

2018

Privacy Policy

PRIVACY POLICY

One Global Market Limited (or “we”, “us”, “OGM”) respects your right to privacy. This Privacy Policy (“Policy”) applies to personal information that we collect through our website www.ogm.market as well as any other related sites and applications. This Policy does not apply to websites operated by other organizations and other third parties.

The Policy also applies to personal information that we collect when you use or interact with our services through any correspondence made with us by phone, e-mail or otherwise. The Policy aims to inform you about the type of information we gather, who we share it with, what we use it for, how we keep it secure and what your data privacy rights are.

If you have any questions or concerns about our use of your personal information, please contact us at compliance@ogm.market.

What does OGM do?

OGM is a provider of online foreign exchange (FX) trading, CFD trading and related services. OGM is headquartered in London, UK. For more information about OGM, please see the “About” section of our website www.ogm.market.

What personal information does OGM collect and why?

The personal information that we may collect about you broadly falls into the following categories:

INFORMATION THAT YOU PROVIDE VOLUNTARILY

You may give us your identity, contact and financial data etc. by filling in forms or by corresponding with us by post, phone, e-mail or otherwise. This includes personal information you provide when you:

- Apply for our products or services
- Create an account on our website
- Subscribe to our or related third party service or publications
- Request marketing to be sent to you
- Enter a competition, promotion or survey
- Give us some feedback

In addition to above, certain parts of our website may ask you to provide personal information voluntarily (for example, we may ask you to provide your contact details in order to register an account with us, to subscribe to marketing communications from us, and/or to submit enquiries to us). The personal information that you are asked to provide, and the reasons why you are asked to provide it, will be made clear to you at the point we ask you to provide your personal information.

INFORMATION THAT WE COLLECT AUTOMATICALLY

When you visit our website, we may collect certain information automatically from your device. In some countries, including countries in the European Economic Area (EEA), this information may be considered personal information under applicable data protection laws.

Specifically, the information we collect automatically may include information like your IP address, device type, unique device identification numbers, browser-type, broad geographic location (for example, country or city-level location) and other technical information. We may also collect information about how your device has interacted with our website, including the pages accessed and links clicked.

Collecting this information enables us to better understand the visitors who come to our website, where they come from, and what content on our website is of interest to them. We use this information for our internal analytics purposes and to improve the quality and relevance of our website to our visitors.

Some of this information may be collected using cookies and similar tracking technology. For detailed information on the cookies we use and the purposes for which we use them.

INFORMATION THAT WE OBTAIN FROM THIRD PARTY OR PUBLICLY AVAILABLE SOURCES

From time to time, we may receive personal information about you from third party sources, but only where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us.

We use the information we receive from these third parties to enhance the services we provide to you, such as providing curated content that is relevant to services we provide you or topics you are interested in.

Who does OGM share my personal information with?

We may disclose your personal information to the following categories of recipients:

- to **our group companies**, third party services providers and partners who provide data processing services to us (for example, to support the delivery of, provide functionality on, or help to enhance the security of our website), or who otherwise process personal information for purposes that are described in this Privacy Policy or notified to you when we collect your personal information.
- to any **competent law enforcement body, regulatory, government agency, court** or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person.
- to a **potential buyer** (and its agents and advisers) in connection with any proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Policy.
- to any other person with your consent to the disclosure.

Lawful basis for processing personal information

Our lawful basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

However, we will normally collect personal information from you only where we have your consent to do so, where we need the personal information to perform a contract with you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect personal information from you or may otherwise need the personal information to protect vital interests.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

Similarly, if we collect and use your personal information in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time what those legitimate interests are.

If you have questions about or need further information concerning the lawful basis on which we collect and use your personal information, please contact us.

Purpose for which we will use your personal information

The following are the reasons/purposes for which we will use your personal information:

1. In order to serve you properly as a client;
2. In administering our operations and business;
3. Managing risk, financial crime, responding to regulatory enquiries or requirements and legal claims and proceedings;

4. Marketing.

How does OGM keep my personal information secure?

We use appropriate technical and organisational measures to protect the personal information that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information. In particular, we:

- Hold personal information in secure facilities and where the information is held electronically, on secure servers.
- Use encrypted transmission links whenever we can.
- Use other safeguards such as firewalls, authentication systems (e.g., passwords), and access control mechanisms to control unauthorised access to systems and data.
- Regularly review our information collection, storage and processing practices, including physical security measures, to guard against unauthorised access to systems.
- Restrict access to personal information to our employees, contractors and agents who need to know that information in order to process it for us and who are subject to strict contractual confidentiality obligations. OGM may discipline or terminate individuals who maliciously acquire information, without being entitled to its access.

International data transfers

Subject to certain conditions, we may transfer your personal information to a third party in countries outside the EEA for further processing in accordance with the purposes set out in this Privacy Policy. In these circumstances we will, as required by applicable law, ensure that your privacy rights are adequately protected by appropriate technical, organisation, contractual or other lawful means. These include putting in place data transfer agreements for transfers of personal information between our group companies, which require all group companies to protect personal information they process from the EEA in accordance with European Union data protection law. We have implemented similar appropriate safeguards with our third party service providers and partners and further details can be provided upon request.

Data retention

Your personal information will be retained for as long as it is necessary to carry out the purposes set out in this Privacy Policy (unless longer retention is required by law). However, we will not retain any of your personal information beyond this period and the retention of your personal information will be subject to periodic review. We may keep an anonymised form of your personal information, which will no longer refer to you without time limits, to the extent that we have a legitimate and lawful interest in doing so.

Automated decision making

In some instances, our use of your personal information may result in automated decisions being taken (including profiling) that legally affect you or similarly significantly affect you.

Automated decisions mean that a decision concerning you is made automatically on the basis of a computer determination (using software algorithms), without our human review.

We make automated decisions at account opening, where we check that the offered products or services are appropriate for you based on the information you provide to us. For example we may use information about your financial standing or socio-demographic information to assess whether you are appropriate and understand the risk involved when trading our products.

When we make an automated decision about you, you have the right to contest the decision, to express your point of view, and to require a human review of the decision. Please note that you may be required to prove your identity for us to service you.

Your data protection rights

Subject to certain conditions, data protection law provides individuals with rights, including the right to: access, rectify, withdraw consent, erase, restrict, transport, and object to the processing of, their personal information. Individuals also have the right to lodge a complaint with the relevant information protection authority if they believe that their personal information is not being processed in accordance with the law. Further information about your rights is set out below:

- Right to obtain a copy of your personal information. You have the right to obtain a copy of the personal information we hold about you.
- Right to rectification. You may request that we rectify any inaccurate and/or complete any incomplete personal information. We will then correct our records, and notify any third parties to whom such personal information may have been transmitted as described above.
- Right to data portability. You may request a copy of all personal information you have provided to us after which we will transmit those data to another data controller of your choice.
- Right to opt-out of marketing communications. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you.
- Right to withdraw consent. You may withdraw your consent to the processing of your personal information at any time. Such withdrawal will not affect the lawfulness of processing based on your previous consent. Please note that if you withdraw your consent, you may not be able to benefit from certain service features for which the processing of your personal information is essential.
- Right to object to processing. You may request that we stop processing your personal information. Please note you may not be able to benefit from certain service features for which the processing of your personal information is essential.
- Right to erasure. You may request that we erase your personal information and we will comply, unless there is a lawful reason for not doing so.
- Your right to lodge a complaint with the supervisory authority. We suggest that you contact us about any questions or if you have a complaint in relation to how we process your personal information. However, you do have the right to contact the relevant supervisory authority directly. To contact the Information Commissioner’s Office in the United Kingdom, please visit the [ICO website](#) for instructions. Alternatively, you may contact the authority of the country you reside in. Please find further details [here](#).

If you wish to exercise any of these rights, please contact us. Please note that you may be required to prove your identity for us to service you. We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

Updates to this policy

We may update this Policy from time to time in response to changing legal, technical or business developments. When we update our Policy, we will take appropriate measures to inform you, consistent with the significance of the changes we make.