# **Privacy Policy**

#### Introduction

Global Market Index Limited ('The company", "GMI", "we", "us", "our", "ours" or "ourselves as appropriate), is committed to protecting your personal data. This Policy sets out the basis on which we collect, process and use your personal data when deal with you, including when you visit our Website and use our services.

Your privacy is important to us and it is our policy to respect the confidentiality of information and the privacy of individuals. This Privacy Policy will provide you with information on how we collect and process your personal data through the use of our Website or services.

#### Data We May Collect About You

Personal data, personal information or personally identifiable information (PII), means any information relating to an identifiable person. We may collect, use, and store your personal data about you which we have grouped together follows:

**Identity Data:** This includes your name, email address, home address, date of birth, copies of your identity documents (including photo ID), email address, telephone number and mobile number, financial status, statements, and proof of address documentation.

**Financial Data:** This include data relating to your means and methods of payment, such as your bank account and payment card details.

**Transaction Data:** This includes data relating to the transactions you have carried out with us, such as details about deposit and withdrawal transactions.

**Telephone Recordings Data:** if you contact us by telephone we may monitor and/or record your conversations with us and retain the recordings for such periods as may be necessary or required by law.

**Technical Data:** This includes more technical data that we may obtain when you make use of our Website, such as your internet protocol (IP) address, your login data, 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 our Website.

**Profile Data:** This includes the data that we receive when you create an account on our Website and make use of that Policy, such as your username and password.

**General Data:** This includes information about your source of wealth, current occupation, knowledge and trading experience information.

Marketing and Communications Data: such as your preferences in receiving marketing from us and our third parties, and records of correspondence you have entered into with us via email, live chat, post or telephone.

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. We may also collect data for legal entities verification purposes. This includes constitutional documents like certificate of incorporation, memorandum of association, articles of association, annual returns, corporate structure, list of company's directors and officers, trustee deed, partnership agreement or individuals dealing with us on a "one-off" basis.

#### How We Use Your Personal Data

We will only use your personal data when the law allows us to. We collect, use, disclose, transfer and store personal data when needed to provide you with our services and for our operational, legal, regulatory and business purposes in relation to those services and as described in this Policy. We may use your personal information for the following most commonly purposes:

#### Create a trading account and provide you with our services

- Verify your Identity, we conduct ongoing checks on our clients including anti-money laundering, sanctions, fraud, credit risk and customer due diligence checks which we are required to complete, which may be done by our third-party service providers. We may use and retain this data even after you have closed your account.
- Improve our products and services, which may be of interest to you.
- Securing our Website and services, including preventing and detecting any security breaches, fraud or other criminal or malicious activities.
- Notify you about any changes to our services and offering, including our terms and conditions and Privacy Policy.
- Use data analytics to improve our services and customer experience
- Comply with any other applicable law or regulation
- **Promotional Offers from Us:** You may receive marketing communications from us if you have requested information from us or opened an account with us and you have not opted out of receiving such communication. We may use personal data to form a view on what may be of interest to you.

#### **Disclosure of Your Personal Data**

We may share or disclose your personal information with the following parties. When we share personal data, we do so in accordance with applicable data privacy laws and our internal security standards.

• Service Providers (individual/entities) including consultants or contractors who provide IT, finance, human resources and system administration services.

- Professional advisers including lawyers, bankers and auditors providing consultancy, banking, legal and accounting services.
- Regulators, HMRC, and other authorities based in the United Kingdom, who require reporting of processing activities in certain circumstances.

# This may include sharing your personal data with international service providers which will involve transferring your data outside the European Economic Area ("EEA").

We ensure your personal data is protected to the same or similar degree if protection as we do internally by requiring all our service providers, consultants and contractors to follow the same rules when processing your personal data as set out in this Policy.

## **Data Security**

We are committed to ensuring that your information is secure. In order to prevent unauthorized accessor disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online. For example, we will use the following types of measures, where appropriate: (a) encryption of personal information, (b) back-up servers, and (c) ongoing monitoring of the effectiveness of security measures.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

# Cookies

"Cookies" are files with a small amount of data that are commonly used as anonymous unique identifiers. These are sent to your browser when you visit the websites and are stored on your device's internal memory.

Under applicable law, we may store cookies on your device only if they are strictly necessary for the operation of this website. For all other types of cookies, your explicit consent is required. Currently, our Website uses strictly necessary, functional, analytics and marketing cookies placed through third-party services and technologies to provide you with a more relevant, personalized and effective experience, analyze website traffic and improve functionality.

To learn more about the cookies we collect, you can follow this link.

# **Third-Party Services**

We use third-party analytics providers and technologies to collect information about the use of this website, such as:

 Google Analytics is a web analytics service offered by Google that tracks and reports website traffic, monitor the use of our Website. Google Analytics may collect certain information when you use our Website, including your IP address, device type, browser details, approximate geolocation, and other session statistics. This data is processed through default Google Analytics cookies (e.g. to distinguish users and sessions, to limit request rates). Google Analytics anonymizes the IP address before it is stored. We do not receive the non-anonymized IP address. To learn more about how Google collects and uses data, see its Privacy and Terms.

- Cookiebot CMP enables organizations display a cookie consent banner on websites to achieve data
  privacy compliance with global regulations. When You submit a consent to the cookies on our
  Website, the following data is automatically logged at Cookiebot, the company behind Cookiebot:
  user's IP number in anonymized form, the date and time of the consent, user agent of the user's
  browser, the URL from which the consent was submitted, an anonymous, random and encrypted key
  value, the user's consent state, serving as proof of consent. To learn more about how Cookiebot
  collects and uses data, see What information does Cookiebot collect and log about the user'
  consents.
- HubSpot, Inc. enables organizations to use Live Chat, so users can clarify product questions with GMI agent in real time in the widget on our Website. HubSpot cookies on our Website for Live Chat serve the following purposes: Live Chat Functionality – help to enable and track interactions, allowing a seamless chat experience; user tracking – help to identify returning users and personalize chat interactions; session management - maintain chat continuity across different pages; analytics - track chat usage and performance to improve service; personalization - allow the chat to be tailored to the user's past interactions. To learn more about how HubSpot collects and uses data, see <u>Cookies set</u> in your browser by HubSpot.

**Right to Opt-Out / Do Not Track**: You have the right to opt out of having your activity on the website shared with us in the following ways:

- By setting up a Do Not Track (DNT) browser control that signals your preference to have us not process your information. We respect your DNT preference by detecting your browser's DNT setting and automatically refraining from collecting any cookies except those strictly necessary, where applicable. Therefore, if you wish to prevent us from collecting your data, you can do so by following the instructions below depending on your browser (please note, that You will need to take this action for all browsers that you use where you do not want us to collect your data, but DNT setting might not work in all browsers and may be impacted by future browser updates): Google Chrome, Safari, Opera.
- By downloading <u>Google Analytics Opt-out Browser Add-on</u> You can opt out specifically from Google Analytics data collection.
- By managing and updating your cookie settings on our Website, following the link to see the list of cookies we collect and re-select your cookie preference.

#### **Data Retention**

We will only retain your personal data for as long as necessary to fulfil the purposes for which we collected it and, thereafter:

- For the purpose of satisfying any legal, accounting, tax, anti-money laundering and regulatory obligations or reporting requirements to which we may be subject; and/or
- To the extent that we may also need to retain your personal data to be able to assert, exercise or defend possible future legal claims against you or that otherwise involve you.

All in all, our retention of your personal data shall not exceed the period of (7) seven years from the termination of your customer relationship with us, (which would typically arise from the closure or

termination of your customer account); or from the date your account becomes Inactive, which would typically arise from not using the account for the period of 2 (two) years and its balance is Zero. This retention period enables us to make use your personal data for any applicable AML retention and reporting obligations, and for the filing, exercise or defence of possible future legal claims. There may also be instances where the need to retain personal data for longer periods, as dictated by the nature of the products and services provided.

## Your Rights of Access to Your Personal Data

Subject to certain legal conditions, you have certain rights in relation to your personal data. All customers of GMI have the right to ask us not to process their personal data for marketing purposes. We will usually inform you before collecting your data if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by not accepting such notifications. You can also exercise the right at any time by contacting us at Compliance@gmimarkets.co.uk.

In addition, all European Economic Area (EEA) customers, are legally entitled to certain additional rights including the below:

- Access to personal information: You have the right to ask us for copies of the personal information we hold on you and information regarding our processing activities. Before providing you with access, we may ask you to provide evidence of your identity and we may be unable to disclose some of the information for legal or regulatory reasons. You can request us to provide the information to you by contacting us Compliance@gmimarkets.co.uk
- Right to rectification: You have the right to ask us to correct or amend your personal information if it is inaccurate, requires updating, or is incomplete. We may ask you for additional evidence to process your request.
- Right to be forgotten: You also have the right to request us to delete your personal information unless we are required to hold it for legal or regulatory reasons or our own internal compliance requirements.
- Right to Object to processing and restrict processing: you have the right to request that we no longer process your personal data for particular purposes, or to object to our processing of your personal data for particular purposes.
- Right to Data portability: you have the right to request us to provide you, or a third party, with a copy of your personal data in a structured, commonly used machine- readable format.

By consenting to this Privacy Policy, you are giving us permission to process your personal data for the purposes identified.

Should you require any further details regarding our treatment of personal data, please contact us <u>Compliance@gmimarkets.co.uk</u>

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 may refuse to comply with your request in these circumstances.

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.

We will respond to any requests referenced above within twenty-eight (28) days of receipt. If we require more information from you, or if your request is unusually complicated, we may require more time and will inform you accordingly. We will not usually charge you a fee for a request. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive.

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK's supervisory authority for data protection issues (www.ico.org.uk). Please contact us first if you do have a complaint so that we can try to resolve it for you.

#### Your duty to tell us about of changes

It is important that the data we hold about you is accurate and up to date. If you believe that any information, we are holding on you is incorrect or incomplete, please write to us and keep us informed if any data changes during your relationship with us by emailing Compliance@gmimarkets.co.uk

#### **Changes to Our Privacy Policy**

Any changes we may make to our Privacy Policy in the future will be posted on our Website. This Policy was last updated in May 2025. Please check our Website frequently to see any updates or changes to our Privacy Policy. If we make changes which are significant, we will provide a prominent notice or notify you through other means.

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