

Black Pearl Securities Ltd Privacy Policy

1. Introduction

Black Pearl Securities privacy policy is reviewed annually. All personal information we hold will be governed by our most current privacy notice.

Black Pearl Securities Ltd are fully committed to respecting and protecting your personal data as customer privacy is of utmost importance to us. We ensure that when you choose to use our services, you know what data we collect about you and how we use and protect that personal data.

This notice outlines how we manage your personal information supplied to us by you or a third party in connection with our provision of services to you or which we collect from your use of our services and/or our app(s) or website(s) along with your rights in respect of the processing of your personal information. It also details your rights in respect of our processing of your personal information.

Please note that if you are a Black Pearl Securities Ltd employee, a contractor to Black Pearl Securities Ltd, or a third-party service provider, your personal information will be used in connection with your employment contract, or your contractual relationship.

2. About Us

2.1 Black Pearl Securities Ltd is a limited company with company number 8823678 whose registered office is at 28 King Street, London, EC2V 8EH. We supply an online trading platform as an STP Broker which assists retail and institutional investors to trade in the foreign exchange market ("Forex") and other instruments.

2.2 Any reference to 'us', 'our', 'we' or 'Black Pearl Securities Ltd' in this privacy notice is a reference to each group company within the Black Pearl Securities group or as the context requires unless otherwise stated. Similarly, any reference to 'you', 'your', 'yours' or 'yourself' in this privacy notice is a reference to any of our customers and potential customers as the context requires unless otherwise stated.

3. Scope of this Privacy Notice

3.1 This Privacy Notice (together with our "terms and conditions" and any other documents referred to in it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. This Privacy Notice also sets out how you can instruct us if you prefer to limit the use of your personal data and the procedures that we have in place to safeguard your privacy.

3.2 For the purpose of this Privacy Notice, Data Protection Legislation means: the UK General Data Protection Regulation (as retained and defined in the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019) ("UK GDPR"), the Data Protection Act 2018 ("DPA 2018"), and the Privacy and Electronic Communications Regulations 2003 ("PECR"), as amended. For the purpose of the Data Protection Legislation, the data controller is Black Pearl Securities Ltd.

3.3 We encourage you to read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

3.4 This Privacy Notice explains how we collect, process, and protect your personal data, as well as your statutory rights under Data Protection Legislation. Please read it carefully. If you have questions regarding our data practices, contact us using the details provided in the 'Further Information' section below.

4. Which Personal Data do we Collect?

4.1 If you're an existing or potential client, the personal data we collect (or receive) about you may include the following:

- a. Name, address and contact details;
- b. Date of birth and gender;
- c. Location data (such as IP address);
- d. Username, password security questions and answers;
- e. Information relating to source of wealth;
- f. Occupation;
- g. Bank account details, including institution name, branch, account name, bank identifier, and account number or IBAN;
- h. Information relating to your trading experience;
- i. We are required by law to identify you if you are opening a new account or adding a new signatory to an existing account. Anti-money laundering laws require us to sight and record details of certain documents (i.e. photographic and non-photographic documents) in order to meet the standards set under those laws. Identification documentation, as required under anti-money laundering legislation or other legislation relevant to the services we provide to you, including:
 - i. passport
 - ii. driver's licence
 - iii. national identity card;
 - iv. utility bills
 - v. trust deed
 - vi. a credit or bankruptcy check; and/or
 - vii. other Information we consider necessary to our functions and activities.

4.2 We may check some of the information that you provide to us against third party databases to confirm that it is accurate.

4.3 You have the option of not identifying yourself, or of using a pseudonym, when dealing with us in relation to a particular matter. However, we can only provide you with this option when it is not impracticable for us to do so and when no law requires identification.

4.4 We may also collect social media content where this is in the public domain, and any messages you send direct to us via social media. This information can include posts and comments, pictures and video footage on websites such as YouTube, Facebook and Twitter.

4.5 We may have access to your financial information, such as your billing address, bank account details and payment history in order to allow us to take payments from you in connection with the online trading products you purchase, send you refunds or enable our customer service to deal with your enquiries. Under no circumstances are these details disclosed to any third parties other than those who need to know this information for the performance of the services requested.

4.6 Generally, we require that organisations outside the Black Pearl Securities group who handle or obtain personal information acknowledge the confidentiality of this information, undertake to respect any individual's right to privacy and comply with all the relevant data protection laws and this privacy notice. Third party service providers such as credit referencing agencies may keep a record of any searches performed on our behalf and may use the search details to assist other companies in performing their searches.

5. How We Collect Your Personal Data?

5.1 We may also obtain personal information about you through your use of our websites, apps or through the use of cookies on our websites and/or apps, in particular by recording which pages you look at on our websites. We may record any communications electronically, by telephone, in person or otherwise. Such telephone conversations may be recorded without the use of a warning tone or any other further notice. These recordings will be Black Pearl Securities sole property and will constitute evidence of the communications between us.

6. For which Purpose will we use your Personal Data?

6.1 Our Primary purpose in collecting personal information is to provide you with a secure and efficient customised experience. We use your data to improve our services, content and advertising, and for loss prevention and anti-fraud purposes.

6.2 We process your personal data for the following specific purposes and legal bases:

- a. To deliver our online trading platforms, match orders, execute transactions, and provide customer support (Performance of Contract);
- b. To verify your identity, source of wealth, and residential address in compliance with the UK Money Laundering Regulations 2017 and FCA rules (Compliance with Legal Obligation);
- c. To assess the appropriateness of our leveraged CFD products under FCA Conduct of Business rules (Compliance with Legal Obligation);
- d. To detect, prevent, and remediate financial crime, fraud, spam, or cyber threats (Compliance with Legal Obligation and Legitimate Interests);
- e. To administer your account, process deposits and withdrawals, and issue mandatory regulatory reporting (Performance of Contract and Legal Obligation);

- f. To evaluate and enhance our systems, IT infrastructure, mobile applications, and web services (Legitimate Interests);
- g. To establish, exercise, or defend actual or prospective legal claims (Legitimate Interests and Legal Obligation); and
- h. Where you have provided express consent, to deliver tailored marketing communications (Consent).

6.3 If you are an existing customer, we may contact you with information, products or services that you request from us or with information, products or services which are similar to the services we are providing to you (independently or jointly with others), unless you have opted out to be contacted for such purposes. We may contact you for this purpose by post, telephone, fax and SMS as well as by email. If you change your mind about being contacted in the future, please let us know.

6.4 We do not sell, rent, or otherwise provide your personal data to third parties unless you consent to this or it is necessary to provide you with our services, conduct our associated business activities or as described in this Privacy Notice. We may share information with any member of our group of companies, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006 (the “Affiliates”).

6.5 If you choose to post messages on any online forum or other message platforms that we may make available for this purpose on our Apps or our Website, we may collect that information you provide to us. We may process this information as necessary to respond to any social media posts or other public comments you might make, whether they are directed to us or about us, our Websites, mobile Apps or other activities, to resolve disputes, provide customer support and troubleshoot problems, as permitted by law. Lawful Basis: to comply with our legal obligations, performance of our contract with you and necessary for our legitimate interests.

7. Your Contact Information

7.1 Where applicable, you can change your contact details at any time by updating your profile within your trading account. You can also update your communication preferences by changing your settings related to your notification choices.

7.2 We may use information you provide to us, or to third parties offering combined services with us, to customise the services we provide to you.

8. Data Security

8.1 The Internet is not a secure medium. Please be aware that communications over the Internet, such as emails/webmails, are not secure unless they have been encrypted. Your communications may route through a number of countries before being delivered. This is the nature of the World Wide Web/Internet.

8.2 We cannot accept responsibility for any unauthorised access or loss of personal data that is beyond our control. However, the protection of your personal data is extremely important to us and we have put in place a range of security procedures to protect it, as set out in this Privacy Notice.

8.3 Where you have been allocated a trading account, this area is protected by your username and password, which you should never divulge to anyone else.

8.4 We will use reasonable endeavours to implement appropriate policies, rules and technical measures to protect the personal data that we have under our control (having regard to the type and amount of that data) from unauthorised access, improper use or disclosure, unauthorised modification, unlawful destruction or accidental loss. For instance, our security measures include, but are not limited to:

- a. educating our employees as to their obligations with regard to your personal data;
- b. requiring our employees to use passwords and two-factor authentication when accessing our systems;
- c. encrypting data sent from your computer to our systems during internet transactions and client access codes transmitted across networks;
- d. employing firewalls, intrusion detection systems and virus scanning tools to protect against unauthorised persons and viruses entering our systems;
- e. using dedicated secure networks or encryption when we transmit electronic data for purposes of outsourcing;
- f. practising a clean desk policy in all premises occupied by us and our related bodies corporate and providing secure storage for physical records; and
- g. employing physical and electronic means such as alarms, cameras and guards (as required) to protect against unauthorised access to buildings.

8.5 We will ensure that your information will not be disclosed to government institutions or authorities except if required by law (e.g. when requested by regulatory bodies or law enforcement organisations in accordance with applicable legislation).

8.6 Certain services may include social networking, chat room or forum features. When using these features please ensure that you do not submit any personal data that you do not want to be seen, collected or used by other users.

9. To Whom Will Your Data be Disclosed

9.1 Your personal data may, for the purposes set out in this Privacy Notice, be disclosed for processing to:

- a. our affiliated product and service providers and external product and service providers for whom we act as agent (so that they may provide you with the product or service you seek or in which you have expressed an interest);
- b. any person acting on your behalf, including your financial adviser, solicitor, settlement agent, accountant, executor, administrator, trustee, guardian or attorney;
- c. your nominated employment reference (to confirm details about you);
- d. introducing brokers, affiliates and agents who refer your business to us;
- e. credit reporting agencies;
- f. other financial institutions and organisations at their request if you seek credit from them (so that they may assess whether to offer you credit);
- g. our third-party consultants, (sub-) contractors, suppliers or other service providers who may access your personal data when providing services to us. For instance, we may share your data with email marketing companies who help us to email or mail our newsletter to you and other people who help us provide our Websites, our Apps, and related services to you. This includes information technology experts who design and host our Websites, our Apps and general service companies. We disclose personal data when we outsource certain functions, including bulk mailing, market research, direct marketing, statement production, debt recovery and information technology support. We also seek expert help from time to time to help us improve our systems, products and services;
- h. auditors or contractors or other advisers auditing, assisting with or advising on any of our business purposes;
- i. analytics and search engine providers that assist us in the improvement and optimisation of our Websites or our Apps;
- j. our successors in title, our prospective sellers or buyers of our business or to our Affiliates when we have a merger or re-organisation;
- k. government bodies and law enforcement agencies where required by law and in response to other legal and regulatory requests;
- l. any third-party where such disclosure is required in order to enforce or apply our Terms and Conditions of Service or other relevant agreements;
- m. to protect the rights, property, integrity or security of our company, our customers, or others (including, without limitation, you). This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction;
- n. to our advertising providers for re-targeting purposes; and
- o. where you have consented to this, to selected third parties that may contact you about products and services which may be of interest to you in any jurisdiction where we operate.

9.2 Any social media posts or comments you send to us (on our Facebook page, for instance) will be shared under the terms of the relevant social media platform (e.g. Facebook or Twitter) on which they are written and could be made public. Other people, not us, control these platforms. We are not responsible for this kind of sharing. So, before you make any such remarks or observations, you should review the terms and conditions and privacy policies of the social media platforms you use. That way, you will understand how they will use your information, what information relating to you they will place in the public domain, and how you can stop them from doing so if you are unhappy about it.

9.3 In all circumstances where personal data may become known to our contractors, agents and outsourced service providers, there are confidentiality arrangements in place. Contractors, agents and outsourced service providers are not able to use or disclose personal data for any purposes other than our own.

9.4 Mobile app platforms:

- a. our Apps run on third-party software platforms, for example, Apple's iOS platform which powers Apple's iPhone and Google's Android platform which powers Android-based smartphones; and
- b. if you use any of our Apps, your usage of those apps is also subject to the relevant mobile app platform provider's terms and conditions and privacy policy. You should review their terms and conditions and privacy policy to ensure you understand what information (if any) they will gather about you, how they will use that information, and what you may be able to do if you are unhappy about it.

9.5 We will only collect, process, or verify government-issued identification details (such as your National Insurance number, passport number, or tax identification number) where strictly necessary to satisfy statutory client verification requirements under the UK Money Laundering Regulations, to comply with mandatory transaction reporting under UK MiFIR, or in response to a lawful request from a competent court, regulatory, or law enforcement authority.

10. Your Rights Under UK GDPR

10.1 Rights of Access

You have the right to request a copy of the personal information we hold about you. We provide this information free of charge. In line with statutory rules, we may charge a reasonable fee or refuse to act only where a request is manifestly unfounded, excessive, or repetitive.

10.2 Right to Rectification

You have the right to obtain the rectification without undue delay of inaccurate or incomplete personal information.

10.3 Right to Erasure

You may request the deletion of your personal information where there is no legal justification for its continued processing. Please note that under UK GDPR Article 17(3), this right is not absolute. As an FCA-regulated firm, Black Pearl Securities Ltd is legally mandated by the UK Money Laundering Regulations and FCA retention rules to retain customer identity, account verification records, and transaction data for a minimum statutory period (typically 5 to 7 years after the termination of the business relationship). We cannot erase data where retention is strictly required by law or necessary for legal defense.

10.4 Right to Restriction of Processing

You can request that we suspend the active processing of your data where: (i) you contest its accuracy; (ii) the processing is unlawful but you oppose erasure; (iii) we no longer need the data for operational purposes, but you require it to establish or defend legal claims; or (iv) you have objected to processing pending verification of overriding legitimate grounds.

10.5 Right to Data Portability

Where technically feasible, you have the right to receive personal data you provided to us in a structured, commonly used, and machine-readable format to transmit to another controller.

10.6 Right to Object

You have the absolute right to object at any time to the processing of your personal data for direct marketing purposes. Where we process data based on our legitimate interests, you may object on grounds relating to your particular situation, unless we demonstrate compelling legitimate grounds that override your fundamental rights.

10.7 Withdrawal of Consent

Where processing relies on your consent, you may withdraw that consent at any time without affecting the lawfulness of processing carried out prior to withdrawal.

10.8 Children's Data

Our services are strictly designed for individuals aged 18 and over. We do not knowingly collect personal information from individuals under 18. If we identify that account records contain minors' data, the account will be closed immediately and data handled in accordance with statutory retention obligations.

11. Cookies and Tracking Technologies

11.1 Cookies are small data files placed on your computer or mobile device when you visit our website or access our trading applications.

11.2 We use cookies to enable core website functionality, ensure session security when logged into the client portal, analyse website traffic trends, and, where permitted, deliver relevant promotional content.

11.3 Cookie Classification

- a. **Strictly Necessary Cookies:** Essential for platform navigation, security authentication, and portal functionality. These do not require consent.
- b. **Performance & Analytics Cookies:** Used to assess user interaction patterns and improve service delivery.
- c. **Targeting & Advertising Cookies:** Used to serve targeted advertisements based on browsing behavior.

11.4 Consent Management

In accordance with the Privacy and Electronic Communications Regulations (PECR) and UK GDPR, non-essential cookies (analytics and marketing) are only deployed where you provide active, affirmative consent via our website Cookie Preference Banner. You can modify or withdraw your cookie preferences at any time through our website settings or via your browser configuration.

12. International Transfers of Personal Data

12.1 As an STP / Matched Principal Broker, personal data collected from you may be transferred to, stored at, or processed by service providers, liquidity providers, or group entities operating outside the United Kingdom.

12.2 Whenever we transfer your personal data outside the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following statutory safeguards is implemented:

Adequacy Regulations: The recipient country has been officially determined by the UK Government to provide an adequate level of protection for personal data.

Standard Contractual Safeguards: In the absence of an adequacy decision, transfers are governed by appropriate safeguards, such as the UK International Data Transfer Agreement (IDTA) or the UK Addendum to the EU Standard Contractual Clauses, accompanied by risk assessments where required.

Technical Protections: Cross-border transmissions are encrypted in transit and protected by strict contractual confidentiality obligations.

13. Your Consent and Changes to this Privacy Notice

13.1 We reserve the right to amend or modify this Privacy Notice and if we do so we will post the changes on our Website and on our Apps. It is your responsibility to check the Privacy Notice every time you submit your personal data to us.

13.2 In the event that our purposes for processing personal data change, we will contact you as soon as practicable and seek your consent where such notification relates to a new additional purpose for processing.

14. Use of Your Personal Data Submitted to Other Websites

14.1 Except as otherwise expressly included in this Privacy Notice, this document addresses only the use and disclosure of personal data that we receive about you or collect from you.

14.2 If you disclose your personal data to others (e.g. websites we link to), different rules may apply to their use or disclosure of the data that you disclose to them. We are not responsible for the privacy policies and practices of other websites even if you accessed the third-party website using links from our website.

14.3 We recommend that you check the policy of each website you visit and contact the owner or operator of such website if you have concerns or questions.

15. How do we Store Personal Information

15.1 Safeguarding the privacy of your information is important to us, whether you interact with us personally, by phone, by mail, over the internet or any other electronic medium. We hold personal information in a combination of secure computer storage facilities and paperbased files and other records and take steps to protect the personal information we hold from misuse, loss, unauthorised access, modification or disclosure. When we consider that personal information is no longer needed, we will remove any details that will identify you or we will securely destroy the records. However, we may need to maintain records for a significant period of time.

15.2 For example, we are subject to certain anti-money laundering laws which require us to retain

- a. A copy of the documents we used to comply with our customer due diligence obligations;
- b. supporting evidence and records of transactions with you and your relationship with us, for a period of five years after our business relationship with you has ended.

15.3 If we hold any personal information in the form of a recorded communication, by telephone, electronic, in person or otherwise, this information will be held in line with local regulatory requirements which will either be 5 years or 10 years after our business relationship with you has ended.

15.4 Where you have opted out of receiving marketing communications, we will hold your details on our suppression list so that we know you do not want to receive these communications.

16. Further Information

16.1 If you would like to let us know about something we have done or failed to do in relation to your personal data, whether positive or negative, please let us know. Your comments enable us as an organisation to learn and continuously improve our services.

If you are dissatisfied with our response to a data privacy request or believe our processing infringes UK Data Protection Legislation, you have the right to lodge a complaint with the UK supervisory authority:

- **Information Commissioner's Office (ICO)**
- **Address:** Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
- **Telephone:** 0303 123 1113
- **Website:** ico.org.uk

16.2 Questions, comments and requests regarding this Privacy Notice should be addressed to:

The Head of Compliance
Black Pearl Securities Ltd
28 King Street
London EC2V 8EH
compliance@bpprime.com

17. Your Duty to Inform Us of Changes

17.1 If any of the personal data that you have provided to us changes, for example if you change your email address or if you wish to cancel any request you have made of us, or if you become aware we have any inaccurate personal data about you, please let us know by sending an email to support@bpprime.com.

17.2 We will not be responsible for any losses arising from any inaccurate, inauthentic, deficient or incomplete Personal Data that you provide to us. Black Pearl Securities Ltd compliance department deals with data protection questions and complaints, so for any other services or queries please contact our dedicated support team on support@bpprime.com.