

## **PRIVACY POLICY**

KVB PRIME (UK) LIMITED (hereafter known as “KVB Prime”) takes the security of your information very seriously and this policy relates to the privacy of that information.

Our Privacy Policy will explain the following:

- what information we collect and why we collect it
- how we use that information and how long we keep it;
- your privacy rights;
- how we secure personal information; and
- when this policy applies and other important privacy information.

### **Information that we collect and why we collect it**

When you apply to open, when you maintain an account with us, or request a service we will require you to provide us with information about you. We will need to use the information in certain ways – from basic needs like verifying your identity to more complex things like determining whether financial trading is appropriate for you and processing your requests and transactions.

We collect and retain the following information:

- Biographical data
- Information about payments
- Online information about your visits to our website
- Information received from other sources

### **Why do we collect personal information?**

In order for KVB Prime to meet your needs we require personal information to provide the correct financial service(s). This then allows us to maintain high standards in relation to being a regulated financial company.

### **What kind of personal information do we ask for?**

The type of personal information we may collect can include (but is not limited to): name, address, date of birth, contact details, income, assets and liabilities, account balances, trading statements, tax and financial statements and employment details.

We obtain most of the information directly from our customers through application or other forms, and from maintaining records of information provided in the course of ongoing customer service. We may also obtain information from other sources.

We may ask for other information voluntarily from time to time (for example, through market research, surveys or special offers) to enable us to improve our service.

If you choose not to provide the information we need to fulfil your request for a specific product or service, we may not be able to provide you with the requested product or service.

### **How do we use this information and who may we disclose it to?**

While we may send you marketing material from time to time that we think will be of interest to you, we are conscious of the need to respect your privacy.

Unless you are informed otherwise, the personal information we hold is used for establishing and managing your account and reviewing your ongoing needs, in the light of what might be appropriate for you.

Depending on the product or service concerned and particular restrictions on sensitive information, this means that personal information may be disclosed to:

- any introducing broker with whom we have a mutual relationship (any of whom may be within or outside the European Union and/or the European Economic Area)
- credit providers, courts, tribunals and regulatory or other authorities as agreed or authorised by law
- credit reporting or reference agencies
- anyone authorised by an individual, as specified by that individual or the contract

Generally, we require that organisations outside KVB Prime who handle or obtain personal information as service providers acknowledge the confidentiality of this information, undertake to respect any individual's right to privacy and comply with the Data Protection Principles and this policy.

Third party service providers may keep a record of any searches performed on our behalf and may use the search details to assist other companies in performing their searches.

Please note that third parties are not covered by our privacy policy and are not subject to our privacy standards and procedures.

### **Management of personal information**

We train our employees who handle personal information to respect the confidentiality of customer information and the privacy of individuals. We regard breaches of your privacy very seriously and will impose appropriate penalties, including dismissal.

We have an appointed Privacy Officer to ensure that our management of personal information is in accordance with this statement and the Privacy Act.

### **How do we store personal information?**

Safeguarding the privacy of your information is important to us, whether you interact with us personally, by phone, mail, over the internet or other electronic medium. We hold personal information in a combination of secure computer storage facilities and paper-based files and other records, and take steps to protect the personal information we hold from misuse, loss, unauthorised access, modification or disclosure.

We may need to maintain records for a significant period of time. However, when we consider information is no longer needed, we will remove any details that will identify you or we will securely destroy the records.

### **How do we keep personal information accurate and up-to-date?**

We conduct best endeavours to ensure that the personal information we hold is accurate and up-to-date. We realise that this information changes frequently with changes of address and other personal circumstances. Please help us to keep your information up to date.

### **You have the right to check what personal information about you is held by us**

Under the Data Protection Act, you have the right to obtain a copy of any personal information which we hold about you and to advise us of any perceived inaccuracy.

The Act does set out some exceptions to this. To make a request, please write to us, verifying your identity and specifying what information you require.

We may charge a fee to cover the cost of verifying the application and locating, retrieving, reviewing and copying any material requested. We will acknowledge your request and respond to it within 40 days of receipt of your application and any applicable fee.

### **What if you have a complaint?**

If you consider that any action of ours breaches this Privacy Policy Statement or the Data Protection Principles or otherwise doesn't respect your privacy, you can make a complaint. This will be acted upon promptly. To make a complaint, please contact us by any of the means below.

If you are not satisfied with our response to your complaint, you can telephone the Information Commissioner's Office (ICO) regarding information and enquiries on +44 (0)1625 545 745 or 0303 123 1113.

### **How to contact us**

If you want to make a general enquiry about our privacy policy, change your personal information or simply access your personal information.

email us at:-

[support@kvbprime.co.uk](mailto:support@kvbprime.co.uk) , or write

to us:

The Compliance Manager, KVB PRIME (UK) LIMITED, Alpha Zone, 3a, 1 Portland Street, Manchester M1 3BE

### **Links to third party websites**

This website may have links to external third party websites that may benefit the user. Please note, however, that third party websites are not covered by our privacy policy and these sites are not subject to our privacy standards and procedures.