

**S Q U A R E**

GLOBAL MARKETS

# **Square Global Limited**

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## **DATA PROTECTION POLICY**

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**May 2018**

**v1.0**

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## DATA PROTECTION POLICY

We will safeguard and utilise any personal data provided to us in accordance with the Principles set out in the General Data Protection Regulation (GDPR).

### What This Privacy Policy Covers

- What personal data we collect
- How we collect personal data
- What we use personal data for
- When we may disclose personal data
- How we protect personal data and where we store it
- Rights in relation to the personal data we collect
- How long we will hold data
- How we update or change this Policy
- How queries can be made about the handling of Personal Data

### What Personal Data We May Collect

We typically process the following types of personal data:

- Personal details, such as name, date of birth, country of residence and national insurance number, or equivalent
- Contact details such as personal and/or professional email address, postal address and/or telephone number
- Identification documentation, such as a photocopy of passports, driving licences, ID cards or other documentation required by local law. Copies of these documents may include a photo ID
- We may also collate and hold data found from the results of google searches and other sources in the public domain

These types of personal data may include sensitive personal data.

In the event that we hold personal email addresses or other personal data for the purpose of providing services (such as market commentary or research updates for example), as opposed to holding this information for legal or regulatory reasons, we will ask for consent in order to continue holding such personal data and sending such information.

Square Global makes every effort to maintain the accuracy and completeness of the personal data which it stores and to ensure all personal data is up to date. Please contact us promptly if there are any changes to the personal data we hold or if it becomes apparent that we have inaccurate personal data. Square Global shall not be responsible for any losses arising from any inaccurate, inauthentic, deficient or incomplete personal data or sensitive personal data provided to us.

**What We Use Personal Data For**

**Square Global** may process personal data for any of the following purposes:

- For the purpose of relevant employment checks
- For regulatory compliance purposes relating to AML, KYC and FATCA among other requirements
- Where relevant, to provide services where a personal email address has been provided by the recipient – as described above, in such cases consent will be sought in order to continue holding such personal data and sending such information

**When We May Disclose Personal Data**

**Square Global** does not and will not sell, rent or trade personal data. We will only disclose personal data in the ways set in the following circumstances:

- To third parties who process personal data on our behalf (such as our internal system providers, employee payroll provider, pension provider)
- To any national and/or international regulatory, enforcement or exchange body or court where we are required to do so by applicable law or regulation or at their request
- To any central or local government department and other statutory or public bodies (such as FCA, HMRC, DWP)

**How We Protect Personal Data And Where We Store It**

**Square Global** is committed to safeguarding and protecting personal data and maintains appropriate security to protect any personal data provided to us from improper or accidental disclosure, use, access, loss, modification or damage.

The personal data we collect may be processed in countries located in the European Economic Area (“EEA”). We will take all steps reasonably necessary to ensure that personal data is treated securely and in accordance with applicable laws and regulations and with **Square Global’s** policies and standards.

**Rights In Relation To The Personal Data We Collect**

Personal Data will be dealt with under GDPR in accordance with the following Principles:

- a) Processed lawfully, fairly and in a transparent manner in relation to individuals
- b) Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be incompatible with the initial purposes
- c) Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed
- d) Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay

- e) Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals
- f) Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures

The following rights are available:

- **Right of access to the data.** In accordance with GDPR, upon request from the data subject, we will provide a copy of personal data
- **Right to rectification.** In accordance with GDPR, we will correct any inaccuracy in the personal data we hold concerning a data subject

In the event of an update or modification of the personal data we store, accessing a copy of this personal data, or a data subject wishing us to stop processing any of their personal data, subject to applicable law, a request can be made by writing to the contact details set out below. We will process the request within the time prescribed by GDPR.

#### How Long We Will Hold Personal Data For

We will only retain personal data for as long as necessary to fulfil the purpose for which it was collected or to comply with legal, regulatory or internal policy requirements. This unless otherwise indicated is for 5 years from whenever your relationship or engagement with Square Global ends.

**Square Global** is subject to stringent record keeping obligations under local legislation including all the financial regulations and GDPR legislation. Furthermore, in order to ensure the rights and freedoms of our clients or our staff, we may hold certain information connected to client entities for longer time periods on the basis that it may be required to assist with the mitigation of any future tax or regulatory query into the transactions or other affairs undertaken by an entity or trust to which we provide regulated services.

#### How We Update Or Change This Policy

We may change or update parts of this Policy to maintain our compliance with applicable laws and regulations or following an update to our internal practices. We will do this by updating the wording on our website and updating our internal records.

#### Contact Us

If you would like to contact us in relation to this Policy or anything else in connection with the personal data we hold, or would like to update your personal data, contact us via email or in writing using the following details:

Email: [compliance@squareglobalmarkets.com](mailto:compliance@squareglobalmarkets.com)

Postal address: 175 Piccadilly, London W1J 9EN

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For more information about the GDPR, you can visit the [Information Commissioner's Office](#) website. The Information Commissioner's Office is the UK's independent organisation that upholds information rights in the public interest.