

**PRIVACY POLICY OF BENCHMARK FINANCE**

Please read the information in this document and if you have any questions, you can contact us in the way indicated in the "Contact us" section below.

## **1. Who is administrating your personal data**

Your personal data is processed by BenchMark Finance Jsc, whose registered address is 32, Cherni Vrah Blvd., ent. A, Sofia, 1407, Bulgaria, authorized and regulated by the Financial Supervision Commission (FSC), with license № 03-0212/09.05.2006, registered in the Commercial register of the Registry Agency with Unified Identity Code (UIC) 131225156, hereinafter the "Company".

## **2. On what basis and for what purposes we process your data**

If you wish to open a trading account with the Company, you will be asked for certain information through which to establish your identification. In order to open a real account and conclude an investment services contract, we need to verify your identity, which is why we require you to provide information about your physical identity (such as name, date and place of birth, identity document, residence, citizenship, contact details, etc.). In order to provide you with the most appropriate investment service, we require information about your experience and knowledge in the field of investment. We also collect certain financial information, including data on income, assets, banking information, etc. You may be required to provide additional information that we need to fulfill the regulatory obligations for identification and maintenance of data in current form and volume.

We process your data on a legal basis and in compliance with the regulatory obligations that apply to the Company, as an investment intermediary, to identify and categorize its clients, determine their tax status and take measures against money laundering. These obligations are provided for in the Markets in Financial Instruments Act, the Anti-Money Laundering Measures Act and the by-laws on their implementation. If you decide that you do not want to provide us with certain data, it is likely that you will not be able to receive the requested service. In addition to the above purposes, we may process your data to provide you with current information about products and services that we believe are of interest to you. In these cases, we perform the processing only if we have received your consent to receive such information. You have the right to withdraw your consent at any time. We follow the rule that you can object to the processing of data for the stated purposes at any time, in which case we terminate the processing immediately.

If you sign up for our Financial Markets Training product (e.g., by opening a demo account, or by attending seminars or courses), the information we require from you is kept to a minimum (data and contact), which we need for the provision of the service and for contact with you. In these cases, we process and send you information about the product based on our legitimate interest in increasing your knowledge and skills in the field of trading in financial instruments, in view of the opportunity to be a customer, and to improve the quality of services. We process your data only to the extent necessary to achieve the objectives described above and in compliance with the principle that this does not infringe your rights in a way that would take precedence over our legitimate interest. We adhere to the rule that you may object at any time to the processing of data for the stated purposes.

The Company may also collect personal data through the use of "cookies", considered in *Policy for use of "cookies"*.

For the purpose of improving our services, the Company can process any information, available in the public registers (e.g. public databases), as well as information, received during the course of conducting its legal requirements.

In order to keep your data up to date, we may require you to update, correct, or verify its accuracy.

## **3. To whom can we disclose your data**

We do not disclose your personal information unless the provision of certain information is required by law. In exceptional circumstances, we may provide your personal data to competent public authorities and / or supervisory authorities in proceedings before them or to another person when required by law. In certain cases, we are required to disclose information: in pursuance of a judicial, regulatory or other official act or decision; based on an agreement between us and another controller (s) or

processor (s) of personal data, in accordance with the requirements of applicable law; upon instructions given by you or instructions of a person authorized by you in accordance with the terms of the Trade Agreement. We require all third parties to whom we disclose personal data or who may receive it on our behalf to guarantee its confidentiality and manage it in accordance with legal requirements.

#### **4. How do we protect your data**

We apply organizational, physical and technological measures to ensure data security. We have adopted the necessary internal policies. Our employees are aware of the requirements regarding the protection of your personal data. Processing is minimized to the data required to achieve the respective objectives.

We have introduced a number of measures for the effective application of data protection principles, including but not limited to:

- ensuring constant confidentiality, integrity, availability and sustainability of processing systems and services;
- measures in case of a physical or technical incident for timely restoration of the availability and access to personal data;
- an internal process of regular testing, evaluation and evaluation of the effectiveness of technical and organizational measures to ensure the security of processing;
- technical and organizational measures to prevent accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access to personal data.

#### **5. How long we store your data**

We respect the principle that your personal data should be kept for a period not longer than necessary to achieve the relevant purposes. We keep your data while you are a client of the Company and for a period of 5 years after the year of termination of employment, and for accounting records and financial statements, including documents for tax control, audit and subsequent financial inspections - 10 years from January 1 of the reporting period following the reporting period to which they relate. In certain circumstances, if we are required to have a longer retention period by law, we may retain your personal data for a longer period

#### **6. What are your rights**

You have the following rights under personal data protection law:

**Right of access:** You have the right to receive confirmation from us whether your data is being processed and, if so, to receive a copy of the data and information about the processing. Please note that for additional copies requested by you, we may charge a reasonable fee in view of our administrative costs.

**Right of correction:** If your data is incomplete or inaccurate, you have the right to request its correction.

**Right to restrict processing:** In some cases, you may have the right to ask us to restrict the processing of your personal data, e.g. if you want to determine the reason for their processing. Restricted processing usually comes down to simply storing your personal data, with all other processing being discontinued.

**Right of portability:** You have the right to receive your personal data provided to us in a structured, widely used and machine-readable format, as well as to transfer them to another administrator without hindrance from us, as long as the processing is done automatically. and on the basis of your consent.

**Right to withdraw consent:** If the processing is based on your consent, you have the right to withdraw it at any time.

**Right to object:** You have the right to object to the Company against the processing of your personal data if there is a legal basis for it; when the objection is justified, your personal data will not be processed in the future. You can always object to the processing of your personal data for direct marketing purposes, in which case we will stop processing immediately.

**Right of appeal:** If you consider that the processing of your personal data violates the provisions of applicable law, you have the right to file a complaint to the Commission for Personal Data Protection.

**Right to be deleted ("right to be forgotten"):** In some cases, you may have the right to ask us to delete your personal data. Such will be the case, for example, where data are no longer needed for the purposes for which they were collected; if you withdraw your consent, if the processing is based on it; if you exercise your right to object; and others.

Please note that in some cases your rights are limited and in the presence of a legal basis for processing some of them may be inapplicable, e.g. we will be able to change, limit or delete your personal data only to the extent, order and manner in which we are obliged to retain them due to regulatory or legal requirements.

We may need to request additional information from you in connection with your request so that we can verify your identity and that you have the appropriate right. This is an additional security measure to ensure that your personal data is not disclosed to third parties who are not entitled to receive it, and to be able to process your request in a timely manner. We will take action to satisfy your rights above for free, unless your requests are manifestly unfounded or excessive, in particular because of their recurrence - in which case we may charge a reasonable fee in view of our administrative costs or refuse to take action. at your request.

### **How can you exercise your rights?**

In order to exercise your rights in connection with the processing of your personal data by us, please contact us in one of the ways listed below (section "Contact us"). We will respond to your comments, questions and requests within one month of receiving them. If necessary, this period may be extended by another two months, taking into account the complexity and number of requests, of which you will be informed within the initial period of one month.

### **7. Contact us**

For questions and requests in connection with the processing of your personal data, please send them to the attention of our data protection officer at: BenchMark Finance AD, Sofia 1407, 19 Viskyar Planina Str. 2nd floor or by e-mail at [dpo@benchmarkfx.co.uk](mailto:dpo@benchmarkfx.co.uk)