
This is the Privacy Policy of Livemarkets Limited and describes the main aspects of Global Data Protection Regulation (GDPR) and explains rights and obligations of the clients and Livemarkets Limited, 50 Salisbury Road, TW4-6JQ, London-UK. Company number 09203957. Livemarkets is authorised and regulated by the Financial Conduct Authority FRN: 738538

1. General requirements for data processing

Data processing means: the collection, recording, arrangement, storage, alteration, disclosing, consultation, extraction, use, transmission, cross-use, transferring or granting access to third parties, interconnecting, closure, deletion or destruction of data, or several of the aforementioned operations, regardless of the manner in which they are performed or the means used.

Livemarkets shall compile a list and documentation of means used in data processing and shall keep records of data processing. The list of means used in data processing shall include the name, type and number of the equipment and the name of the manufacturer of the equipment; the name and number of the licence of the software used and the name of the software manufacturer; the location of the documentation of the software used.

Persons engaged in the processing of data shall process data only for authorised purposes under the established conditions and according to the instructions and orders received, and they shall maintain the confidentiality of data which has become known to them in the course of performance of their duties and which are not intended for public use. Such confidentiality requirement continues after termination of the employment or service relationship with Livemarkets.

Unauthorised processing of data (including recording, alteration, deletion, reading, copying, (transmission), unauthorised transportation of records and any other unauthorised use of data (not prescribed by official duties) shall be prohibited.

Adequate security measures, including encryption of data if necessary, shall be implemented upon transmission of data by means of data communication equipment or in the transport of records.

Every user of the database shall be issued personal means of authentication, enabling them to use the database. The access password for electronic databases shall be changed at least once a quarter. The use of any means of automatic entry of passwords shall be prohibited. A user of the data processing system shall not have access to data, which are not required for authorised data processing and the performance of duties of that particular user.

Livemarkets shall implement adequate and sufficient measures to ensure that every data processing operation leaves a trace, which would afterwards enable identification of the person who performed the operation, the nature and time of the operation and any other relevant facts, including when, by whom and which data were recorded, altered or deleted, or when, by whom and which data in the data processing system were accessed, as well as information on any transmissions of data. A possibility for restoring the content of data before modifications shall be available when any modifications are made in data or documents.

Any incomplete or incorrect data known to investigating person or auditor shall be closed and any necessary measures shall be taken promptly to supplement and correct the data in question. Upon a

request of a data subject, Livemarkets shall arrange to correct any incorrect data on the data subject in the database if the data subject notifies Livemarkets or any employee of Livemarkets of the inaccuracy of the data on the data subject and submits correct data; the incorrect data shall be stored with the correct data and with a note indicating in which period the incorrect data were used.

If the accuracy of data is in dispute, the data in questions shall be closed until confirmation of accuracy of the data or determination of correct data. Third persons who provided or received the data shall be promptly notified of any corrections made in data if it is technically feasible and does not lead to disproportionate expenses.

Automatic decisions of the data processing system, without participation of the data subject, shall be permitted only on the conditions and pursuant to procedures specified by law.

2. Legal basis for data collection

The law on data protection sets out a number of different reasons for which a company may collect and process your personal information, these include;

- Consent

In certain situations we collect and process your information with your consent, an example of this is where you have opted into receiving direct marketing from us.

- Contractual Obligations

We sometimes collect information from you to perform our duties under a contract, an example of this would be when you enter into a contract of employment with us.

Another example is when you sign up to an account for one of our services and accept our terms and conditions.

- Legal and Regulatory Compliance

We may process information about you for the investigation of unlawful, fraudulent or any other improper activity connected with our services. Personal information may also be used to report a crime, a suspect crime, including but not limited to money laundering.

3. Rights of the data subject

- Right to Erasure

The data subject shall have the right to withdraw at any time the consent for the processing of personal data, in which case Livemarkets shall cease processing the data to the corresponding extent.

- Right to access

Every person has the right to access data concerning themselves, which are collected in databases, unless this right is restricted by law. Decisions on granting or withholding authorisations for access to data and issuing copies of data shall be made by Livemarkets.

Upon request of the data subject, Livemarkets shall notify the data subject of the data, which is available on the data subject in the database, and the sources of such data, the purpose of data processing and any third parties or categories of third parties that have received authorisation for data transmission, as well as any other facts of which the owner (processor) of the database is required to notify the data subject, unless the right of the data subject to receive information is restricted by law. The data shall be issued by using the method requested by the data subject, if possible, within five business days from the receipt of the respective request.

- **Right to Rectification**

You have the right to have inaccurate personal information rectified. If you cannot amend any inaccuracies yourself through your on-line account for example, your request will be looked at and where we can we will update any inaccuracies, if however, we take the decision not to make a change you have requested, we will explain this to you in writing.

- **Right to object to processing**

The data subject, as permitted by law, may request that Livemarkets stop processing its personal information. Your request will be looked at and where we can comply with the request we will and for the duration of the restriction time scale you have indicated, if however, we take the decision not to comply with the request, we will explain this to you in writing.

- **Right to Withdraw consent**

Where the data subject have provided us with prior consent to the processing of his or her personal data, he or she may, as permitted by law, to withdraw the consent and any time. Such withdrawal will not affect our processing of the personal information under any other basis of processing (E.g. processing the information for providing the subject with services and products).

In the cases specified by law, data shall be released to third parties with a statutory right to request and receive such data. In all other cases, data shall be released to third parties only if the data subject has granted a respective consent.

Authorised persons may review, on site, the documents on the establishment of databases and any other documents pertaining to the databases.

- **Contacting our Data Protection Officer**

If you have any questions about how we handle your personal information, have a question about this Privacy Notice or would like to submit a subject access request or a request to exercise any of your rights, you can contact us in the following way:

By email: compliance@livemarkets.com

OR

The Data Protection Officer. Livemarkets Limited, 50 Salisbury Road, TW4 6JQ, UK

- **Right to lodge a complaint with the supervisory authority**

We suggest that you contact us about any questions or if you have a complaint in relation to how we process your personal information. However, you do have the right to contact the relevant supervisory authority directly. To contact the Information Commissioner's Office in the United Kingdom, please visit the ICO website (<https://ico.org.uk/concerns/>) for instructions.

3. Data collected in databases

Livemarkets may collect in databases any publicly available data or any data voluntarily submitted by data subjects. Only data necessary for the provision of service to the clients and/or for the performance of operations requested by the clients may be requested from the clients.

Livemarkets shall collect and process the clients' data to the extent, which is necessary for the achievement of specified objectives (provision of services), and in a manner, which is designed for the specific purpose. Unnecessary data shall be deleted or destroyed at once. Use of data in any other manner than previously agreed is permitted only with a respective consent of the data subject or on the conditions specified by law.

The managers and employees of Livemarkets shall register and preserve the data and documents associated with the provision of services, including:

a) Documents, which specify the rights and obligations of Livemarkets and the clients, or the conditions of provision of service by Livemarkets to the clients;

b) Details of provided services and transactions and any communications between the clients and Livemarkets to the extent, which ensures an overview of the actions of Livemarkets the provision of services.

Livemarkets shall register and preserve the data on the decisions pertaining to the business and management of the firm, and preserve the internal procedure rules of the firm. Livemarkets shall keep records of the documents of Livemarkets and shall organize preservation and archival of such documents on the conditions and pursuant to procedures specified by law and internal procedure rules (including periods of preservation). Livemarkets shall preserve data for at least five years, unless other terms for the preservation of data or documents are prescribed by law, instruments of the Financial Conduct Authority or any other regulator of the parent firm, Trendbird GmbH, the internal policies and procedures of the firm or the decisions of the Board of Livemarkets. Client agreements and/or conditions of the provision of service by Livemarkets to the clients shall be preserved for at least as long as the contractual or other legal relationship connected to the provision of investment services or ancillary investment services to the client continues, unless a longer term is specified by law. In the UK this is for five (5) years after conclusion of services provided to the client.