is linked to your identity directly and indirectly.

This Policy has been designed to ensure all of our clients understand what Personal Data we collect and how it is used. Argon wants all its clients to feel confident and at ease about the privacy and security of the Personal Data provided to us.

### **Data Controller**

This notice applies to the controlling and processing activities of Argon. Argon provides spread betting and CFD trading services as well as the provision of safe custody and is the Data Controller for your Personal Data in relation to those activities and services.

### **Collection of your Personal Data**

Argon obtains your Personal Data through your use of our services; through any of our websites, a registration of interest, account opening application, both electronic and hard copy, a demo account application, or a webinar request and view.

Argon also obtains Personal Data from you when you like, post or otherwise interact with our social media pages on LinkedIn.

Argon also obtains additional Personal Data during the course of our relationship with you when you share information via email, over the telephone or via a chat function as well as through the use of our services and platforms.

We may collect the following information from existing, new or potential clients;

- Name, address and telephone numbers
- Date of birth
- Profession, employment status and details
- National insurance number or equivalent
- Information about your income and wealth
- Trading history and performance
- Email address
- Gender
- ID and/or passport number
- Tax identification details
- Details of assets and liabilities
- Other similar information

The information we collect from you is to ensure we know our clients and their experience to enable us to provide the best possible customer experience.

We also collect the above information to ensure we are complying with our regulatory and legal requirements.

We may ask for other personal information to enable us to provide a certain product or service, if you choose not to provide this information requested we may not be able to facilitate that product or service.

### **Trading Records**

Argon will keep records of all of your trading history, including;

1. products and performances of trades you have conducted yourself via one of our online platforms;
2. products and performances of trades we have conducted on your behalf, having received an electronic or telephone instruction;
3. historical data about the trades and/or shares placed with us and the treatment of such; and
4. any additional trading requests or access i.e. trading after hours and the terms agreed upon.

### **Communication Records**

Argon will record any communications, electronic, by telephone, in person or otherwise relating to any services we have or are providing to you during our relationship. These records will be our sole property and constitute evidence of the communications between us.

### **Banking Records**

Argon accepts funds to credit trading accounts via UK registered debit and credit cards and online bank transfers. This means that to process any of your transactions or payments you will be disclosing your Personal Data to third party payment processors, banks and in certain cases, other Investment Firms.

All funding information is securely stored on our inhouse systems and servers. We have a dedicated Accounts Department, ensuring limited access to banking records and ensure sufficient safeguards are in place to maintain the security of the banking details held on our clients.

### **Automatic Collection of Information**

Argon also maintains an activity log unique to each client, this log collects specific information relating to the access of our platforms; IP address, time and date of access and logging off and any system errors and crashes you receive, for example.

### **Ongoing Client Security**

Argon undertakes client file reviews on a regular basis to ensure that the information we hold on our clients is correct and up to date. These reviews are to validate your identity, obtain further information from you where required and to ensure the services we are providing are appropriate for you. Part of our review may include utilising online portals to validate your identity and residence on a 3<sup>rd</sup> party database.

### **Our Services**

Argon has a legitimate interest in the services and activities being conducted where we are;

- Providing customer support and answering any queries you may have
- Managing your account effectively to meet your needs
- Investigating a complaint you have raised
- Optimising our platforms and services to improve the quality of our offering to you
- Communicating as per our Communication Records Policy above

- Monitoring client activity on our platforms
- Providing best execution and ensuring clients are treated fairly at all times
- Maintaining compliance with all regulatory and legal requirements
- Responding to a legal claim

### **Storage, Security and Retention**

Argon has implemented precautionary measures to protect and secure all Personal Data and to protect your Personal Data from loss, misuse, unauthorised access or disclosure, alteration or destruction.

However, when accessing our websites and using the internet you should always take into consideration that it is an open forum and that data may flow across networks with little or no security measures, and your information could be accessed by people other than those you intended to access it.

Each employee has undergone training and understands the confidentiality required to protect Personal Data. Argon has a Data Controller who ensures compliance with this Policy and all applicable laws and legislations.

Argon holds Personal Data electronically, securely on our inhouse servers, paper-based files and other hard copy records are stored in-house or using our highly secure document archive facility based locally in Gibraltar. When Personal Data is no longer required, due to account closure, for example, we will remove any identifiable data and destroy all records.

Argon is subject to several laws and regulations which require us to retain copies of certain documents, records of transactions and communications with you and your relationship with us. Each retention period is specified by the applicable law or regulation.

We take in to account several different factors when determining our retention periods; our legal, regulatory and contractual obligations, the GDPR and tax and accounting requirements imposed.

### **Disclosure of Personal Data and Transfer to Processors**

Argon may, during the course of our standard operation of business, share selected information on our clients, within the European Economic Area (“EEA”);

1. Regulatory, governmental or law enforcement authorities as required by law or as agreed with you;
2. Insurers, service providers and suppliers who provide us with insurance, regulatory reporting and market access;
3. Professional advisors such as lawyers in connection to any opinions or legal proceedings and our auditors and accountants in order to satisfy our regulatory and financial reporting obligations;
4. Introducing Brokers and White Label partners with whom we have a mutual relationship (please note that Argon would ensure that each client was advised prior to any information being shared with an Introducer or White Label as per our Remuneration and Inducements Policy);
5. Online Portals utilised for client identification purposes to fulfil our requirements under the Money Laundering Directive; or
6. Any individual authorised by a client (a power of attorney)

Argon requests that all third parties who handle and or process our clients Personal Data acknowledge the confidentiality of the information they hold and respect all rights to privacy while

complying with all relevant data protection laws and this Privacy Policy. Where any third party utilises your Personal Data as a Data Controller, the use is not covered by this Privacy Policy and is not subject to any of Argon's policies or procedures.

Please note that 3<sup>rd</sup> parties such as, Online Portals may keep a record of any searches we conduct and may use the search details to assist other companies in performing their searches.

Should Argon be required to transfer Personal Data outside of the EEA, we would ensure that any transfer is lawful, and that appropriate standards and safeguards are in place.

As there are jurisdictions that do not recognise and maintain the same appropriate standards and safeguards of Data Protection as required under the GDPR Argon will ensure standard contractual measures are adopted and adhered to, as provided by the European Commission.

### **Cookies**

Cookies are a small piece of text that is stored on your computer or device when you visit certain websites and use certain apps. Argon does use cookies on its websites to ensure we provide an effective service, however any Personal Data that is recorded and or used during your session is deleted when you close our websites down and end the session.

### **Our Legal Obligations**

Argon has a legal obligation to protect, investigate and deter fraudulent, unauthorised or illegal activity.

Should we receive a request from a law enforcement agency or regulatory body we may be required to share certain Personal Data and related activity, or communications held on file.

### **Your Rights**

You have the right to object to us using, sharing or carrying out activities and services with your information, including using your Personal Data for marketing purposes (in certain instances Argon may send you emails notifying you of other products and offers we think may be of interest to you). Should you wish to exercise this right, please contact us immediately.

You also have the right to be informed in a clear and transparent manner about the way we handle, use and store your Personal Data.

You are entitled to access the information we hold on you, as stated in this Privacy Policy, to ensure we are maintaining the correct data and using it correctly. Should there be any errors on your record or information be incomplete you have the right to request that it be rectified.

You also have the 'right to be forgotten' in certain cases, this provides you the right to request for your information to be deleted or removed from our records.

You can request a restriction on the way we process your Personal Data, this means that we will continue to store your data, but we will not continue to use it. Please note that this will prevent you from utilising our platforms and trading services.

Should you wish for a copy of the Personal Data we hold electronically on you be transferred to a different service we can facilitate this, in certain circumstances.

Where you have provided consent for a particular service not covered by Our Services or Our Legal Obligations you have the right to withdraw the consent at any time.

If you are concerned in anyway about the privacy of your data you can make a complaint, please read our Complaints Policy which is available on our website, or in PDF format on request from our Compliance Department.

If you are not satisfied with our response or the handling of your complaint, you have the right to file a complaint with the Gibraltar Regulatory Authority (“GRA”). You can find further details on the GRA website.

### **Any Changes**

We may be required to make changes to this policy from time to time, Argon strongly recommends that you read and understand this policy on a regular basis.

Should you have any queries regarding this Policy, please contact our Data Controller via email on [clientservices@argonfinancial.com](mailto:clientservices@argonfinancial.com)

Should the content of this Policy be altered, it will be reviewed and approved by the Board of Directors.