

## DCA Markets B.V. Privacy policy

DCA Markets B.V. (DCA) recognises the importance of privacy, security and data protection to our customers and partners worldwide. We strive to provide information protection across all of our operations and deploy consistent, rigorous policies and procedures. DCA's privacy procedures comply with the EU General Data Protection Regulation (EU-GDPR).

The purpose of our Privacy Policy is to provide our users with transparency of our Processing operations. It is designed to help you understand how we use and safeguard the Personal Information we hold about you. This includes information that we may collect from your on-line activity. This Privacy Policy also informs about your rights in relation to our Processing of your Personal Information.

### *Lawfulness of processing: legal grounds*

Privacy legislation, including the General Data Protection Regulation (GDPR), allows us to process personal information, so long as we have a ground under the law to do so. It also requires us to tell you what those grounds are. As a result, when we process your personal information, we will rely on one of the following processing conditions:

1. Your consent: in some cases, we will ask you for specific permission to process some of your personal information, and we will only process your personal information in this way if you agree to us doing so. You may withdraw your consent at any time.
2. Legal obligation: this is when we are required to process your personal information in order to comply with a legal obligation, such as keeping records for tax purposes or providing information to a public body or law enforcement agency;
3. Performance of a contract: this is when the processing of your personal information is necessary in order to perform our obligations under a contract;
4. Legitimate interests: we will process information about you where it is in our legitimate interest in running a lawful business to do so in order to further that business, so long as it doesn't outweigh your interests; or

### *Where do we get your Personal Information?*

We collect your Personal Information:

1. Through our websites and our mobile device or desktop applications, our program add-ins, or any other DCA Markets tool or delivery platform through which we make our content available (the 'DCA Markets Content Platforms');
2. When you interact with us through social media websites and other websites and apps;
3. As a result of your subscribing to or contracting for our services;
4. As a result of your attendance at our conferences, webinars and other events, or at events not organised by us where you interact with our staff;
5. When you communicate with our staff, including, for example, through instant messaging applications and email;
6. When you visit our premises and your Personal Information is recorded for building security purposes; and/or
7. Through our own research, through our partnerships and from third parties that provide it to us.

### *Types of Personal Information Processed by us*

The categories of Personal Information we may Process are as follows:

1. Personal and business contact information, such as name, address, telephone number and email address;
2. Business contact data such as your employer's name, your employer's address, your role, your business telephone number and your business email address;
3. Financial information, such as your credit/debit card number or other billing information;
4. Information necessary for providing services to you, such as user IDs and passwords, product and service preferences and contact preferences;
5. Geo-location data such as your IP address or physical location;
6. Details of the services you have purchased from us or which you have enquired about, together with any additional information necessary to deliver those services and to respond to your enquiries;
7. Any additional information relating to you that you provide to us directly through DCA Content Platforms; and
8. Information you provide to us through our customer surveys.

### *Who we share your Personal Information with*

1. **Service providers and partners.** We retain service providers and partners to manage or support certain aspects of our business operations on our behalf. This includes members of the same legal group (DCA-Groep). These service providers may be located in the European Economic Area, US or in other locations and may provide services such as service delivery, report personalisation, advertising and marketing activities (including digital and personalised advertising), IT services, email service providers, data hosting, and management or support of our websites. Our service providers are required to safeguard any Personal Information they receive from us and are prohibited from using the Personal Information for any purpose other than to perform the services as instructed by us. We may also share your Personal Information with accountants, auditors, lawyers and other outside professional advisers to DCA, subject to binding contractual obligations of confidentiality. We also take steps to provide adequate protection for any transfers of your Personal Information in accordance with applicable law.
2. **Affiliates.** We may for our legitimate interests share your information with other companies under common ownership or control with us who will Process your information in a manner consistent with this Privacy Policy and subject to appropriate safeguards. All such companies are, nevertheless, bound by an intra-group agreement under which they are required to maintain strict organisational and technical measures to protect your Personal Information.
3. **Compliance with law and protection of people and property.** We may share your information when we believe in good faith that such sharing is reasonably necessary to investigate, prevent, or take action regarding possible illegal activities or to comply with legal process. We may also share your information in situations involving potential threats to the physical safety of any person, violations of this Privacy Policy, or to respond to the claims of violation of the rights of third parties and/or to protect the rights, property and safety of DCA, our employees, users, or the public. This may involve the sharing of your information with law enforcement, government agencies, courts, and/or other organisations.

4. **Business Transactions.** As we develop our business, we may sell, buy, merge or partner with other companies or businesses, or sell some or all of our assets. In such transactions, user information may be among the transferred assets or the assets disclosed in connection with the due diligence for any such transaction.

#### *Data security and integrity*

We have reasonable security policies and procedures in place to protect personal information from unauthorized loss, misuse, alteration, or destruction. Despite our best efforts, however, security cannot be absolutely guaranteed against all threats. To the best of our ability, access to your personal information is limited to those who have a need to know. Those individuals who have access to the data are required to maintain the confidentiality of such information.

We also make reasonable efforts to retain personal information only for so long

1. as the information is necessary to comply with an individual's request,
2. as necessary to comply with legal, regulatory, internal business or policy requirements, or
3. until that person asks that the information be deleted.

The period for which data is retained will depend on the specific nature and circumstances under which the information was collected.

#### *What are your data protection rights?*

Our Company would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following:

1. **The right to access** – You have the right to request Our Company for copies of your personal data. We may charge you a small fee for this service.
2. **The right to rectification** – You have the right to request that Our Company correct any information you believe is inaccurate. You also have the right to request Our Company to complete the information you believe is incomplete.
3. **The right to erasure** – You have the right to request that Our Company erase your personal data, under certain conditions.
4. **The right to restrict processing** – You have the right to request that Our Company restrict the processing of your personal data, under certain conditions.
5. **The right to object to processing** – You have the right to object to Our Company's processing of your personal data, under certain conditions.
6. **The right to data portability** – You have the right to request that Our Company transfer the data that we have collected to another organization, or directly to you, under certain conditions.
7. **The right to access your Personal Information** - You have the right to access your Personal Information that we maintain about you and is held by us in paper records or electronic systems. You can make a request by email or write to the DCA Data Protection Officer at the address shown on the first page of this Privacy Policy.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us. You can find our contact details at the end of this document.

#### *Click behaviour and IP address*

In order to optimize the websites and / or services of DCA, general visitor data is kept, this data is not traceable to a company or person. To do this, DCA also uses the IP address of your computer. This IP address is a number that is automatically assigned to your computer when you visit the internet.

### *DCA's use of Cookies*

Cookies are small pieces of information (files) that a website leaves on your computer. The website instructs the web browser with which you view websites (for example Internet Explorer) to store these cookies on your computer. There are two types of cookies. Session cookies are deleted from your computer as soon as you close your web browser. Permanent cookies remain on your computer, even after you close your web browser.

DCA uses these cookies to facilitate navigation in the website, to analyse the use of the website and to optimize the website.

Session cookies are used for this. If you have an account with DCA Markets, your computer saves your login details by means of a cookie. This way you do not have to log in every time you visit the website.

DCA also uses cookies to collect information about its visitors, for purposes of (service) targeted communication, including the provision of information about our products and targeted marketing activities around DCA's products.

Advertisements may also contain cookies that regulate whether an advertisement is (re) shown to you.

### *How can you refuse cookies?*

You are always entitled to refuse cookies. You can set your web browser (for example Internet Explorer or Mozilla Firefox) to refuse all cookies or only certain cookies (consult the manual of your web browser). If you refuse cookies, certain services may not be available to you.

### *DCA and other websites*

On the DCA sites you will find a number of hyperlinks to other websites. However, DCA cannot be held responsible and does not accept any liability with regard to the handling of your data by those parties. Read the privacy statement, if any, of the site you are visiting. Changes DCA reserves the right to make changes to this privacy statement. You will be notified of this in the event of major changes

### *Changes to Terms and Conditions*

These terms and conditions were published on 1 May 2019 and replace with immediate effect the terms and conditions previously published on 1 June 2018.

### *Contact details:*

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