

## **PRIVACY STATEMENT**

### **INTRODUCTION**

This privacy statement is made on behalf of Capital Index (Global) Limited (authorised and regulated by the Securities Commission of the Bahamas, SCB: SIA-F199) informing on the procedures regarding the collection, use and disclosure of personal information obtained or received when visiting our website and when using any service available through our website. Capital Index (Global) Limited is limited company incorporated under the laws of the Commonwealth of the Bahamas with registered office at Lyford Cay Financial Center, West Bay Street, P.O. BOX N-7776, Nassau, the Bahamas (Company No. 201024 B).

**The protection of privacy and the safeguarding of our Clients' personal and financial information is of great importance to us.**

The Company is responsible for the protection of the privacy and the safeguarding of clients' personal and financial information. By opening an account or establishing a business relationship with us, you give your consent to processing your personal information by the Company.

### **PURPOSE**

As a rule, the Company refrains from any type of disclosure of personal and/or non-public information when such disclosure is not directly linked to service its clients. The Company collects the necessary information required to open a client's account, establish a business relationship and to provide clients with the services they require.

This purpose of this privacy statement is to explain to you:

- what Personal Data of yours we collect;
- how we use your Personal Data;
- how, with whom and when your Personal Data is shared;
- your rights; and
- other useful privacy and security related matters.

We want to give you clear information about what information we collect and how we use it. We are committed to respecting your privacy and keeping your personal information. This privacy statement tells you what to expect when Capital Index collects personal information.

### **WHO WE ARE**

References in this document to "Group" are references to Capital Index Group, including Capital Index (UK) Limited, Capital Index (Cyprus) Ltd and Capital Index (Global) Limited and any entities under common ultimate beneficial ownership, namely Learn to Trade Group and SmartCharts Ltd who we work closely with to deliver the ultimate experience in trading. Each entity which collects or receives your data under the privacy notice does so as a data controller. Any member of the Group may use and share within the group, the information you provide and other information it holds about you for the purposes set out in the privacy notice, applying appropriate security measures to keep your information safe and secure.

SmartCharts Ltd and Learn to Trade Group may have specific privacy notices on their websites so when visiting or using these services please make sure you are informed of how they also use your information.

## **COLLECTION OF PERSONAL DATA**

Capital Index collects Personal Data from you when you apply for a trading account with us and throughout the time of doing business with you including when you visit our websites or communicate with us. We collect Personal Data including but not limited to:

- name,
- address,
- date of birth,
- gender,
- email address,
- IP address,
- phone number(s),
- your professional background,
- employment, profession and income source,
- banking details,
- trading experience,
- personal identification details such as passport or drivers licence,
- proof of address such as utility bills and bank statements, and
- other personal information we require to meet your needs and provide our services to you

Capital Index collects the necessary information required to open, transact and safeguard your client money, your privacy, and to provide you with the services you require. To this end, Capital Index gathers information from you and may, in certain circumstances, gather information from relevant banks and/or credit agencies, and/or other sources (such as compliance verification databases and similar service providers) as legally and regulatory obliged. We may also collect personal information about you from a third party such as an introducing broker.

## **HOW DO WE USE YOUR PERSONAL DATA?**

Capital Index uses Personal Data only as required to comply with regulatory requirements and/or provide quality service to you. We will not rent, swap or sell your personal information to other organisations for them to use in their own marketing activities without your consent.

The legal basis that we rely on for processing your data will depend upon the circumstances in which it is being collected and used, but will in most cases fall into one of the following categories:

- Where you have provided your consent to allow us to use your data in a certain way;
- Where the processing is necessary to carry out the performance of a contract with you;
- Where the processing is necessary for us to comply with a legal and/or regulatory obligation; or
- Where it is in our legitimate interests to perform our functions.

The Group may market additional products, services and promotions relevant to you and the products and services you require if you have given consent to us using data for such purposes.

If you do not want to receive marketing and promotional information of this nature for any reason, please contact us at the following address: [support@capitalindexglobal.com](mailto:support@capitalindexglobal.com)

Capital Index processes your Personal Data for the following purposes:

- Account setup, verification and management
- Evaluate and respond to Complaints
- Personalisation
- Risk Management
- Diagnostics, research and development
- Anti-money laundering independent verification
- Legal and regulatory obligations

## **PROTECTION OF PERSONAL DATA**

Any personal information you provide us will, subject to our Terms and Conditions, be treated as confidential and shared only within Capital Index Group and will not be disclosed to any third party except under any regulatory requirement, legal obligation or legitimate interests as described elsewhere in the Privacy Statement.

The personal information that you provide in connection with registering yourself as a Client of Capital Index is protected in many ways and stored safely on secure servers. Employees are trained to respect the confidentiality of customer information and the privacy of individuals. We take the safeguarding of your data very seriously. It is a function of our Compliance Department to ensure that our management of personal information is in accordance with this privacy statement and the applicable legislation.

## **SECURITY ARRANGEMENTS**

The Company has in place reasonable commercial standards of technology and operational security to provide protection for all information provided by users from loss, misuse, alteration or destruction. Further, the Company maintains physical, electronic and procedural safeguards that comply with applicable legal requirements and regulations to guard our clients' personal information and any other information, to ensure to our clients that their privacy is a major part of the Company's commitment to provide the finest services possible.

## **YOUR RIGHTS UNDER THE DATA PROTECTION (PRIVACY OF PERSONAL INFORMATION) ACT**

Please note that you have the right to access, rectify, erase, withdraw and/or restrict the processing of your personal data, to receive a copy of the personal data concerning you which you have provided to us and to object to our processing of your personal data. Further details can be found in our full Privacy Statement Policy.

To exercise any of your rights, or if you have any other questions about our use of your personal data please email us at [support@capitalindexglobal.com](mailto:support@capitalindexglobal.com), (we will require you to prove your identity with 2 pieces of approved identification to progress the request).

## **SHARING PERSONAL DATA**

Capital Index may share information with the Group Companies and Third Parties in the event such information is reasonably required, for a legitimate interest or for legally and/or regulatory purposes.

Capital Index may share information within its Group in order to offer products and services that meet your needs and which are delivered in a manner that is useful and relevant.

Where you have been introduced to us by an Introducer, such an Introducer may have access to your personal information.

Other Third Parties your Personal Data may be shared with may include, but are not limited to:

- an agent, professional advisor or service provider we engage e.g. auditors, accountants, insurance, research and other services such as our counter-party banks, liquidity providers, marketing agencies and IT service providers;
- financial institutions involved in managing our payments, such as banks; and
- regulatory bodies, government agencies, law enforcement bodies and courts.

Capital Index does not sell, license, lease or otherwise disclose personal information to third parties, except as described in this Privacy Statement.

The Company reserves the right to disclose personal information to third parties where required by law, regulatory and other Regulatory Bodies.

All third parties with which Capital Index shares personal information are required to protect such personal information in accordance with all relevant legislation and in a manner similar to the way

Capital Index protects the same. Capital Index will not share personal information with third parties which it considers will not afford its Clients the required level of protection.

## **DATA RETENTION**

Capital Index is legally obligated to keep your Personal Data provided to us, including but not limited to your name, address, email, phone number, your trading and transaction history, deposits and withdrawals history, for at least 7 (seven) years after our relationship with you has terminated.

We will hold your personal data for the longest of the following periods: (a) the period required for the performance of the relevant activity or services, (b) any retention period required by law, (c) the end of the period of any litigation and/or investigation by a public authority which arises in respect of the relevant activity and/or the services, or (d) where the company has justifiable legitimate interest.

Kindly note that data protection terms will be included in the Terms and Conditions for the establishment of a business relationship between us. Any personal data collected will be retained for carrying out the establishment of the business relationship between us.

If we hold any personal information in the form of a recorded communication, by telephone, electronic, in person or otherwise, this information will be held in line with local regulatory requirements which will either be the greater of 7 (seven) years or any period set by any other relevant law, after our relationship with you has terminated.

## **COMPLAINTS**

If you think that we are using your information in a way which breaches data protection law, you have the right to lodge a complaint with your national data protection supervisory authority.

## **COOKIES - PRIVACY POLICY**

A cookie is a small amount of data, which often includes a unique identifier that is sent to your computer, tablet or mobile phone (all referred to here as a "device") web browser from a website's computer and is stored on your device's hard drive. Each website can send its own cookie to your web browser if your browser's preferences allow it. Many websites do this whenever a user visits their website to track online traffic flows. Similar technologies are also often used within emails to understand whether the email has been read or if any links have been clicked.

## a) **FIRST PARTY COOKIES**

Capital Index uses session cookies. A session cookie is temporary and only exists for the period you access the website for (or until the browser is closed after visiting our website). This particular type of cookie assists us by helping our website remember your selections and choices whilst visiting our website and therefore avoids you having to re-enter information. This type of cookie does not contain personal information and cannot be used to identify you.

## b) **THIRD PARTY COOKIES**

A Third Party Cookie is one which is not related to Capital Index and is placed on your device by a third party. Please note that other third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be performance cookies. Such third parties may place cookies on your device but these third party cookies are not controlled by Capital Index and we cannot prevent such third parties placing the cookies on your device. If you are concerned by the use of third party cookies you should contact the websites of such third parties directly and obtain details from them regarding how to opt out of receiving these cookies.

## c) **WHY DOES CAPITAL INDEX USE THESE TECHNOLOGIES?**

Information supplied by cookies can help us to understand the profile of our visitors and help us to provide you with a better experience.

Our website, [www.capitalindex.com/bs/](http://www.capitalindex.com/bs/) web portal, and application form uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and allows us to improve our site.

## d) **WHAT CAN I DO ABOUT COOKIES?**

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies (Such as restricting third party cookies for instance).

However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of the site and the functionality of the site may be impaired.

Except for essential cookies, all cookies will only be retained for a commercially reasonable period.

You can view our full Privacy Policy [here](#)