

## **Data Privacy Notice**

Authorised and Regulated by the Financial Conduct Authority

### **Avior Capital Markets International Limited**

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Telephone 44 2036409343

Avior Capital Markets International Limited will collect the company's personal data. This privacy notice intends to show your company how their personal data is processed, for what purposes this will be done and what rights your company has in relation to the personal data that will be collected and used. Personal data is at all times processed in order for Avior Capital Markets International Limited to fulfil its legal obligations.

### **Personal data**

Avior Capital Markets International Limited complies with its GDPR obligations and ensures that personal data shall be processed lawfully and in a transparent manner in relation to your company; that the personal data shall be collected and processed for the purposes stated; that the personal data shall be accurate and at all times kept up to date; that the personal data shall be kept for no longer than is necessary for the purposes for which it is collected; that the personal data shall be adequately securitised and be protected against loss, unauthorised access or processing, and destruction or damage.

Your Company's personal data will be treated as strictly confidential and will be shared only with Avior Capital Markets International Limited's compliance department. Your Company's personal data will only be shared with third parties if consent to do so has been given.

Where personal data has not been obtained directly from your Company, Avior Capital Markets International Limited shall provide your Company with the source from which certain personal data originates, and if applicable whether it came from publicly accessible sources.

### **Data retention**

For audit trail purposes, Avior Capital Markets International Limited shall hold personal data for as long is required in order to fulfil our contractual and statutory duties. It should be noted that our business relationship is a contract of continuing obligation that may last for a number of years. This will enable us to comply with the record keeping obligations under the Money Laundering Regulations 2017.

### **Your Company's personal data rights**

Your Company will have the following rights with respect to their personal data:

- The right to access personal data
- The right to request that personal data regarding them is corrected if it is found to be inaccurate
- The right to request that their personal data is erased where it is no longer necessary
- The right to request that processing is stopped at any time, where relevant
- The right to restrict processing where there is a dispute in relation to the accuracy or processing of the personal data
- The right to request that Avior Capital Markets International Limited provide your Company with their personal data and where possible, transmit that data to another data controller. [applies only where the processing is for the performance of a contract with your Company and the data controller processes the data by automated means].
- The right to object to the processing of personal data [only applies where processing is based on legitimate interest]

- The right not to be subject to a decision which is based solely on automated processing, including profiling which produces legal effects concerning them or similarly significant affects them

### **The type of data collected and purpose for collection**

The type of data we collect along with the purpose for collection is listed below:

#### **Personal data type:**

#### **Purpose:**

Personal information such as gender, name, date of birth and address

To meet our anti money laundering (AML) and other regulatory obligations in relation to Know Your Client (KYC) and client due diligence. To verify your identity using our verification processes.

Contact information (email address and phone number)

In order to send you correspondence in relation to the services provided and to fulfil our regulatory and compliance obligations

Employment information, financial information, relevant education and trading experience

In order to comply with KYC obligations and in order to meet our regulatory obligations relating to assessing the appropriateness of our products and services

Ethnicity, citizenship and social security numbers or national identity and passport numbers

In order to comply with KYC and regulatory trade reporting and other AML obligations

Proof of photo ID, address verification

In order to comply with KYC and regulatory trade reporting and other AML obligations

Unique device number (IP address) and device information including version of web browser you use

When you visit our website, navigate through the pages or fill in any forms, we may collect your unique device number or IP address in order to set up your profile.

Financial sanctions and credit header information

In order to perform our electronic AML screening checks and to comply with other fraud detection policies. This may generate further information on your credit history, criminal convictions or political interests leading to us making decisions based on the results of these checks

### **Lawful basis for processing**

The following state the lawful bases for processing.

- Processing is necessary for the performance of a contract with your Company or to take steps to enter into a contract to conduct regulated activities.
- Processing is necessary for compliance with a legal obligation;

### **Who else may have access to your Personal data?**

Avior Capital Markets may need to share personal data with third parties as may be required by law, or in order to fulfil contractual obligations. Where your personal data is shared with third parties, we will ensure that equivalent safeguards are offered in order to protect your personal data.

### **International transfers of Personal data**

Transfers of personal data to countries outside of the EEA will be deemed unlawful unless the recipients of personal data in non-EEA countries offer an equivalent level of data protection to that of EEA countries.

### **Contact Details**

In order to exercise all right, queries and complaints please contact David Haveron at Avior Capital Markets International Limited's compliance department.