Privacy Policy

Pepperstone Limited

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Section A – Introduction

1. Introduction

1.1 Your privacy is very important to us, and we're committed to protecting and respecting your personal data. This Privacy Policy describes the types of personal data that we collect about you when you choose to use our services, how we'll use your personal data and how we'll keep it safe. Please take the time to read this Privacy Policy carefully so that you can understand how we handle your personal data.

1.2 This Privacy Policy (together with our Terms and Conditions and any other documents referred to in it) sets out the basis on which we'll process any personal data that you provide to us or we collect about you. Please take the time to read this Policy carefully so that you can understand how we handle your personal data. All personal data in our possession is subject to this Privacy Policy, as updated from time to time.

1.3 For the purpose of this Privacy Policy, Data Protection Law means the General Data Protection Regulation ((EU) 2016/679) as implemented by the Data Protection Act 2018 ("UK GDPR"), as amended by the Data (Use and Access) Act 2025, together with the Privacy and Electronic Communications (EC Directive) Regulations 2003 ("PECR") and any other data protection or privacy laws that apply to us from time to time.

1.4 By using our websites or the Pepperstone iOS or Android applications ("**Apps**"), applying for an account with us or giving us information, you're indicating that you understand how we collect, use and disclose your personal data in line with this Privacy Policy. If you don't agree with this Privacy Policy, you mustn't use our website or Apps, access our services or provide any information to us.

2. Who we are

2.1 Pepperstone Limited is a limited company registered under company number 08965105 at 70 Gracechurch Street, London, EC3V 0HR. Pepperstone Limited is part of the Pepperstone group.

2.2 We're an online trading platform which assists retail and institutional investors to trade over-the-counter derivatives, including margin foreign exchange ("**Forex**") contracts, spread-bets and contracts-for-difference ("**CFDs**").

2.3 "client", "**you**" or "**your**" means an individual who's the subject of the personal data that we process as a data controller.

2.4 We've appointed a data protection officer ("**DPO**") who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below:

Attn: Data Protection Officer
Email: dpo.uk@pepperstone.com

Section B – Collection of personal data

3. What personal data we collect (or receive) about you

3.1 If you're an existing or potential client, the personal data we collect (or receive) about you may include the following:

(a) identity and contact data such as names, usernames or similar identifier, date of birth, gender, together with identification and verification documentation required under applicable anti-money laundering laws ("**AML Laws**"), address, email address and telephone numbers;

(b) financial and trading data such as professional and employment details, information about your income and wealth, information relating to your trading experience, risk tolerance, questionnaire responses and bank account and payment card details;

(c) profile data such as username, password, and security questions and answers;

(d) transaction data such as payment details, records of products and services you've obtained or applied for, orders placed and trading history;

(e) technical data such as internet protocol (IP) address, login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, device ID and other technology on the devices you use;

(f) usage data such as information about how you interact with and use our website, Apps, products and services;

(g) marketing and communications data such as records of telephone calls, email, live chat, and written correspondence and your communication preferences; and

(h) other analogous personal information.

3.2 Sensitive information includes things like your ethnic origin, political opinions, religious or similar beliefs, trade union membership, health, sexual orientation or criminal record. We'll only collect sensitive information about you if we have your consent, or if we're required or authorised by law.

3.3 Where necessary, we also collect information on the following individuals:

(a) company directors, officers, partners and trustees;

(b) a client's agents;

(c) beneficial owners of a client; and

(d) persons dealing with us on a "one-off" basis.

3.4 We're required by AML Laws to sight and record details of certain documents and we may take steps to verify the information we collect.

4. How we collect your personal data

4.1 We may collect personal data about you directly from you or from sources other than you. Sources other than you may include third parties such as your agents, family and friends, our business partners and related entities.

4.2 We may collect (or receive) and process your personal data through:

(a) Your interactions with us, including when:

(i) you apply for an account with us;

(ii) you contact us, whether through our website, our Apps or otherwise (for example, via our online form, by e-mail, post, phone, instant message or Live Chat);

(iii) we ask you to complete surveys that we use for research purposes, although you don't have to respond to them;

(iv) you use your trading account and our products and services. Under no circumstances do we share these details with any third parties other than those who need to know this information in the context of the services we provide;

(b) automated technologies or interactions, including when:

(i) you use and interact with our website or our Apps or through the use of email and website cookies, and similar tracking technology built into our website and Apps. This information may include site areas visited, pages viewed, frequency and duration of visits. Our cookie policy is available on our website and Apps to give you more detailed information on how we use them; or

(ii) you use social media, including "like" buttons and similar functions made available by social media platforms; Or

(c) third parties, including, for example, business partners, analytics providers, search information providers, credit reference agencies and third-party marketing companies or through publicly available sources.

5. How we may use your personal data and purpose

5.1 We may process your personal data for one or more lawful bases of processing ("**Lawful Basis**") depending on the specific purpose for which we are using your data (see below).

5.2 We may process your personal data in the following ways:

Purpose of data processing	Lawful basis
Providing you with the products and services that you've asked for, including carrying out our obligations arising from any contracts connected to you, processing transactions and customer support.	*Your consent, performance of our contract with you, to comply with our legal obligations or necessary for our legitimate interests.*
Verifying your identity, establishing and administering your trading account.	*Your consent, performance of our contract with you, to comply with our legal obligations or necessary for our legitimate interests.*
Maintaining your profile, manage your account and to manage and administer the products and services provided to you, including notifying you of changes to our terms.	*Your consent, performance of our contract with you, to comply with our legal obligations or necessary for our legitimate interests.*
Dealing with and responding to your inquiries, requests, complaints or feedback, including contacting you where necessary.	*Your consent, performance of our contract with you or necessary for our legitimate interests.*
Processing your payments, where applicable.	*Performance of our contract with you or necessary for our legitimate interests or to comply with our legal obligations.*
Enable you to take part in a prize draw, competition or complete a survey	*Your consent, performance of our contract with you or necessary for our legitimate interests.*
Unless you tell us otherwise, keeping you informed about our products and services and those of our relevant business and initiative partners, and tailoring this information to your needs and interests. We may contact you for this purpose by email, post, telephone, SMS, push notifications and other messaging services.	*Your consent or necessary for our legitimate interests.*
Monitoring, improving and developing our websites, Apps, products and services, conducting market research and analytics, and collecting user feedback, including through independent research providers acting on our behalf.	*Your consent, performance of our contract with you or necessary for our legitimate interests.*
Ensuring we have adequate security measures and services so you can safely access our website and our Apps.	*Performance of our contract with you, to comply with our legal obligations or necessary for our legitimate interests.*
Preventing, detecting and investigating potentially prohibited or illegal activities, and enforcing our Terms	*Performance of our contract with you, to comply with our legal obligations or*

Purpose of data processing	Lawful basis
and Conditions.	*necessary for our legitimate interests.*
Complying with all the applicable laws and regulations.	*To comply with our legal obligations.*

6. Marketing communications

Where you have given consent, or where we have a legitimate interest, we may send you information about educational trading materials, events, products and services that may be of interest to you. You can opt out of marketing communications at any time. Opting out of marketing will not affect service communications that are necessary to manage your account.

7. Recording communications

We'll record all communications between you and us, subject to applicable laws. This applies whether the communication is in electronic form, by telephone, in person or otherwise. Telephone conversations may be recorded without warning or further notice. In addition, we'll record telephone calls with you for evidence and quality assurance purposes.

8. Incomplete or inaccurate information

We may not be able to provide you with the products or services that you ask for if you don't provide us with accurate and complete information. You can change your contact details at any time by updating your profile within your Secure Client Area.

9. Aggregated Data

9.1 Aggregated data is general data about groups of people which doesn't identify anyone personally, for example the number of people in a particular industry that engage in forex trading. We use aggregated data to:

(a) help us to understand how you use our products and services and improve your experience with us; and

(b) customise the way that we communicate with you about our products and services so that we can interact with you more effectively.

9.2 We may share aggregated data with our business or industry partners. This data will not include any information that personally identifies you.

10. Anonymity and pseudonymity

In certain situations we may be able to give you the option of using a pseudonym or remain anonymous when you deal with us. We're only able to provide you with this option when it's practical for us to do so, and if we're not required by law to identify you.

Section C – Use or disclosure of personal data

11. Who we'll disclose your personal data to

11.1 We may disclose your personal data for processing (for the purposes set out in this Privacy Policy) to:

(a) any member of our group of companies, which means our subsidiaries, our ultimate holding company and its other subsidiaries ("**Affiliates**");

(b) our third party product and service providers (such as software providers) so that they can provide you with the product or service you're asking for or in which you've expressed an interest;

(c) any person acting on your behalf or authorised by you, including your financial adviser, multi-account manager (MAM), solicitor, settlement agent, accountant, executor, administrator, trustee, guardian or attorney;

(d) introducing brokers, affiliates and agents who refer your business to us;

(e) third party service providers and specialist advisers who provide us with administrative, IT, financial, legal, regulatory, compliance, insurance, research or other services;

(f) other organisations who assist us to provide products and services by performing functions such as client contact, banking, payments, data processing, debt recovery, marketing and advertising, data analysis, business intelligence, website and technology services, including

credit reporting agencies;

(g) analytics and search engine providers that assist us in the improvement and optimisation of our websites or our Apps;

(h) our successors in title, our prospective sellers or buyers of our business or to our Affiliates when we have a merger or re-organisation;

(i) Financial Conduct Authority and other regulatory and government bodies from time to time in the UK and other countries, courts, tribunals, law enforcement agencies or other third parties where required by law or where permitted to do so under the Data Protection Law; and

(j) if you've given your consent, to selected third parties that may contact you about products and services which may be of interest to you in any jurisdiction where we operate.

11.2 We take our obligations to protect your information extremely seriously and make every effort to deal only with parties who share and demonstrate the same attitude. Each of the third parties that we contract with is carefully selected and is only authorised to use your personal data in a secure way, that's necessary for them to perform their services to us. We ensure that confidentiality arrangements are in place and that the third parties comply with all relevant Data Protections Laws and this Privacy Policy.

11.3 We don't sell, rent, or otherwise provide your personal data to third parties unless you consent to this or it's necessary to provide you with our services, conduct our associated business activities or as described in this Privacy Policy.

11.4 Any social media posts or comments that you send to us (on our Facebook page, for instance) will be shared under the terms of the relevant social media platform (e.g. Facebook or Twitter) that you've used and could be made public. We don't control these platforms and we're not responsible for them sharing your information in this way. So, before you make any social media posts, you should review the terms and conditions and privacy policies of the platforms that you use. That way, you'll understand how the platforms will use your information and how you can stop them from using it in certain ways if you're unhappy about it.

11.5 Mobile app platforms:

(a) our Apps run on third-party software platforms, for example, Apple's iOS platform which powers Apple's iPhone, and Google's Android platform which powers Android- based smartphones; and

(b) your use of our Apps is also subject to the relevant mobile app platform provider's terms and conditions and privacy policy. You should review their terms and conditions and privacy policy to ensure you understand the kinds of data (if any) they'll gather about you, how they will use that data, and what you may be able to do if you are unhappy about it.

11.6 Please note that the processing of your personal data by external third parties acting as controllers of your personal data is not covered by this Privacy Policy and is not subject to our data protection standards and practices.

Section D – Your Rights regarding your personal data

12. Your rights

12.1 You're entitled to exercise these rights regarding your personal data, with some exceptions which we've explained below:

(a) request access to your personal data (a "data subject access request");

(b) request correction of the personal data that we hold about you;

(c) request erasure of your personal data in certain circumstances (the "right to be forgotten");

(d) object to processing of your personal data based on legitimate interests or for direct marketing purposes (please note, you can't opt-out of service communications);

(e) ask us to suspend the processing of your personal data, if:

(i) you want us to establish the data's accuracy;

(ii) our use of the data is unlawful but you don't want us to erase it;

(iii) you need us to hold the data even if we no longer require it, so that you can use it to establish, exercise or defend legal claims; or

(iv) you've objected to our use of your personal data but we need to verify whether we have

overriding legitimate grounds to use it;

(f) request the transfer of your personal data in a structured, machine-readable format to you or to a third party ("data portability"); and

(g) withdraw consent at any time if we're relying on your consent to process your personal data. If you withdraw your consent, we may not be able to provide certain products or services to you. We'll let you know if this is the case at the time you withdraw your consent. Please contact:

Attn: Data Protection Officer
Email: dpo.uk@pepperstone.com

12.2 Some rights apply only in certain circumstances and we may not be able to fulfil all requests. We'll let you know if this is the case when you make your request. We will stop processing your personal data unless we have valid legal grounds, a legitimate business purpose, or the processing is required for the establishment, exercise, or defence of legal claims.

12.3 Please quote your name and address when you write to us and provide brief details of the data that you would like a copy of or which you would like to be corrected (this helps us to locate your data more easily). We'll require proof of your identity before providing you with details of any personal data we may hold about you.

12.4 We try to respond to all legitimate requests within 1 (one) month. It might take us longer than this if your request is particularly complex or if you've made a number of requests. We'll let you know if this situation applies to you within 1 month of receiving your request and keep you updated.

12.5 We may charge you a reasonable fee if your request is manifestly unfounded, excessive or repetitive, or we receive a request to provide further copies of the same data. We may also refuse to comply with your request in these circumstances. We'll confirm the cost with you and confirm that you want to proceed before actioning your request.

Section E – Security of your personal data

13. How we protect your personal data

13.1 We're committed to protecting the personal data we hold about you from misuse, unauthorised access and disclosure. We've implemented a range of practices and policies to provide a robust security environment. We ensure the on-going adequacy of these measures by regularly reviewing them. Our security measures include:

(a) implementing stringent IT security policies and providing regular training to employees on cyber vigilance and personal data protection;

(b) requiring our employees to use passwords and two-factor authentication when accessing our systems;

(c) encrypting data sent from your computer to our systems during internettransactions and client access codes transmitted across networks;

(d) employing firewalls, intrusion detection systems, monitoring and the latest patches and virus scanning tools to protect against unauthorised persons and viruses entering our systems;

(e) using dedicated secure networks or encryption when we transmitelectronic data externally (e.g. for outsourcing purposes);

(f) conducting regular risk assessments and security testings (with both internal and external IT security specialists) of our infrastructure;

(g) practising a clean desk policy in all our premises and providing secure storage for physical records; and

(h) employing physical and electronic means such as alarms, cameras and guards (as required) to protect against unauthorised access to buildings.

13.2 Your trading account is protected by your username and password. We recommend that you implement two-factor authentication (2FA) controls to enhance the security of your account. You shouldn't share your username and password with anyone else. Please ensure that you don't submit any personal data that you don't want to be seen, collected or used by other users

when you use social media platforms, group chat and forums.

Section F – Cookies and Third Party Websites

14. How we use cookies

14.1 We use cookies and similar technologies to store and collect information about your use of our website or our Apps. Cookies and similar technologies enable us to track, report, and analyse the use of our website and Apps and to help keep our website and app secure. These enable us to put in place personal settings and load your personal preferences to improve your experience. We'll share this information with our advertising providers such as Facebook or Twitter (e.g. IP addresses or unique mobile identifiers). You can find out more about our cookies in our "Cookies Policy" available on our website here.

15. Use of your personal data submitted to other websites

15.1 Except as otherwise stated, this Privacy Policy only addresses the use and disclosure of personal data that we receive about you or collect from you.

15.2 If you disclose your personal data to others (e.g. websites that we link to), different rules may apply to their use or disclosure of the data that you disclose to them. We'renot responsible for the privacy policies and practices of other websites, even if you accessed the third-party website using links from our website.

15.3 We recommend that you check the policy of each website you visit and contact theowner or operator of that website if you have concerns or questions.

Section G – Where we store and process your personal data

16. Transfers outside of the EEA

16.1 The personal data we collect from you may be transferred to, and stored at, a destination outside the United Kingdom and European Economic Area ("**EEA**"), including places such as Australia, Singapore and the United States. It may also be processed by staff who work for us or one of the suppliers of our Affiliate companies outside the UK and EEA. Our staff outside of the UK and EEA may be engaged in, among other things, the fulfilment of your request, the processing of your payment details and the provision of support services. By submitting your personal data to us, you agree to your personal data being transferred, stored and processed in this way. We'll take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

16.2 If we transfer personal data to third parties located outside the UK and EEA, we ensure that adequate safeguards are in place in accordance with applicable data protection laws. This may include:

(a) transferring data only to countries recognised as providing an adequate level of protection;

(b) using approved legal agreements (such as standard contractual clauses) to ensure your data is protected; or

(c) relying on other lawful transfer mechanisms permitted under data protection law.

16.3 If you'd like a copy of these rules, please contact us using the contact details below.

Section H – Data retention

17. How long we'll keep your personal data

17.1 We'll only retain your personal data for as long as you have consented to it, or for as long as is necessary to us to provide you with our services or fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, reporting or regulatory requirements. For instance, under tax laws we have to keep basic information about our clients (including contact, identity, financial and transaction data), typically for six years after they cease being clients. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

17.2 In some circumstances you can ask us to delete your personal data, see Section D of this Privacy Policy above.

17.3 Where we identify that we no longer need certain personal data, we ensure that it's effectively and securely destroyed.

Section I - Contacting us and complaints

18. How to contact us

18.1 If you have any questions or would like further information about our privacy and information handling practices, please contact:

The Data Protection Officer
Pepperstone Limited
70 Gracechurch Street, London,
EC3V 0HR
dpo.uk@pepperstone.com

Please note that Pepperstone Limited's Regional Head of Legal deals with data protection-related queries and client complaints only. For general sales, billing and product support enquiries please contact Pepperstone support team at support@pepperstone.com.

19. Making a complaint

19.1 We offer a free internal complaint resolution scheme to all of our clients. If you have a privacy complaint, please contact us using the details above to discuss your concerns.

19.2 So that we can deal with your complaint efficiently, please gather all supporting information and any documents relating to your complaint and provide it to us for assessment. We'll try to resolve your complaint as quickly as possible, and in any event within 30 days of hearing from you. If your complaint takes longer to resolve, we'll keep you informed of our progress.

19.3 If you think there's a problem with the way that we're handling your personal data, you have the right to complain to the Information Commissioners Office at:

(a) https://ico.org.uk/make-a-complaint/; or

(b) by calling their helpline on 0303 123 1113.

Section J – Further information

20. Your consent and changes to this Privacy Policy

20.1 We can amend or modify this Privacy Policy from time to time. If we do, we'll postthe updated version on our website and on our Apps. It's your responsibility to check the Privacy Policy every time you submit your personal data to us.

21. Your duty to tell us about changes

21.1 It's important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us by emailing us at support@pepperstone.com.

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