



Finance Managers International Limited Privacy Policy



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Privacy Policy

Finance Managers International Limited trading as UBFX (“UBFX”, “we”, “us”, “our”) is subject to data protection legislation in the United Kingdom (UK). We are therefore committed to protecting your privacy and maintaining the security of any personal information that we receive from you. If this Policy changes, we will place an updated version on this page.

The purpose of this policy is to explain to you what personal information we collect and how we and our associated companies may use it. We take client privacy very seriously and train our staff on their privacy obligations.

Who we are

Finance Managers International Limited trading as UBFX is a private limited company registered company in the UK under registration number 11038677 and is an appointed representative of TigerWit Limited which is authorised and regulated in the UK by the Financial Conduct Authority (FCA) under registration number 679941. Our registered address is 288 Bishopsgate, London EC2M 4QP. We provide online trading for customers who wish to trade over the counter derivative products such as CFDs and Forex.

This Privacy Policy along with the Privacy Notice details how we collect and process personal data, how you can request access to your data, and what you can then do with it or instruct us to do with it.

How we obtain your information

We receive or collect personal information about you through your registration and application, and any subsequent emails, letters, telephone calls and conversations made in the course of our relationship with you. In accordance with UK data protection legislation this information is securely stored to prevent unauthorised access.

How we check your identity

To comply with money laundering regulations we have a legal obligation to confirm that certain aspects of the information that you have supplied are true and correct. This process is commonly called “Know Your Client” or “KYC”. We will ask you to submit personal information through the application form, and the application process will involve electronic verification of such data via commercially available third party sources, such as a credit reference company. Our search is not seen or used by lenders to assess your ability to obtain credit.

Due to CFTC regulatory restrictions and in accordance with the Dodd-Frank Act, FINANCE MANAGERS INTERNATIONAL LIMITED AND THEIR PRINCIPAL — TIGERWIT LIMITED — CANNOT OPEN ACCOUNTS FOR RETAIL CUSTOMERS WITH RESIDENCE IN THE UNITED STATES*.

*A United States resident means any of the following: any natural person resident of the United States; any company, partnership, or other legal entity created or organised under the laws of any jurisdiction of the United States; a branch or agency of a foreign entity located in the United States; a trust of which the trustee is a United States resident; an estate of which a United States resident is the executor or administrator; or any account held for the benefit of a United States resident.

Where we are unable to verify your identity to the standards required by us we may ask you to send us copies/scans of documentation such as a passport or utility bill.

Using your information

We may process your information for one or more lawful bases of processing depending on the purpose for which we use your data. For example, we may send you marketing material from time to time by email, telephone, SMS or other electronic messaging services on the basis that you have given us consent or if it is in our legitimate interest to do so. If you do not wish to receive marketing information from us you will be able to opt out electronically at any time.

Your personal information may be disclosed to:

- service providers who have been contracted to provide us with IT, financial, administrative, regulatory, compliance, or other services
- our principal firm, TigerWit Limited
- introducing brokers with whom we have a mutual relationship
- courts, tribunals and regulatory authorities as authorised by law
- credit reporting or reference agencies
- anyone authorised by you to receive such information such as Money Manager

Generally we require that external organisations who handle or obtain personal information acknowledge the confidentiality of this information, undertake to respect any individual's right to privacy, and comply with all the relevant data protection laws applicable to them. Please note that the use of your personal information by external third parties who act as data controllers of your personal information is not covered by this privacy notice and is not subject to our privacy standards and procedures.

We may transfer your personal information outside the European Economic Area to processors who are engaged on our behalf.

Joint Accounts

Where you have applied for an account with a third party (i.e. a joint account) your information may be visible to those third parties.

How we store your personal information and for how long

We take very seriously the safeguarding and privacy of your personal information, whether you interact with us

personally, by phone, by mail, over the internet or any 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.

When we consider that personal information is no longer needed, we will remove any details that will identify you or we will securely destroy the records. However, there are some legal and regulatory obligations that we must adhere to which means that we need to maintain some records for a significant period of time. For example, we are subject to certain anti-money laundering laws which require us to retain copies of the documents we used to comply with our customer due diligence obligations and supporting evidence and records of transactions with you and your relationship with us for a period of up to seven years after our business relationship with you has ended. Any personal information in the form of a recorded communication, by telephone, electronic, in person or otherwise, will be held in line with local regulatory requirements, currently for up to seven years after our business relationship with you has ended. 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 want to receive these communications.

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 where necessary.

If UBFX is involved in an acquisition or restructuring, your information may be shared with the acquiring/acquired entity if it is in our legitimate interest to do so or if we are provided to comply with any legal obligation to do so.

Transaction Activity

Your trading activity remains the property of our principal firm, TigerWit Ltd, and may be used by them where they have a legitimate interest to do so or to comply with any legal or regulatory obligations they may have. Where your trading activity is revealed to third parties your actual identity will remain private.

Prevention of terrorism and crime

Where we are required by law, your personal information may also be disclosed to an applicable governmental, regulatory or enforcement authority. These authorities may then use your personal information to investigate and act on any breach of law or regulatory rules in accordance with their procedures. Whilst we can advise such authorities as to

their privacy obligation we cannot control their use of your data.

We record all phone calls

With you in case we need to check we have carried out your instructions correctly, to resolve queries or disputes, for regulatory purposes, to help improve our quality of service, and to help detect or prevent fraud or other crimes. Conversations may also be monitored for staff training purposes.

You may obtain a copy of all the personal information that we hold on you by making a Subject Access Request

Normally we will respond to your request within one month and no fee will apply. However, if the request is manifestly unfounded or excessive, or repetitive in its nature, we may either extend the time to respond and/or charge a reasonable fee or refuse to deal with the request. Your rights in relation to your personal data are outlined in our Privacy Notice.

What is a Cookie and how do we use them?

Cookies are small pieces of text stored on your computer or mobile device when you visit a website or app. Cookies help us determine the type of browser and settings you are using, where you have been on the website or in the app, when you return to the website or app, and to ensure your information is secure. The purpose of this information is to provide you with a more relevant and effective experience, including presenting relevant content according to your needs or preferences. We may also use independent external service providers to track the traffic and usage on the website. See our Cookie Policy for more information.

Information on deleting or controlling cookies is available at www.AboutCookies.org.

However, you should be aware that you may not be able to access some parts of our site or app if you choose to disable the cookie acceptance in your browser, particularly the secure parts of the site. We therefore recommend you enable cookie acceptance to benefit from all of our services.

If you have any questions or complaints about privacy, please contact our Compliance department at:

Compliance Department
Finance Managers International Limited trading as UBFX
288 Bishopsgate
London
EC2M 4QP

If you are not satisfied with our response to a complaint, you have the right to lodge a complaint with the Information Commissioner's Office (ICO). You can find details about how to do this on the ICO website at <https://ico.org.uk/concerns/> or by calling their helpline on 0303 123 1113.

PRIVACY NOTICE

This Privacy Notice is created for your benefit in conjunction with our Privacy Policy.

- How do we use your information?
- Right to be Informed

We may use your information for the following purposes:

To verify your identity and manage your account.

When you apply for an account with us we need to verify your identity using the information that you give us, and we also use that information so that we can effectively manage your account. We may use third parties to help us verify your identity. Not only do we have a legal obligation to use the information that you provide to comply with 'Know Your Client' regulations, but it is also in our legitimate interest to do so.

To provide products and services and review your ongoing needs.

Once you register for an app or open a demo or real account with us, we need to use your personal information to provide you with the service you have requested and comply with our obligations to you. We do this to comply with our contractual obligations to you, and also as it is also in our legitimate interest to review your needs from time to time to ensure that you are getting the benefits of the best products and services from us.

To assist us in the development and marketing of our products and services.

We may use personal information about you through your use of our service to help us improve our service. It is in our legitimate interest to use your data in this way to further develop our service and ensure that we continually meet your expectations.

To assist in the investigation of any dispute between you and us or, where relevant, for the purpose of investigating a dispute with a third party.

We may need to use your personal information to investigate disputes between you and us or between a third party and us. We do this to comply with our contractual obligations and also as it is in our legitimate interest to ensure that any disputes are resolved in a quick and efficient manner.

To comply with any applicable law, court order, or judicial process, or to fulfil our legal obligations toward any regulatory authority with jurisdiction over us.

We may need to use your personal information to comply with any applicable law, court order or judicial process, or to fulfil our legal obligations toward any regulatory authority with jurisdiction over us. We do this to comply with our legal obligations and also because it may be in our legitimate interest to do so.

To form a profile about you.

We may use your personal data to form a profile about you so that we can better understand you and provide you with the best service that we can because it may be in our legitimate interest to do so.

For Data Analysis purposes.

Our Web pages and e-mails may contain web beacons or pixel tags or any other similar type of data analysis tools which allow us to track receipt of correspondence and to count the number of users that have visited our webpage or opened our correspondence. Where your personal information is completely anonymised, we do not require a lawful basis as the information will no longer constitute personal information. However, where your personal information is not in an anonymised form, it is in our legitimate interest to continually evaluate that personal information to ensure that the products and services we provide are relevant to you.

To provide references about you.

From time to time third parties such as credit agencies may approach us and request information about you to perform credit and identity checks. We may have a legal obligation to comply or it may be in our legitimate interest to do so. However, if we are unsure in regards to providing this information we will speak to you first.

To assist in our marketing to you.

We may use your personal information to send you marketing communications by phone, email, or other agreed forms (including social media campaigns) to ensure you are kept up to date with our services. We will send you marketing communications as it is in our legitimate interest to do so or with your consent.

Internal business purposes and record keeping.

We may use your personal information for internal business purposes and record keeping purposes. Such processing is necessary to comply with our legal obligations and is in our legitimate interest to do so.

Corporate Restructuring.

If we undergo a corporate restructure or part of our business is acquired by a third party, we may need to use your personal information in association with that restructure or acquisition. Such use may include using your details as part of a due diligence exercise. It is in our legitimate interest to use your information in this way provided we comply with any legal obligation we have to you.

Security.

Should you visit our premises we may take an image of you via CCTV. We do this as it is in our legitimate interest to ensure a safe working environment.

How long do we retain personal information for?

Your personal data will not be kept for longer than is necessary for the purposes for which it was collected and processed and for the purposes of satisfying any legal, accounting or reporting requirements.

The criteria we use for retaining your personal data, includes the following:

- General queries and correspondence – when you make an enquiry or contact us by email or telephone, we will retain your information for as long as necessary to respond to your queries. After this period, we will not hold your personal data for longer than 7 years if we have not had any active subsequent contact with you.
- Direct marketing – where we hold your personal data on our database for direct marketing purposes, we will retain your data for no longer than 7 years if we have not had any active subsequent contact with you.
- Legal and regulatory requirements – we may need to retain personal data for up to 7 years where necessary to comply with our legal obligations, resolve disputes or enforce our terms and conditions.

Your Rights in relation to your personal data.

Information about any rights that are available to you in relation to the personal information that we hold about you is set out below:

Right of Access

Upon request we will confirm whether we are processing your personal information and supply you with an electronic copy of the personal information held by us. This is called a Subject Access Request (SAR).

Right of Rectification

If the personal information we hold about you is inaccurate or incomplete, you are entitled to have it corrected. If we have shared your information with a third party we will let them know about the rectification where possible. If you ask us, where possible and lawful to do so, we will also tell you who we have shared your information with so that you can contact them directly.

Right to be Forgotten (Erasure)

You can ask us to delete or remove your personal information in certain circumstances such as where we no longer need it or you withdraw your consent (where applicable) provided that we have no legal obligation to retain that data. Such request will be subject to any retention limits we are required to comply with in accordance with applicable laws and regulations. If we have shared your personal information with others, we will let them know about the erasure where possible. If you ask us, where possible and lawful to do so, we will also tell you who we have shared your personal information with so that you can contact them directly.

Right to Restrict Processing

You can ask us to stop processing your personal information in certain circumstances and we will do so within the boundaries permitted by our legal and regulatory obligations. We will continue to store your personal information though. We will tell you before we lift any restriction. If we have shared your personal information with others, we will let them know about the restriction where possible. If you ask us, where possible and lawful to do so, we will also tell you who we have shared your personal information with so that you can contact them directly.

The Right to Data Portability

The General Data Protection Regulations (GDPR 679/2016) give you the right to obtain the personal information you have provided us with in a structured, commonly used, machine readable format, and to reuse it elsewhere or ask us to transfer it to a third party of your choice.

Right to Object

You may ask us to stop processing your personal information when we are:

- Relying on a legitimate interest to process the data unless we can demonstrate compelling legal grounds to do so,
- Processing your personal information for direct marketing purposes,
- Processing data for research unless such processing is necessary for the performance of a task carried out in the public interest.

Automated decision making and profiling

If we have made a decision about you based solely on an automated process (e.g. through automatic profiling) that affects your ability to use the services or has another significant effect on you, you can ask to not to be subject to such a decision unless we can demonstrate to you that such decision is necessary for entering into, or the performance of, a contract between you and us. Even where a decision is necessary for entering into or performing a contract, you may contest the decision and require human intervention.

Making a Subject Access Request (SAR)

If you wish to make a SAR you should contact us by email with details of the information that you are requesting. We kindly request that when contacting us you provide a brief description of the data that you require or an explanation of which right you wish to exercise.

However, if your requests are manifestly unfounded or excessive, in particular because of their repetitive character, we may either: (a) charge a reasonable fee taking into account the administrative costs of providing the information or taking the action requested; or (b) refuse to act on the request.

We may require proof of identity before we start to process your request.

Your duty to inform us of changes.

Please ensure that when any of your personal details change, such as your telephone number, you notify us immediately so that the data we hold about you is accurate and up to date.