

Privacy Policy

Effective Date: 21st September 2021

GMO-Z.com Trade UK Limited (hereinafter referred to as "Company", "we", "our" and "us") collects certain information about you. When we do so, we are subject to applicable data protection law and we are responsible as 'controller' of that personal information for the purposes of those laws.

1. Contact details

If you have any questions about this privacy policy or our privacy practices, please contact us in the following ways:

Full name of legal entity: GMO-Z.com Trade UK Limited

Email address: info.globalmarkets@z.com

Postal address: 8 Devonshire Square, London, United Kingdom, EC2M 4PL.

2. The data we collect about you.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, title, gender, date of birth, nationality and country of residence.
- **Contact Data** includes address email address and telephone numbers.
- **Employment Data** includes position at the company.
- **Shareholder Data** includes information about shareholding.
- **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Usage Data** includes information about how you use our website and services.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data

This personal data is required to provide services to you or to our clients. If you do not provide personal data we ask for, it may delay or prevent us from providing such services.

3. How we collect data

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact Data and Employment Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply for our services; and
 - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our [cookie policy](#) for further details.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:
 - Technical Data from analytics providers such as Google and others based outside the UK;
 - Identity, Contact, Employment and Shareholder Data from publicly available sources such as Companies House and the Electoral Register based inside the UK, or equivalent data registers outside the UK.
 - Identity, Contact, Employment and Shareholder Data from our clients or prospective clients.

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data, however, if we do ask for your consent then you have the right to withdraw consent at any time by contacting us.

5. Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To set up an account	(a) Identity (b) Contact (c) Employment (d) Shareholder	(a) Performance of a contract with you (b) Necessary for our legitimate interests (so that we can provide services to our clients) (c) Necessary to comply with a legal obligation
To manage our relationship with you or our clients which will include notifying you about changes to our terms or privacy policy	(a) Identity (b) Contact (c) Employment	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how clients use our services)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content to you and measure or	(a) Identity (b) Contact	Necessary for our legitimate interests (to study how clients use our services,

understand the effectiveness of the advertising we serve to you	(c) Usage (d) Technical	to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, services, marketing, client relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of clients for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Employment	Necessary for our legitimate interests (to develop our services and grow our business)

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

6. Your rights

You have the following rights in relation to your personal data:

Access	The right to be provided with a copy of your personal information (the right of access)
Rectification	The right to require us to correct any mistakes in your personal information
To be forgotten	The right to require us to delete your personal information—in certain situations
Restriction of processing	The right to require us to restrict processing of your personal information—in certain circumstances, e.g., if you contest the accuracy of the data

Data portability	The right to receive the personal information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object	The right to object: —at any time to your personal information being processed for direct marketing (including profiling); —in certain other situations to our continued processing of your personal information, e.g., processing carried out for the purpose of our legitimate interests.
Not to be subject to automated individual decision making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

7. Disclosure of your personal data

Depending on the circumstances and the specific data concerned we may disclose your information to:

- other GMO Internet Group companies who provide financial services;
- other third parties we use to help us run our business, e.g., marketing agencies or website hosts;
- identity checking and credit reference agencies;
- our insurers and brokers; and
- our bank/s.

We only allow our service providers to handle your personal information if we are satisfied that they take appropriate measures to protect your personal information. We also impose contractual obligations

on service providers relating to ensure they can only use your personal information to provide services to us and to you. We may also share personal information with external auditors, e.g., in relation to the audit of our accounts.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some personal information with other parties, such as potential buyers of some or all of our business or during a re-structuring. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

8. Transfer of Personal Data

Personal data is transferred to our group companies and outsourcing contractors such as identity checking and reference agencies located in the UK and other countries and regions. Whenever we transfer your personal data out of the EEA or the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- we will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data; or
- where we use certain service providers, we may use specific contracts approved for use in the UK or the EU (depending on where the data is transferred from) which give personal data the same protection it has in the UK or the EU (as the case may be).

For further information regarding international data transfers, please contact us using the contact details above.

9. Safeguards

In order to appropriately manage the personal data of clients and other subjects concerned and prevent leakage, loss and damage of data, including other safety management approaches, we put in place technical, physical, organizational and human related safeguards.

10. Archiving, Deletion, Disposal of personal data

We will keep your personal information while you have an account with us or we are providing services to you or your employer. Thereafter, we will keep your personal information for as long as is necessary:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to show that we treated you fairly; and
- to keep records required by law.

We will not retain your personal information for longer than necessary for the purposes set out in this policy.

When it is no longer necessary to retain your personal information, we will delete or anonymise it.

11. Enquiries

For inquiries regarding this privacy policy, please make contact to the following contact point:
URL: <https://secure.gmo.jp/en/gdprform/> or contact us using the contact details set out above.

12. About Cookies and Other Similar Technologies.

We use cookies on this website with a view to increasing the usability. When you re-visit this website cookies are used for user tracking, re-targeting advertisement, affiliate advertising and retaining login information of registered users, users can view this site more conveniently.

A cookie is an information used to transmit information from this site to your browser. When you, as a client or other visitor, visit this site again, the cookie helps you to use this site more conveniently and is stored in your personal computers/devices.

Furthermore, the stored information does not include information such as your name, your residential address, your phone number and your email address which can be used to identify an individual.

Cookie information that is collected from clients and other visitors will be transmitted to and stored in servers at Google LLC and some other entities from our web servers.

We also obtain statistical data concerning access information such as the number of accesses and stay period for this site from stored data by using Google Analytics service and some other services.

It is possible to block cookies, if you, as a client or other visitor, change the setting of your web-browser. In such cases, you will not have a trouble viewing this site except for some functions. Please make contact with the developer and/or distributor of the web-browser that you are using for its setting procedure.

For further information about how we use cookies, please refer to our [cookie policy](#).

13. Language of Communications

All GMO-Z.com Trade UK Limited legal documents are available in English, and can be found on the English version of our corporate website. Translations into other languages are provided for reference purposes only. For the avoidance of doubt, the English version shall prevail in the event of any inconsistencies or ambiguities.