

RIA CAPITAL MARKETS LIMITED

PRIVACY POLICY

RIA Capital Markets Limited ("**we**") are committed to protecting and respecting the confidentiality, integrity and security of personal information about individuals whose data we hold ("**you**", "**your**").

This policy sets out the basis on which any personal data that we collect from you, or that you provide to us, or which is provided by others, will be processed by us, and how RIA complies with its responsibilities under applicable data protection laws including, when and to the extent in force, the Data Protection Act 1998, the General Data Protection Regulation (Regulation (EU) 2016/679) and the Privacy and Electronic Communications Regulations 2003 (together, the "**Data Protection Laws**"). Please read this policy carefully.

Data controller

For the purpose of the Data Protection Laws, the data controller of your personal information is RIA Capital Markets Limited of 91 George Street, Edinburgh EH2 3ES

Personal data collection

We hold personal data about you which is provided or collected when we are appointed to provide services to you or on your behalf, from your use of our website, and/or by some other means (such as via a business card) or other public sources.

Where we provide services to you or on your behalf, we will hold your:

- name;
- contact details (including email, telephone number and address);
- job title
- copy identification documents provided to us in connection with our KYC procedures;

Purposes for which personal data is used

All personal data about you will be added to our systems and will be used for communication of marketing materials to you and for the purposes listed below, together with any other purpose specifically permitted by the Data Protection Laws or which you may specifically authorise.

We will use your personal data to:

- provide advice and services to you or your service provider on your behalf;
- notify you about changes or developments to the services that we provide;
- administer accounts and to perform control and risk management functions;
- enable us to fulfil our client due diligence requirements;

- assist us in undertaking credit enquiries or assessments;
- conduct analysis activities (including statistical and behavioural analysis) to allow us to identify behavioural or market trends and to improve our product offerings];
- provide you with information about our services;
- respond to your enquiries, complaints or requests;
- follow up as part of our customer care procedures;
- ensure that content from our site is presented in the most effective manner for you and for your computer;

Legal basis for processing

Where we collect personal information about you (such as via a business card or other public sources), we are processing it on the basis that in doing so, we are pursuing our legitimate business interests. In either of these cases, you have the right to object at any time to us processing your personal data for marketing purposes.

Where we are appointed as an investment service provider, and either you or your service provider provide us with personal information based on that appointment, we shall process your personal information on the basis that such processing is necessary for the performance of that contract.

Access and other rights

You may request to view personal information that we hold about you at any point by making a request in writing to us at RIA Capital Markets Limited, 91 George Street, Edinburgh EH2 3ES lorna.haysmith@ria.co.uk. This request will be responded to within 30 working days and you will be provided with a copy of the information we hold about you. If we require more time to respond fully to any request, we will notify you in writing within the 30 day period referred to. Any additional copies of any information we provide to you may be subject to a reasonable fee.

You also have other rights under Data Protection Laws in relation to your personal data. In particular, you may have (i) the right to request that we rectify or erase information we hold about you in certain circumstances, (ii) the right to ask us to limit our processing of your information, (iii) the right (if we are processing information based on your consent, such as for marketing purposes) to withdraw your consent, (iv) the right to object to certain processing of your information (including the right to object to processing of your personal data for direct marketing purposes at any time), (v) the right to ask us to move, copy or transfer your personal information to another organisation. If you wish to exercise any of these rights, please contact us at lorna.haysmith@ria.co.uk.

If you are not satisfied with our response to any queries or complaints you raise with us or believe we are not processing your personal data not in accordance with the Data Protection Laws you can complain to the Information Commissioner's Office (<https://ico.org.uk/>).

Accuracy of personal data

We try to ensure that the information we hold about you is accurate and kept up-to-date by contacting you at regular intervals. However, if in the meantime you believe that any information we are holding about you is inaccurate, out-of-date or incomplete, please notify us at lorna.haysmith@ria.co.uk as soon as possible. We will promptly correct or delete any information found to be incorrect.

Security

We have put in place what we consider to be appropriate security measures against unlawful or unauthorised processing of personal data we hold, and against the accidental loss of, or damage to, personal data.

Disclosure of your information

We will not disclose personal information we hold about you to any third party except as set out below.

We may disclose personal data to third parties who are providing services to us, including IT, marketing (if you agree) and data cleansing, or for any other purposes specifically permitted by the Data Protection Laws or for any other purpose which you may authorise.

We may also disclose personal data we hold about you to the following categories of third parties:

- a) IT service providers (including IT support);
- b) Settlement & Clearing Agent
- c) Trade reporting service providers;
- d) professional advisers;
- e) our business affiliates; and/or
- f) prospective buyers of our business and/or assets.

We will also disclose personal data if we are under a duty to do so in order to comply with any legal obligation imposed on us. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

To the extent that we transfer any personal data to any third party processor, we will only do so if that third party agrees to put in place appropriate security measures against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, the personal data.

Transferring personal data outside the EEA

We may transfer any personal data that we hold about you to a country outside the European Economic Area ("EEA") but we will only do so in accordance with the Data Protection Laws. If we do

transfer any data outside the EEA, we will provide you with details of the country to which data is being transferred, along with details of the measures we have put in place to protect it (which you may see a copy of, on request).

Retention of Data

We will not hold information or data about you for longer than we consider to be reasonably necessary for the above purposes. In any event, your data will be retained for no longer than six years after we cease providing relevant services to you or on your behalf. Please note that you may contact us at any time at lorna.haysmith@ria.co.uk and ask for your details to be removed (please refer to the section headed "**Access and other rights**" above).

Cookies

Our website does not use cookies.

IP addresses

Our Website logs your IP address and other information about your computer for administrative and security reasons and to collate statistical (non-personal) information about the use of our Website.

We do not gather any more information about you without your knowledge and active participation and permission than as is set out in this Privacy Policy.

Links to other websites

Our website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Changes to this policy

We may make changes to this data protection policy at any time. Any changes we make will be posted on this page and, where appropriate, notified to you in writing. Please refer back to this page regularly to see any changes or updates to this policy.

Contact

If you have any queries about this policy or your personal data, or you wish to submit an access request or raise a complaint about the way your personal information has been handled, please do so in writing and address it to Lorna Hay Smith at Ria Capital Markets Limited, 91 George Street, Edinburgh EH2 3ES or by email to lorna.haysmith@ria.co.uk