



AMTF WEBSITE PRIVACY POLICY

Date of last update: May 2022

www.amtfutures.com.uk (our website) is provided by AMT Futures Limited ('we', 'our' or 'us'). We are the controller of personal data obtained via our website, meaning we are the organisation legally responsible for deciding how and for what purposes it is used.

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share any information relating to you (your **personal data**) in connection with your use of our website. It also explains your rights in relation to your personal data and how to contact us or a relevant regulator in the event you have a complaint.

We collect, use and are responsible for certain personal data about you. When we do so we are subject to the UK General Data Protection Regulation (**UK GDPR**).

Given the nature of our website, we do not expect to collect the personal data of anyone under 18 years old. If you are aware that any personal data of anyone under 18 years old has been shared with our website please let us know so that we can delete that data.

Please note that we are not able to offer services to persons resident in the European Economic Area (**EEA**) and we do not expect, therefore, to collect the personal data of anyone resident in the EEA. If you are aware that any personal data of anyone resident in the EEA has been shared with our website please let us know so that we can delete that data.

This privacy policy is divided into the following sections:

- What this policy applies to
- Personal data we collect about you
- How your personal data is collected
- How and why we use your personal data
- Marketing
- Who we share your personal data with

- How long your personal data will be kept
- Transferring your personal data out of the UK
- Cookies
- Your rights
- Keeping your personal data secure
- How to complain
- Changes to this privacy policy
- How to contact us

What this policy applies to

This privacy policy relates to your use of our website only. This policy does not relate to personal data you may provide to us in the course of any contractual relationship you may have with us as a customer; information regarding our use of personal data obtained in the context of that relationship is detailed in the trading account documentation provided to you.

Throughout our website we may link to other websites owned and operated by certain trusted third parties. Those third party websites may also gather information about you in accordance with their own separate privacy policies. For privacy information relating to those third party websites, please consult their privacy policies as appropriate.

We also operate under the trading name OptionsDesk and operate a separate website under that name (www.optionsdesk.com) (the **OptionsDesk website**). This policy does not relate to the OptionsDesk website. For privacy information regarding the OptionsDesk website, please consult the privacy policy published on that site.

Personal data we collect about you

The personal data we collect about you depends on the particular activities carried out through our website. We will collect and use the following personal data about you:

- your name and contact information, including email address and telephone number, if you choose to give this to us
- your gender, if you choose to give this to us
- details of any information, feedback or other matters you give us by phone, email or via the interactive tools on our website
- your activities on, and use of, our website
- information about how you use our website and technology systems

We collect and use this personal data for the purposes described in the section '**How and why we use your personal data**' below.

How your personal data is collected

We collect personal data from you:

- directly, when you enter or send us information, such as when you contact us (including via email) and send us feedback; and
- indirectly, such as your browsing activity while on our website; we will usually collect information indirectly using the technologies explain in the section on '**Cookies**' below

How and why we use your personal data

Under data protection law, we can only use your personal data if we have a proper reason, e.g.:

- where you have given consent
- to comply with our legal and regulatory obligations
- for the performance of a contract with you or to take steps at your request before entering into a contract, or
- for our legitimate interests or those of a third party

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests. We will carry out an assessment when relying on legitimate interests, to balance our interests against your own. You can obtain details of this assessment by contacting us (see '**How to contact us**' below).

The table below explains what we use your personal data for and why.

What we use your personal data for	Our reasons
Providing services to you	To perform our contract with you or to take steps at your request before entering into a contract
To enforce legal rights or defend or undertake legal proceedings	Depending on the circumstances: —to comply with our legal and regulatory obligations —in other cases, for our legitimate interests or those of a third party, i.e. to protect our business, interests and rights or those of others
Customise our website and its content to your particular preferences based on a record of your selected preferences or on your use of our website	Where we are not required to obtain your consent and do not do so, for our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service to you
Communications with you not related to marketing, including about changes to our terms or policies or changes to the services or other	Depending on the circumstances: —to comply with our legal and regulatory

What we use your personal data for	Our reasons
important notices	<p>obligations</p> <p>—in other cases, for our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service to you</p>
Protecting the security of systems and data	<p>To comply with our legal and regulatory obligations</p> <p>We may also use your personal data to ensure the security of systems and data to a standard that goes beyond our legal obligations, and in those cases our reasons are for our legitimate interests or those of a third party, i.e. to protect systems and data and to prevent and detect criminal activity that could be damaging for you and/or us</p>
Updating and enhancing customer records	<p>Depending on the circumstances:</p> <p>—to perform our contract with you or to take steps at your request before entering into a contract</p> <p>—to comply with our legal and regulatory obligations</p> <p>—where neither of the above apply, for our legitimate interests or those of a third party, e.g. making sure that we can keep in touch with our customers about existing and new services</p>
Disclosures and other activities necessary to comply with legal and regulatory obligations that apply to our business, e.g. to record and demonstrate evidence of your consents where relevant	<p>To comply with our legal and regulatory obligations</p>
Marketing our services to existing and former customers	<p>For our legitimate interests or those of a third party, i.e. to promote our business to existing and former customers</p> <p>See 'Marketing' below for further information</p>
External audits and quality checks, e.g. for the audit of our accounts	<p>For our legitimate interests or a those of a third party, i.e. to maintain our accreditations so we can demonstrate we operate at the highest standards</p>
To share your personal data with members of our group and third parties in connection with a	<p>Depending on the circumstances:</p>

What we use your personal data for	Our reasons
<p>significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency</p> <p>In such cases information will be anonymised where possible and only shared where necessary</p>	<p>—to comply with our legal and regulatory obligations</p> <p>—in other cases, for our legitimate interests or those of a third party, i.e. to protect, realise or grow the value in our business and assets</p>

Note that we do not collect categories of personal data requiring additional protections under data protection law (also known as “special category data”).

See ‘**Who we share your personal data with**’ for further information on the steps we will take to protect your personal data where we need to share it with others.

Marketing

We may use your personal data to send you updates by email about our services.

We have a legitimate interest in using your personal data for marketing purposes (see above ‘**How and why we use your personal data**’). This means we do not usually need your consent to send you marketing information. However, where consent is needed, we will ask for this separately and clearly.

You have the right to opt out of receiving marketing communications at any time by:

- contacting us (see ‘**How to contact us**’ below) or
- using the ‘unsubscribe’ link in emails

We may ask you to confirm or update your marketing preferences if you ask us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

We will always treat your personal data with the utmost respect and never sell it to other organisations for marketing purposes.

For more information on your right to object at any time to your personal data being used for marketing purposes, see ‘**Your rights**’ below.

Who we share your personal data with

We routinely share personal data with other third parties we use to help us run our business, e.g. website hosts and website analytics providers.

We only allow those organisations to handle your personal data if we are satisfied they take appropriate measures to protect your personal data.

We or the third parties mentioned above may occasionally also need to share personal data with:

- external auditors, e.g. in relation to the audit of our accounts, in which case the recipient of the information will be bound by confidentiality obligations

- professional advisors (such as lawyers and other advisors), in which case the recipient of the information will be bound by confidentiality obligations
- law enforcement agencies, courts, tribunals and regulatory bodies to comply with our legal and regulatory obligations
- other parties in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency—usually, information will be anonymised but this may not always be possible, however, the recipient of the information will be bound by confidentiality obligations

If you would like more information about who we share our data with and why, please contact us (see **'How to contact us'** below).

How long your personal data will be kept

We will not keep your personal data for longer than we need it for the purpose for which it is used. Different retention periods apply for different types of personal data depending on the circumstances and applicable laws.

When we have no ongoing legitimate business need to hold your personal information, we will either delete or anonymise it. If we can't do this (for example, because your personal information is stored in backup archives), we'll securely store your personal information, only use it for a purpose we've already communicated to you, and isolate it from any further processing until archives are deleted.

Transferring your personal data out of the UK

We will not transfer your personal data outside of the UK unless required by law.

Cookies

A cookie is a small text file which is placed onto your device (e.g. computer, smartphone or other electronic device) when you use many websites. They are widely used in order to make websites work, or work more efficiently, and collect information about how you browse the site, allowing web applications to respond to you as an individual and provide information to the owners of the site. Cookies ensure a consistent and efficient experience for visitors and help web applications to tailor operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We only use "essential" cookies on our website. These are cookies that are required for the operation of our website. As these cookies are essential for the operation of our website, we do not require your consent to their use. However, if you do not want to accept any cookies, you may be able to change your browser settings so that these cookies are not accepted. If you do this, please be aware that you may lose some of the functionality of our website.

For further information about cookies and how to disable them please go to the guidance on cookies published by the UK Information Commissioner's Office, www.aboutcookies.org or www.allaboutcookies.org.

Your rights

You generally have the following rights, which you can usually exercise free of charge:

Access to a copy of your personal data	<p>The right to be provided with a copy of your personal data</p> <p>A more detailed explanation of this right under UK law is available here</p>
Correction (also known as rectification)	<p>The right to require us to correct any mistakes in your personal data</p> <p>A more detailed explanation of this right under UK law is available here</p>
Erasure (also known as the right to be forgotten)	<p>The right to require us to delete your personal data—in certain situations</p> <p>A more detailed explanation of this right under UK law is available here</p>
Restriction of use	<p>The right to require us to restrict use of your personal data in certain circumstances, e.g. if you contest the accuracy of the data</p> <p>A more detailed explanation of this right under UK law is available here</p>
Data portability	<p>The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations</p> <p>A more detailed explanation of this right under UK law is available here</p>
To object to use	<p>The right to object:</p> <ul style="list-style-type: none"> —at any time to your personal data being used for direct marketing (including profiling) —in certain other situations to our continued use of your personal data, e.g. where we use your personal data for our legitimate interests. <p>A more detailed explanation of this right under UK law is available here</p>
Not to be subject to decisions without human involvement	<p>The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you</p> <p>We do not make any such decisions based on data collected by our website.</p>

	A more detailed explanation of this right under UK law is available here
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For further information on each of those rights, including the circumstances in which they do and do not apply, please contact us (see '**How to contact us**' below). You may also find it helpful to refer to the [guidance from the UK's Information Commissioner](#) on your rights under the UK GDPR.

If you would like to exercise any of those rights, please email, call or write to us—see below: '**How to contact us**'. When contacting us please:

- provide enough information to identify yourself and any additional identity information we may reasonably request from you, and
- let us know which right(s) you want to exercise and the information to which your request relates

Keeping your personal data secure

We have appropriate security measures to prevent personal data from being accidentally lost, or used or accessed unlawfully. We limit access to your personal data to those who have a genuine business need to access it. We continually test our systems and are ISO 27001 certified, which means we follow top industry standards for information security.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit <http://www.getsafeonline.org>. Get Safe Online is supported by HM Government and leading businesses.

How to complain

Please contact us if you have any queries or concerns about our use of your information (see below '**How to contact us**'). We hope we will be able to resolve any issues you may have.

You also have the right to lodge a complaint with the Information Commissioner in the UK.

The UK's Information Commissioner may be contacted at <https://ico.org.uk/make-a-complaint> or by telephone: 0303 123 1113.

Changes to this privacy policy

We may change this privacy policy from time to time—when we make significant changes we will take steps to inform you, if we hold your contact details, by email, before we make any changes unless we are required to make the change sooner (for example due to regulatory reasons).

How to contact us

You can contact us by post, email or telephone if you have any questions about this privacy policy or the information we hold about you, to exercise a right under data protection law or to make a complaint.

Our contact details are shown below:

- Address: 55 Bishopsgate, London, EC2N 3AH, United Kingdom
- Email address: info@amtfutures.co.uk
- Telephone: +44 (0) 20 7466 5665