

# PRIVACY STATEMENT

## INTRODUCTION

Alta Trading (“we”, “us”, or “our”) takes data privacy seriously and is committed to protecting personal data. This Statement explains how and why Alta Trading collects, uses and processed your personal data. The processing we undertake may include the collection, collation, storage, modification, access or destruction of your information and may be completed manually or through automatic means. It also explains individuals’ rights (“you”, “your”) in relation to the information.

## WHO WE ARE

“Alta Trading” is a trading name that refers to Alta Trading UK Limited (02275739 registered in England and Wales) and Alta Trading US Inc., both involved in trading and financing of commodity contracts.

Alta Trading’s Compliance Officer is Chidi Ekere and whose contact details are listed below:

**e: [c.ekere@altatrading.com](mailto:c.ekere@altatrading.com) t: +44(0)207 543 6629**

## HOW DO WE COLLECT INFORMATION FROM YOU?

We collect information from you from when we meet you, from information provided by you or your company, agent or intermediary, from any correspondence with you, from any application forms that you provide us with, including counterparty onboarding documents, or from third parties where we might need to carry out background checks.

## WHAT TYPE OF INFORMATION IS COLLECTED FROM YOU?

The personal information that we collect may include your name, address, email address, telephone numbers, date of birth, gender, medical & financial information, job title, tax identification details, passport/identity card/driving licence details, national insurance details, nationality, place of residence, tax residence, immediate family details, education, personal circumstances, sources of funds and interests, and any other information to determine money laundering risk. If you make a payment to us, your payment details are collected by us and our third-party payment processors.

We endeavour to collect only personal data necessary for agreed purposes with those we enter into contracts with and ask that any counterparts only share personal data (at a corporate level and with individuals associated with their organisation) where it is strictly needed for those purposes.

## HOW IS YOUR INFORMATION USED?

We may use your information in order to:

1. Manage our counterparty and business contact information.
2. Fulfil contract obligations in accordance with agreements we have in place with you
3. Maintaining and using IT systems.
4. Legitimate interests pursued by us to administer, manage and develop our business and service offerings
5. Administering and managing our website and systems

We review regularly the data that we hold and will only hold your personal data on our systems for as long as is necessary for the relevant activity.

## **LEGAL BASIS FOR USING YOUR INFORMATION**

### **Contract**

Where we enter into, or take steps to enter into, an agreement with you, we may use personal information in order to fulfil necessary performance obligations for the contract. This might be to enter into a trade agreement with you, arrange and make contractual payments or to carry out any other obligations as specified by the contract.

We may also share such data with third parties that we engage to assist in meeting our contractual obligations with you, including other of our affiliated companies and our professional advisors where it is necessary for us to seek their advice, debt collection agencies where it is necessary to recover money that you may owe us, other third parties that we may introduce to you and our data storage providers.

### **Legal obligation**

We may need to use personal information to comply with a legal obligation that we are subject to, for example to comply with anti-money laundering laws or as required by tax authorities or any competent court or legal authority. In this respect we may also share your information with our advisors, our external accountants, with third parties that carry out background checks and relevant regulators and law enforcement agencies.

### **Legal Claims**

The processing is necessary for the establishment, exercise or defence of legal claims. This allows us to share information with our legal advisors and insurers.

### **Vital Interests**

For example, to prevent someone being seriously harmed or killed.

### **Legitimate Interests**

Except where the processing is unfair to you, we use personal data for the following:

- Training our staff and/or monitoring performance
- Seeking advice such as legal advice to protect our own interests.
- Facilitating our operations and activities.

You have the right to object to us processing your data for our legitimate interests. If you wish to object, please contact our Data Compliance Officer with details of your objection.

## **WHO HAS ACCESS TO YOUR INFORMATION?**

We will not sell or rent your information to third parties or share your information with third parties for marketing purposes.

We may pass your information to third parties for the purposes of carrying out our activities (for example, to make payments). However, when we use third party providers, we disclose only the personal information that is necessary to deliver the service, and we have contracts in place requiring them to keep your information secure and not to use it for their own direct marketing purposes.

## SENDING INFORMATION TO OTHER COUNTRIES

Information may get sent to other countries where we communicate with you overseas. Such countries may not have similar data protection laws to the UK, and we cannot guarantee the security of any information transmitted or received in this way and such communication is at your own risk.

Where we store information on or rely on third party websites and/or servers save for where such contractual requirement cannot otherwise be fulfilled, we will seek to ensure that the third-party website and/or servers are located in a country will similar data protection laws to the UK.

## YOUR RIGHTS

Individuals have certain rights over their personal data which are outlined below. The Compliance Officer is responsible for fulfilling these rights.

Your rights are as follows:

- You can also ask what information we hold about you and be provided with a copy.
- If information is incorrect, you can ask us to correct it.
- You can ask us to delete information that we hold about you in certain circumstances, for example where we no longer need the information.
- You can ask us to send you, or another organisation (where technically feasible to do so), certain types of information about you.
- Our use of information about you may be restricted in some cases, for example if you tell us that the information is inaccurate, where we can only use it for the limited purposes while we check its accuracy.

To exercise your rights concerning personal data, please email the Compliance Officer on the details listed above.

## SECURITY

When you give us personal information, we make our best effort to ensure its security on our systems. We have security measures in place to protect our information (including personal data), which involve detecting, investigating and resolving security threats.

Where personal information is transmitted normally over the internet/by email (for example your email address), we cannot guarantee the security of any information you transmit to us, and you do so at your own risk.

## USE OF 'COOKIES'

We may from time to time use cookies collected from our websites. 'Cookies' are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. It is possible to switch off cookies by setting your browser preferences. Turning cookies off may result in a loss of functionality when using our website.

## POLICY REVIEW

We may change this statement from time to time as part of regular review. This privacy statement was last updated on the **22 July 2021**