



Alchemy Markets Limited

Privacy Policy

1 Introduction

Your privacy and trust are important to us and this document explains how Alchemy Markets Ltd and its affiliated companies handle personal data. We may make changes to this Statement from time to time and it is important that you check this Statement for any updates.

2 How we use personal data

We collect, use, disclose, transfer and store personal data when needed to provide our services and for our operational and business purposes as described in this Statement. We want to be clear about our privacy practices, so you can make informed choices about the use of your personal data. You can contact us at any time with questions or concerns.

3 Sharing Your Data

We do not sell any information about you. Only upon your specific request will your information be shared with any related companies. However, in order to meet our legal and regulatory responsibilities we may need to share appropriate information with third parties and partner companies as permitted by law. We only share information that is required for third parties to perform their job. For example, we may disclose information to third parties such as data processing providers and liquidity sources when using them to execute orders. We may also be required to respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include such authorities outside your country of residence.

4 The type of personal information we collect

We currently collect and process the following information:

- Personal identifiers, contacts and characteristics (for example, name, email address and contact details, date of birth, attitude to risk)
- Trading experience, customer financial information, personal and tax identification information
- Website user statistics, record telephone conversations
- Trading, deposit and withdrawal information
- Telephone conversation, emails, letters.

5 How we get the personal information and why we have it

Most of the personal information we process is provided to us directly by you (on systems with parties we have contracts with or by the trading systems you will use) for the following reasons:

- We have a regulatory need to assess whether setting up your account is appropriate.
- We have a regulatory need to record any transactions to meet local and international agreements on the reporting of transactions for the sanctity of the markets and any taxation obligations.
- We have a legal requirement to meet the conditions imposed by successive Anti Money laundering acts along with regulatory requirements.
- We have a regulatory and legal requirement to record any client requested change of terms.
- We have a regulatory requirement to record telephone conversations.

We also receive personal information indirectly, from the following sources in the following scenarios:

- Any adverse press comments are checked on the internet on various software sources.
- A PEPs and Sanctions check is carried out continuously on individual names and daily on corporate names
- Sum&Substance (www.sumsub.com) provide us with client identification support and capture identification documents on our behalf for our use and constantly monitor individuals' details for any PEPs or Sanctions issues that may arise.
- Syntellicore, our electronic application CRM software systems which you upload your initial details onto, that we then use to administer your account.
- Dow Jones are used for checking corporate names for PEPs and Sanctions, and adverse press.
- Trading platforms will be registering and recording your trades, deposits, withdrawals, IP addresses.

Under EU law, the General Data Protection Regulation 2016/679 (the Regulation) and the ePrivacy Directive 2002/58 as amended in 2009 (the ePD), the lawful basis we rely on for processing this information is:

- a) Your consent is not required as it is deemed implicit when entering into the agreement with us that we will be able to use your data for the purposes it was obtained in the first place. This means that if you wish to remove that consent, you will cease to be a client. We will erase your data when we no longer need it to meet potential regulatory, legal or reporting obligations. You can remove that consent at any time by emailing compliance@alchemymarkets.eu
- b) We have a contractual obligation.
- c) We have a legal obligation.
- d) We have a legitimate interest.

We may share this information with our regulator (Malta Financial Services Authority), other Regulatory Authorities or entities we employ from time to time who provide software services to us to enable us to compile requested reports for the aforementioned entities as they require from time to time, and to meet legal or regulatory obligations.

6 How we store your personal information

Your information is securely stored. We keep all the aforementioned items until we no longer have a potential regulatory, legal or reporting requirement to do so. Where personal data is not required, it will be deleted; where it is not required but may be subject to legal proceedings in the future, personal data will be kept pursuant to the appropriate limitation period, namely 6 years. Tax-related data will be kept for 7 years. In each case, such personal data will be archived with restricted access. We will then dispose of your information safely and securely where it is no longer required by erasing your personal information from our records.

We are committed to protecting personal data and implement and maintain appropriate technical and organisational measures to ensure a level of security to protect any personal data provided to us from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data transmitted, stored or otherwise processed. We maintain physical, electronic, and procedural safeguards to protect our clients' personal information and have strict internal policies against unauthorised use or disclosure of client information.

Our clients' information is accessible only to employees who need it to provide services to clients. All our employees are required to follow any data privacy or security policies when handling personal data and are

reminded on a regular basis of their obligations with regard to the confidentiality of client information through employee training and by operating procedures.

7 Your data protection rights.

Under data protection law, you have rights including:

- Your right of access - You have the right to ask us for copies of your personal information.
- Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate.
- You also have the right to ask us to complete information you think is incomplete.
- Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.
- Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- Your right to object to processing - You have the right to object to the processing of your personal information in certain circumstances.
- Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.
- You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

To make a request, please contact us at compliance@alchemymarkets.eu

8 How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us using the above mentioned details.

You can also complain to the IDPC if you are unhappy with how we have used your data.

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