



Privacy Policy

PRIVACY MISSION STATEMENT

Our Mission is:

- To respect the confidentiality of personal information
- To protect individuals' right to privacy
- To maintain confidence and trust in the way we handle personal data by introducing technical and organisational measures in order to protect the security and the confidentiality of the personal data we collect and process.

This Privacy Policy explains how and why we collect, manage, retain and share personal data about you and what measures we take to comply with the Legislation and to keep personal data secure for the period required.

Information About Cresco Capital Markets (UK) Ltd

Cresco Capital Market (UK) Ltd ("CrescoFX", "we"), having its registered address at 21 Arlington Street, London SW1A 1RN, is a Financial Services company authorised and regulated by the Financial Conduct Authority (Firm Reference No.764353).

For any personal data related issues, we are accountable to the Information Commission Office ("ICO").

Individuals we collect Personal Data from

The individuals we collect data from include prospective and existing clients, prospective and current employees, contractors, directors, shareholders and other parties with whom we do business (also referred to in this Policy as "you").

We are committed to safeguarding all the personal information we collect and process, in compliance with the legislation, the General Data Protection Regulation (EU) 2016/679 (GDPR) (the "Legislation").

Personal Data that we collect

CrescoFX collects personal data that is necessary for the performance of our services to you, the improvement of the client experience, for screening purposes that are required by the FCA or for recruitment purposes and HR related matters.

We never request more personal data than we actually need in order to perform the above. Depending on the category into which you may fall (e.g. prospective client or client, employee etc.) we vary our personal data request.

Personal Data we collect includes:

- Name

- Date of Birth
- Email address
- Postal address
- Information on employment status and income
- Nationality
- National insurance number
- Driving licence (copy of Passport, tax number for residents of certain countries)
- Bank account details
- Financial Details
- Investment Experience
- Telephone number
- IP address

To confirm the above information, we ask you for proof of permanent address, including a utility bill, bank statement, a copy of the passport, ID card or a driving licence.

We also collect and store client reports such as trading history and deposit history, and communication between CrescoFX and the client, including emails and telephone calls, for regulatory purposes.

For employees, we collect references, previous employment history, Curriculum Vitae, academic records, bank account details.

Why we collect Personal Data

We collect process and manage your personal data in order to perform our services, rights and obligations set by contract with you; to comply with our legal obligations; to exercise our legitimate interests or upon your consent. Please see below the purposes that we may process your personal data for:

- To determine if you are appropriate for our services and products
- To confirm your identity and to maintain your personal profile;
- To update your profile on your notification;
- To manage your account and to provide you with account support, including updates, notifications, and matters concerning your trading activities and the activities of CrescoFX;
- To provide you with information about your account;
- To provide the products and services for which you signed up;
- To comply with the requirements of the FCA, other Regulators and applicable law;
- To settle enquires, defend legal claims and support regulatory requests
- To contact you when necessary or appropriate in relation to services provided to you;

- To keep you updated whilst you are a client in relation to matters such as your trading activities;
- To detect and prevent fraud, unlawful activity and security issues;
- To provide you with access to our payments services for fund management;
- To manage and administer the products and services provided to you;
- To provide you with information regarding the products and services offered by CrescoFX;
- To assist you in developing an understanding of the products and services that you may be interested in obtaining from CrescoFX;
- To improve our services and the client experience;
- To provide you with information or opportunities that we believe may be relevant to you;
- To create anonymised statistical data;
- To provide you with security alerts;
- To form profiles in relation to your characteristics, preferences and interactions so that we can make automated decisions in relation to our services, marketing and advertisements;
- To analyse your activity for business reporting activities.

Consent

Where your consent is required for processing of your personal data, we always request it before we obtain and process your personal data and we inform you as to the purpose of the processing. You can withdraw your consent at any time. In cases where we might have shared your data with third parties, we will also notify those parties of your decision to withdraw your consent.

How we collect Personal Data

CrescoFX collects and processes personal data from our own website and applications we own, run and manage directly, such as the CrescoFX registration form on our website, from the client MT4 account and from webinars and newsletters for which individuals sign up from time to time. CrescoFX also collects personal data via third parties with whom we do business, such as Introducing Brokers or via third parties' websites through which individuals sign up for CrescoFX products.

When we collect personal data via third parties, we ensure that these parties have asked for your consent before they share your data with us. Subsequently, we always identify ourselves in our first communication to you and state the purpose for which we require the data.

Also, for regulatory purposes, we reserve the right to obtain information on you from other sources such as credit reference agencies or fraud prevention agencies.

How long we keep Personal Data for (Retention of Data)

We do not keep personal data longer than is necessary for the purpose or purposes for which it was collected.

- Clients - we are obliged by the FCA to keep records of our clients for a 5-year term post termination/closure of account, unless we need to retain such data for a longer period (legitimate interest, legal obligation).
- Prospective clients (leads) – currently the company retains data for a maximum term of 2 years post application, provided the prospective client has remained inactive, unless the prospective client expressly requests deletion of their data from our database.
- For prospective employees - currently CrescoFX retains data for 1-year post rejection of the application for a position, unless the prospective employee expressly requests deletion of their data from our database.

We have introduced appropriate technical measures to destroy or to erase from our systems all personal data which is no longer required.

Where you have opted out of receiving marketing communications, we will hold your details on our suppression list so that we know you do not wish to receive communication related to our marketing activities.

Your rights

CrescoFX is required by Legislation to respond to any personal data request within 30 days, unless the type of request requires more time for investigation and assessment. The privacy rights which are applicable in our industry are the following:

- You have access rights; this means that you may request for a copy of your personal information that CrescoFX holds. The initial request is free of charge; however depending on volume and complexity of the matter, we may charge a reasonable administrative fee for subsequent requests.
- You have a right to update your profile, so that the personal data we hold is accurate and up to date. We would subsequently notify any third party with whom we might have shared your personal data, including processors, and ask them to also update their records.
- You may request your personal data to be deleted from our records. In order for us to be compliant with our Regulator, this may not be done instantaneously (Please see section “Retention of Data”). Where deletion is permitted, we will also inform any third parties with

whom we might have shared your personal data and request them to delete your personal data from their records.

- You may request not to be contacted for any marketing related purposes. This can be done via our “unsubscribe button” or via our privacy email address.
- You can object, at any time, to any decisions that we may take that are **purely** based on automated processing (including profiling). Profiling involves the use of technology that helps us make decisions automatically, based on your personal data that we collect from you or from third parties
- You may file a complaint. If you are not satisfied with the way that your complaint was handled by CrescoFX, you can address your complaint to the ICO, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF (Tel 0303 123 1113), accessicoinformation@ico.org.uk

Sharing Personal Data

CrescoFX does not sell personal data to third parties. We may share your personal information with third parties for specific purposes, in relation to the performance of our services, our legal obligations or for public interest purposes. Third parties with whom we may share your personal data are:

- The Financial Conduct Authority or/and (when legitimately required so to do) with other regulatory and government bodies in the UK or other countries.
- Other companies within our group that provide us with IT, administration and other services
- Service providers and specialist advisers who have been contracted to provide us with administrative, financial, insurance, audit, research or other services
- Introducing brokers
- Courts, tribunals and other legal authorities
- Credit reporting or reference agencies
- Credit providers
- Any third party with whom you may authorise us to share your personal data.

Transfers outside the EEA

We may transfer your personal data outside of the European Economic Area (**EEA**). In those cases, we ensure that adequacy rules apply or the third party to whom we transfer the data has provided appropriate safeguards on security and confidentiality in relation to the transfer.

Security

We hold personal information in a combination of secure computer storage facilities in electronic and other means, and we take appropriate technical measures to protect personal information from misuse, loss, unauthorised access, modification or disclosure.

Cookies

Cookies are pieces of information that a website transfers to your hard drive to store and sometimes track information about you. They are stored on your device (laptop, smart-phone, desktop) when you visit a website.

CrescoFX uses cookies to navigate between its web pages efficiently, to personalise content and ads, to provide social media features, to analyse traffic and to improve the user's experience. We may also share information about your use of our site with our social media, advertising and analytics partners. You can find more information about cookies at www.allaboutcookies.org

You have the option of turning this function off via your browser settings. However, this may affect your ability to view parts of the website or to access certain applications.

Personnel Training and Awareness

All CrescoFX staff are trained in handling personal data and confidential information on an on-going basis.

Date into Effect

This Policy is effective as of 25th May 2018 and it may be amended from time to time. You will be notified of any amendments via our website or via email.

Contact Information

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www.crescofx.com