

Privacy Policy

Protecting your privacy and the confidentiality of your Personal Data is fundamental to the way GWGUK does business.

The purpose of this Privacy Policy is to make you aware of how we will use your Personal Data (i.e. information which identifies you) and the measures and processes we have put in place in order to ensure that we comply with the European General Data Protection Regulation 2016/679(GDPR).

We may change or update parts of this policy in order to maintain our compliance with applicable law and regulation or following an update to our internal practices.

1. Scope

Goldenway Global Investments (UK) Ltd is a company registered in England and Wales under company registration number 03405217. We are registered on the Information Commissioner's Office Register, registration number ZA348298, and act as the data controller when processing your data, this means that we determine the purposes for and the manner in which we (or our Processors as defined in the GDPR) process your Personal Data. If you provide GWGUK Personal Data about your employees, agents and contractors, and those of associated entities or direct someone else to give their Personal Data to GWGUK, you must show that person a copy of this policy so that they understand the manner in which their Personal Data may be used or disclosed.

2. What This Policy Covers

This Policy Covers:

- What personal data we hold about you
- How we use your personal data
- Recording communications with you
- International transfers of personal data
- When we may disclose your personal data
- Your rights in relation to the personal data we collect
- How long we will store your personal data for
- How you can contact us



3. What Personal Data We Collect About You

We process the following types of personal data we collect:

- Name
- Date of birth
- Place of birth and nationality
- Identification documentation, such as copy of the passport, National Identity card or such other documentation as is required by local law, copies of these documents may include a photograph of your face
- Home address, email address and other contact details
- Transactions and account information
- Details of preferences for types of products or services, marketing events or materials in the context of their employment with you
- Authorised signatory lists including facsimiles of the signatures of your employees, agents and contractors, and those of associated entities

We may ask for additional information such as, but not limited to, financial standing, employment details, trading experience and trading statements. We will also use our own records and information from other sources where applicable.

We process your personal information to meet our legal, statutory and contractual obligations and to provide you with our products and services. We will never collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this notice.

In certain circumstances, it may be necessary for you to provide us with your Personal Data, for example, to enable us to provide services to you or to comply with our legal obligations. In other circumstances, it will be at your discretion whether you provide us with personal data or not. However, failure to supply any of the personal data we may request may mean that we are unable to maintain or provide services or products to you.

We make every effort to maintain the accuracy and completeness of your Personal Data which we store and to ensure all of your Personal Data is up to date. However, you can assist us with this by promptly contacting us if there are any changes to your Personal Data. We shall not be responsible for any losses you suffer arising from any inaccurate, inauthentic, deficient or incomplete Personal Data that you provide to us.



4. How We Use Your Personal Data (Fair and Lawful Processing)

We only process your Personal Data where:

- a. the processing is necessary to comply with our legal obligations including:
 - to carry out money laundering, financial and credit checks and for fraud and crime prevention and detection purposes;
 - to comply with our legal and regulatory obligations and requests anywhere in the world, including reporting to and/or being audited by national and international regulatory bodies; and
 - to comply with court orders and exercise and/or defend our legal rights, as otherwise permitted or required by any applicable law or regulation; or
- b. the processing is necessary for the performance of a contract to which you are party, or in order to take steps at your request prior to entering into such contract; or
- c. the processing is necessary for our legitimate interests or the legitimate interests of others (except where such interests are overridden by the interests or rights of your employees, agents and contractors and those of your associated entities requiring the protection of their Personal Data) including:
 - for monitoring and assessing compliance with GWGUK's policies and standards;
 - for promotional and marketing materials and activities;
 - to comply with court orders and exercise and/or defend our legal rights, as otherwise permitted or required by any applicable law or regulation;
 - to identify persons authorised to trade on behalf of our clients;
 - for administrative purposes in relation to the security and access of our systems, offices, platforms and secure websites and applications;
 - to contact you about the services and products we offer; and
 - for any other legitimate business purpose including the reasons set out in section 7 below
- d. you confirm that your employee, agents and contractors and those of your associated entities consent to the processing of their Personal Data on the basis set out in this policy.

5. Recording Communications

We and persons acting on our behalf may record and/or monitor communications (including telephone conversations over landlines and mobile phone, emails, instant messaging, chat rooms, fax and other electronic communications) between you and our employees, agents, consultants, contractors. We only do this to the extent permitted by applicable law for legitimate business purposes or other purposes permitted or required by law. We collect this type of personal data for several reasons but not limited to:

- Recording fact;



- Complying with applicable law and regulation;
- Complying with internal procedures and policies;
- Facilitating administration and support;
- Assisting with security, crime prevention and fraud purposes; and
- Investigating or detecting unauthorised use, wrongful use or abuse of our services, systems or other materials.

6. International Transfers of Personal Data

Because we are a global organisation, your Personal Data will be transferred to and processed by entities within our group of companies other than the entity that collected the personal data.

Your Personal Data will be processed in (including accessed in or stored in) for the purposes set out in clause 5 above a country or territory outside the European Economic Area (“EEA”), which does not offer the same level of protection of personal data as may be enjoyed within your country. By providing your Personal Data to us, you agree to this processing. We will ensure that we have adequate safeguards in place so that your Personal Data is treated securely and in accordance with applicable law and regulation and with our policies and standards.

The most common reason for us disclosing information overseas is because we use service providers to perform some functions on our behalf, and some of these service providers are located outside the EEA. We only disclose your information to these organisations when it is necessary for the services they provide to us. For the most part, these service providers are entities related to us which perform a range of operational, technology, website hosting, email servers, marketing database, and customer service functions for us. These entities are located in the following locations: Hong Kong and Tai Wan

7. When We May Disclose Your Personal Data

GWGUK do not and will not share, disclose or trade your personal data. We will only disclose your personal data in the ways set out in this policy and in the following circumstances:

- To any entity within the Goldenway group of companies;
- To third parties who process your personal data on our behalf (such as our systems provider)
- To any provider of a guarantee, security or other credit support for obligations to us
- To financial institutions, regulatory bodies, exchange body or there is a legal requirement.



8. Your Rights In Relation To the Personal Data We Collect

If you wish to **update, modify/correct, delete or, access** your Personal Data, receive a copy of the personal data collected from you, or if you would like us to **stop processing** any of your Personal Data, to the extent you are entitled to do so under applicable law, you can make such a request by writing to us at the address set out in section 10 below. Upon receipt of your written request, we will respond within 28 days. If such changes are made pursuant to your request(s) this may affect our ability to continue to provide our services to you and in such circumstances we reserve the right to terminate this Agreement on notice to you.

In any of the situations listed above, in order for us to comply with our security obligations and to prevent unauthorised disclosure of data, we may request that you provide us with a copy of a valid means of identification and verification of the identity of the individual whose personal data is the subject of such a request.

9. How Long We Will Hold Your Personal Data For

We will only retain your Personal Data for as long as necessary to fulfill the purpose for which it was collected or to comply with legal, regulatory or internal policy requirements. However, if you wish to have your Personal Data removed from our databases, you can make such a request by writing to the address set out below in section 10. Subject to any legal or regulatory requirements, we will then delete this information (to the extent technically practicable).

10. How You Can Contact US

Email: Compliance@gwguk.com

Telephone: +44 207 959 6800

Post: New Broad Street House, 35 New Broad Street, London EC2M 1 NH, UK

Please read our regulatory standardised risk warning, including percentage of losses on CFD provider's retail investor accounts on our webpage www.gwguk.com before investing.

If there is any inconsistency among the English version and the versions in other languages of this Agreement, the English version shall apply and prevail.