

# PRIVACY POLICY

Global Market Index Limited – 2022



## Privacy Policy

### Introduction

Global Market Index Limited VN (“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 includes 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, marketing and system administration services.
- Professional advisers including lawyers, bankers and auditors providing consultancy, banking, legal and accounting services.
- Regulators, other authorities, 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 country.**

We ensure your personal data is protected to the same or similar degree of 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 access or 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**

A cookie is a small piece of text stored on your computer or device when you visit a website.

We use cookies on our website to provide you with a more relevant and effective experience, including presenting web pages according to your needs or preferences. We are constantly striving to improve the functionality on this site through technology changes. This may mean a change to the way in which personal information is collected or used. The impact of any technology changes which may affect your privacy will be notified in this privacy policy at the time of the change.

We use traffic log cookies to identify which pages are being used. This helps us analyze data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us to provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you. Other than the data you choose to share with us.

Most internet browser are set up to accept cookies. If you do not wish to receive cookies, you may be able to change the settings of your browser to refuse all cookies or to have your computer notify you each time a cookie is sent to it, and thereby give yourself the choice whether to accept it or not. However, this may prevent you from taking full advantage of the website.

### **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.

In addition, all 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.
- **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.

If you are not happy with any aspect of how we collect and use your data, please contact us immediately that we can try to resolve it for you.

## Your duty to tell us about 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.

### **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 on 09 February 2021. 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 policy or notify you through other means.