

# Privacy Policy

Hamilton Court Foreign Exchange Limited and its subsidiaries (collectively, “HCFX”, “we”, “us” “our”) respect and safeguard your right to privacy. Our subsidiaries are Hamilton Court FX SIM S.p.A and Hamilton Court FX Payments S.r.l., both registered in Italy.

This Policy sets out how and why information may be collected from this website and provides you with other information which we are required to comply under the Data Protection Act 2018 and the General Data Protection Regulation (EU) 2016/679 (collectively, “GDPR”). This Policy applies to all visitors of our website.

## 1. Our Contact details

HCFX is the Data Controller which means we decide the purposes and means of the processing of that personal information. We are registered with Information Commissioners Office (ICO) with registration number ZA469532. If you have any concerns about our use of your personal information, you can make a complain to us by contacting our Data Privacy Officers at:

For UK: [compliance@hamiltoncourtfx.com](mailto:compliance@hamiltoncourtfx.com)

For Italy: [italia@hamiltoncourtfx.com](mailto:italia@hamiltoncourtfx.com)

You can also complain to the ICO at the following contact details:

Country	United Kingdom	Italy
Address	Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF	Piazza Venezia 11 - 00187 Roma (Italy)
Telephone	0303 123 1113	+39 06.69677.2917 (Monday to Friday, 10 to 12:30)
Electronic address	<a href="https://ico.org.uk/make-a-complaint/data-protection-complaints/data-protection-complaints/">https://ico.org.uk/make-a-complaint/data-protection-complaints/data-protection-complaints/</a>	<a href="mailto:urp@gpdp.it">urp@gpdp.it</a>

## 2. What information we collect and why we collect it

We will collect and process data entered into this website, including in our application form. Where personal data are collected, this Policy described details on why we need your personal data and how it will be used.

In all cases where personal data is collected about you, this is carried out with your consent, and you will be required to provide consent for us to collect and process your data, and for us to enter into a contract with you.

Most of the personal data we process are for the following reasons:

- For regulatory reasons, HCFX is required to collect Know Your Customer information which will include your full name, address and date of birth.
- In order to fulfil our contract with you, we will require that data be passed to 3rd parties who process data on behalf of HCFX. This may include us passing your name or the name of your company to our banking partners in order to comply with Wire Transfer Regulations, passing details to credit agencies in order comply with AML legislation and passing details of certain trades to regulatory bodies, such as for transaction reporting reasons.
- HCFX may also collect other data from public sources (such as company records) or may purchase data (such as credit data) in order to help facilitate our contract with you, or to meet our compliance obligations. A full list of where your data may be passed and the purposes of us holding and using this data is available on request.
- In relation to our market commentary, if you subscribe to receive our market commentary, you agree that we may processes your email and contact details for the purposes of sending daily market commentary, and consent to us retaining your name and email address in order to send these emails.

### 3. How we protect your data

- HCFX will not sell your data to 3rd parties for the purposes of marketing or share your data with parties for any reason other than for the performance of our contract, or compliance with legislative requirements.
- HCFX will not intentionally collect any information which is considered sensitive but may discover such information during general conversations with you, for example we may be able to discern your political views based on discussions about current affairs affecting the FX markets. HCFX will not record this data in its systems and will take all possible steps to protect this sensitive data including encrypting call recordings.
- HCFX will hold your personal data either in the UK or Italy. However, due to the global nature of our business, your personal data may be transferred to entities within our business or third parties who are located outside the UK or European Economic Area (EEA). Where this is the case and the EU Commission has deemed these countries to not have an adequate level of protection, we have agreements in place which include standard contractual clauses to ensure safeguards are in place that protect your personal data to the same standard as would be expected within the UK or EEA.

### 4. How long we hold your data for

By providing your consent to your personal data being held for the provision of investment or payment services, you acknowledge that HCFX is required by law to retain all data for a period of 5 years from the point at which you cease to trade with HCFX (as required by Anti Money Laundering Legislation) or this period may be longer if we are required to do so by the regulatory or supervisory authorities. This obligation to hold data overrides your rights to having your data deleted and your ability to withdraw consent to hold data.

### 5. Your legal rights

Under GDPR, you have the following rights:

- Your right of access - You have the right to ask us for copies of your personal information.
- Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.
- Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- Your right to object to processing - You have the right to object to the processing of your personal information in certain circumstances.
- Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

### 6. Compliance with law

If we are required to do so by law or have the obligations to cooperate with law enforcement and governmental agencies, the above rights may be restricted. In addition, we may retain data even if you withdraw your consent, where we can demonstrate that we have a legal requirement to process your data. We also reserve the right to disclose personal data in order to protect ourselves from liability, fraudulent or unlawful uses or activity.

#### Cookies On this site:

We use a tracking cookie to track user behaviour and navigation on this site.

We do this to improve our site and to make elements of the site which are more relevant to users more accessible, or to remove areas which are not used.

This cookie is a third-party cookie, but this cookie will not collect any private data, or track your entry or exit from the site. You may disable this cookie by refusing to allow it when you first visit the site, or by deleting it. Removal of this cookie will not impact your usage of the site.