

Web Privacy Policy

BACKGROUND:

This policy is specifically in respect of use of this web site and only covers personal data and information collected and used by the site.

If you are a customer of GHC Capital Markets Limited, you should refer to our Privacy Statement which is available on request.

If you have signed up to receive our newsletter or marketing updates you will have provided us with consent. A copy of our marketing consent form is available on our website.

GHC Capital Markets Limited (GHC) understands that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits this website ("Our Site") and will only collect and use personal data in ways that are described here, and in a manner that is consistent with Our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of Our Privacy Policy is deemed to occur upon your first use of Our Site. If you do not accept and agree with this Privacy Policy, you must stop using Our Site immediately.

1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

"Account" means an account required to access and/or use certain areas and features of Our Site;

"Cookie" means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in section 13, below;

"Cookie Law" means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;

"personal data" means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us via Our Site. This definition shall, where applicable, incorporate the definitions provided in the [Data Protection Act 1998] OR [EU Regulation 2016/679 – the General Data Protection Regulation ("GDPR")]; and

"We/Us/Our" means GHC Capital Markets Limited, a limited company registered in England under company number 3113332, whose registered address is 22-30 Horsefair Street, Leicester LE1 5BD

2. Information About Us

- 2.1 Our Site is owned and operated by GHC Capital Markets Limited.
- 2.2 Our Data Breach Liaison & Reporting Officer can be contacted by email at customerservices@ghcl.co.uk, by telephone on 0116 204 5500, or by post at our registered address
- 2.3 We are authorised and regulated by The Financial Conduct Authority (FCA) registered number 152998
- 2.4 We are registered with the Information Commissioner's Office (ICO) as a data controller.

3. What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites. Please note that We have no control over how your data is collected, stored, or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them.

4. Your Rights

- 4.1 As a data subject, you have the following rights under the GDPR, which this Policy and Our use of personal data have been designed to uphold:
 - 4.1.1 The right to be informed about Our collection and use of personal data;
 - 4.1.2 The right of access to the personal data We hold about you (see section 12);
 - 4.1.3 The right to rectification if any personal data We hold about you is inaccurate or incomplete (please contact Us using the details in section 14);
 - 4.1.4 The right to be forgotten – i.e. the right to ask Us to delete any personal data We hold about you (We only hold your personal data for a limited time, as explained in section 6 but if you would like Us to delete it sooner, please contact Us using the details in section 14);
 - 4.1.5 The right to restrict (i.e. prevent) the processing of your personal data;
 - 4.1.6 The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);
 - 4.1.7 The right to object to Us using your personal data for particular purposes; and
 - 4.1.8 Rights with respect to automated decision making and profiling.
- 4.2 If you have any cause for complaint about Our use of your personal data, please contact Us using the details provided in section 14 and We will do Our best to solve the problem for you. If We are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office.
- 4.3 For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

5. What Data Do We Collect?

- 5.1 Depending upon your use of Our Site, We may collect some or all of the following personal and non-personal data (please also see section 13 on Our use of Cookies and similar technologies):
 - Title
 - First Name
 - Last Name
 - FCA No. – if you are an IFA
 - Company
 - Postal Address
 - Contact information such as email addresses and telephone numbers;
- 5.2 The website collects and stores the following User information about the user's visit to the website;
 - Date and Time of Visit
 - URL(s) Viewed
 - User's IP Address
 - User's Web Browser
 - User's Operating System
 - User's Device (if detectable)
- 5.3 The website uses Cookies for User Authentication, Accessibility and Personalisation, allowing user to login to the website (where applicable) to access content, features or functionality and set and remember site preferences when visiting and returning to the website. This includes;
 - Site Colour Theme: Standard or High Contrast
 - Site Font Size: Standard or Custom Font Size
 - Site Session Identifier - Unique reference for the current visit to the website, used to;
 - a) Allow the User to Login to the website and access its content in a secure manner

b) Personalise the content of the website during the current visit

5.4 The website uses Google Analytics and Cookies to collect the following information for the purpose of statistical analysis of website visitor traffic and analysing user behaviour on the website;

- Date and Time of Visit
- URL(s) Viewed
- User's IP Address – which is used to detect approximate geographic location
- User's Web Browser
- User's Operating System
- User's Device settings including;
- Device Type Identifiers
- Screen Resolution (or Viewport for mobile and tablet devices)
- Device Capability including HTML, CSS, Video, Java and Flash Support including version numbers
- Referring URL - the page the User came from when they arrived on the website such as a from a search engine, online advert or a link on another website
- User's Language and other User input preferences (Keyboard settings and current Date / Time Zone)
- User's Interaction with the Website including;
- Links Clicked
- Images Viewed
- Mouse movements or other User Interactions (on Touch devices)
- Custom Data the website has been configured to pass to Google Analytics for reporting purposes; including, but not limited to;
- Pay-Per-Click Advertising Information
- Ecommerce Transaction Information
- Ecommerce Product Information

6. How Do We Use Your Data?

- 6.1 All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under the GDPR at all times. For more details on security see section 7, below.
- 6.2 Our use of your personal data will always have a lawful basis, either because it is necessary for Our performance of a contract with you, because you have consented to Our use of your personal data (e.g. by subscribing to emails), or because it is in Our legitimate interests. Specifically, We may use your data for the following purposes:
- 6.2.1 Providing and managing your Account;
 - 6.2.2 Providing and managing your access to Our Site;
 - 6.2.3 Personalising and tailoring your experience on Our Site;
 - 6.2.4 Replying to emails from you;
 - 6.2.5 Supplying you with emails that you have opted into (you may unsubscribe or opt-out at any time by contacting customer services on 0345 607 1914, emailing customerservices@ghcl.co.uk or by using the unsubscribe facility where available;
 - 6.2.6 Market research;
 - 6.2.7 Analysing your use of Our Site to enable Us to continually improve Our Site and your user experience;
- 6.3 With your permission and/or where permitted by law, We may also use your data for marketing purposes which may include contacting you by email telephone and/or post with information, news and offers on Our products

and services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003.

- 6.4 You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it.
- 6.5 We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Data will therefore be retained for the following periods (or its retention will be determined on the following basis):

Relationship Level	Type of Record	Retention Period
Existing account holder	<i>Account related</i>	
	Emails	Indefinitely
	Telephone call recording	Indefinitely
	Copy of mailed correspondence	Indefinitely
	Account records	Indefinitely
	Meeting notes	Indefinitely
	<i>Non account related</i>	
Marketing campaign mailing list	12 months post campaign	
Ex account holder	<i>Account related</i>	
	Emails	7 years post account closing
	Telephone call recording	Indefinitely
	Copy of mailed correspondence	7 years post account closing
	Account records	7 years post account closing
	<i>Non account related</i>	
	Marketing campaign mailing list	12 months post campaign
Prospect/non customers	Marketing campaign mailing list	12 months post campaign
	Inbound calls	Indefinitely
	Meeting notes	12 months post meeting

Please note that the retention periods may differ where we have a legal or regulatory obligation

7. How and Where Do We Store Your Data?

- 7.1 We only keep your personal data for as long as We need to in order to use it as described above in section 6, and/or for as long as We have your permission to keep it.
- 7.2 Your data will only be stored within the European Economic Area (“the EEA”) (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein).
- 7.3 Data security is very important to Us, and to protect your data We have taken suitable measures to safeguard and secure data collected through Our Site.
- 7.4 Steps We take to secure and protect your data include:
- 7.4.1 Information about your visit to the website is stored on servers hosted by ISO 27001 certified UK Tier 3 data centres

8. Do We Share Your Data?

- 8.1 We may sometimes contract with third parties to supply services to you on Our behalf. These may include payment processing, delivery of goods, search engine facilities, advertising, and marketing. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, We will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, Our obligations, and the obligations of the third party under the law.
- 8.2 We may compile statistics about the use of Our Site including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the law.
- 8.3 In certain circumstances, We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal requirements, a court order, or a governmental authority.

9. What Happens If Our Business Changes Hands?

- 9.1 We may, from time to time, expand or reduce Our business and this may involve the sale and/or the transfer of control of all or part of Our business. Any personal data that you have provided will, where it is relevant to any part of Our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use that data only for the same purposes for which it was originally collected by Us.
- 9.2 In the event that any of your data is to be transferred in such a manner, you will not be contacted in advance and informed of the changes.

10. How Can You Control Your Data?

- 10.1 When you submit personal data via Our Site, you may be given options to restrict Our use of your data. In particular, We aim to give you strong controls on Our use of your data for direct marketing purposes including the ability to opt-out of receiving emails from Us which you may do by unsubscribing using the links provided in Our emails and at the point of providing your details.

11. Your Right to Withhold Information

- 11.1 You may access Our Site without providing any data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.
- 11.2 You may restrict Our use of Cookies. For more information, see section 13.

12. How Can You Access Your Data?

You have the right to ask for a copy of any of your personal data held by Us (where such data is held). Under the GDPR, no fee is payable and We will provide any and all information in response to your request free of charge. Please contact Us for more details at using the contact details below in section 14.

13. Our Use of Cookies

- 13.1 Our Site may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve Our services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.
- 13.2 All Cookies used by and on Our Site are used in accordance with current Cookie Law.
- 13.3 Certain features of Our Site depend on Cookies to function. Cookie Law deems these Cookies to be “strictly necessary”. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser’s settings but please be aware that

Our Site may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.

- 13.4 Our Site uses analytics services provided by Google. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling Us to better understand how Our Site is used. This, in turn, enables Us to improve Our Site and the services offered through it. You do not have to allow Us to use these Cookies, however whilst Our use of them does not pose any risk to your privacy or your safe use of Our Site, it does enable Us to continually improve Our Site, making it a better and more useful experience for you.
- 13.5 The analytics service(s) used by Our Site use(s) Cookies to gather the required information.
- 13.6 In addition to the controls that We provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third party cookies. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.
- 13.7 You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.
- 13.8 It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

14. Contacting Us

If you have any questions about Our Site or this Privacy Policy, please contact us by email at customerservices@ghcl.co.uk, by telephone on 0345 607 1914, or by post at our registered address. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you (as under section 12, above).

15. Changes to Our Privacy Policy

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.