



## PRIVACY NOTICE

This page explains what personal data we collect, why we need that data, and how we use it.

ATFX.ae is the trading name for AT Capital Markets (ADGM) Limited, which is a registered company of address 8<sup>th</sup> Floor, Al Maqam Tower, ADGM Square, Al Maryah, Abu Dhabi, UAE. ATFX is incorporated in Abu Dhabi Global Market (ADGM) and regulated by the Financial Regulatory Authority (FSRA).

### How do we process personal data?

#### Visitors to Our Websites

When you visit our website, we will record details of the pages viewed, frequency and duration of your visits, types of transactions conducted, documents downloaded and other websites which may have referred you or to which you link. We do this as a legitimate interest, to maintain the performance and security of our website. We will delete the data after 2 years if you are not a customer, otherwise we will keep the details with your customer record.

We also use Cookies, which are small files that your internet browser stores to help our website perform correctly. See our Cookie Notice for more details - <https://www.atfx.ae/wp-content/uploads/cookies-policy-ae-en.pdf>.

#### Contacting Us

If you contact us, we will retain your details in order to support your enquiry. If your question directly relates to you becoming a customer, we will add you to our newsletter marketing database for further updates about our products and services, as a "soft-opt-in" legitimate interest. You are free to opt out immediately or at any time. Otherwise, we will delete your contact details when we believe the query has been resolved.

#### Customers

For live account members, we are required by law to conduct checks to prevent financial crime. This requires additional identity information from you, such as passport and funding details. We also check third party financial crime and anti-fraud databases to validate the information.

If any of your details change, please notify us at the earliest opportunity, so we can update our records.

When you make payments to and from accounts, we work with Emirates NBD, Skrill, Neteller and Safecharge, who are the Data Controllers for that payment information. Please see their websites for their privacy notices.

To provide our services, we use Data Processors in UK, Cyprus and Hong Kong, United Arab Emirates under formal contracts. When transferring data outside the ADGM, it is in accordance with the ADGM Data Protection Regulations 2015

We have legal and regulatory obligations to retain your data, including account usage and trade history, for 6 years after you close your account. We may retain some of your data for longer if there are specific legal requirements or on-going discussions.

#### Privacy Notice August-2018

AT Capital Markets (ADGM) Limited

A: 8<sup>th</sup> Floor, Al Maqam Tower, ADGM Square, Al Maryah Island, Abu Dhabi, UAE

T: +971 2 419 2000 E: [cs@atfx.ae](mailto:cs@atfx.ae) W: [www.atfx.ae](http://www.atfx.ae)

Regulated by the Financial Services Regulatory Authority (FSRA) of the ADGM. FSRA Permission Number: 170006.



### **Visitors to Our Offices**

If you visit our offices, you will be recorded by our CCTV cameras. These are provided for physical security of the company, our employees and our visitors, as a legitimate interest. We do not use the recordings for any other purpose and we limit access to the recordings on that basis. We delete recordings in accordance with our security protocols.

### **People We Work With**

We partner with many organizations and retain contact details of people we speak to in those organizations as a legitimate interest. We will delete or restrict use of those details if requested or we believe they are no longer of business value.

### **Job Applicants**

Information that is provided to us will be held as a legitimate interest, to assess the candidate and process the application. Information we will require includes contact details, your curriculum vitae, your previous experience, education, references and answers to questions relevant to the role you have applied for. Our recruitment team and interviewers will have access to this information.

We will also ask about equal opportunities information. We use this information to produce and monitor equal opportunities statistics. There is no obligation to provide this information and it will not affect your application if it is not provided. The information will not be made available to any staff outside of our recruitment team, including hiring managers.

We will only share data with contracted third parties if it is necessary for this recruitment process. We will never sell your data or use it for marketing purposes. If we need to securely process the information in another country, we will let you know before the transfer happens.

If your application is not successful, unless you ask us to retain your information for other opportunities in the future, we will retain your details for six months to help with any questions, before securely deleting or anonymizing the information.

If your application is successful, we will need to complete employment checks for legal reasons, to verify your right to work in the country, and seek assurance as to your trustworthiness, integrity and reliability. We will require proof of your identity, qualifications and references.

### **Employees**

Our HR team and line managers will store your employee details. If any of your details change, please notify HR so that your details can be corrected. For contractual reasons, we will store your details of your salary, tax, bank account and benefits. As a legitimate interest, we will store information about your performance, training, leave, absence, disciplinary action and grievances.

Apart from information required to provide future employment references, we will delete all employee data six years after the contract is terminated, unless there are legal reasons to retain the data for longer.

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## Protecting Personal Data

### Security

Security of personal data is very important to us. Our business uses a wide range of organisational, technical, physical and operational controls, which are assessed for effectiveness on a regular basis.

### Individual's Personal Data Rights

We fully respect your rights to request that we:

- Allow you to opt-out of any process that you previously consented to, at any time.
- Provide a copy of data we hold on you, or to pass it to a third party on your behalf.
- Amend, delete or restrict processing of your data.
- Explain and review any automated decision making or profiling.
- Provide further information about our processing activities.

We will not sell, purchase, provide, exchange or in any manner disclose Account or Transaction data or personal information of or about a Cardholder to anyone, except its Acquirer, Visa/MasterCard Corporations or in response to valid government demands.

If you wish to raise a Data Subject Request or contact us about any another matter, please contact our Data Protection Office at:

- Send an email to [cs@atfx.ae](mailto:cs@atfx.ae).
- Send a letter to our ATFX office: 8<sup>th</sup> Floor, Al Maqam Tower, ADGM Square, Al Maryah Island, Abu Dhabi, UAE

When we receive a request, we will verify your identity and the request, before responding to you within 28 days. We will retain details of your request as a legitimate interest for two years for quality assurance purposes, to deliver on our agreement to you and to help if you have any further questions about the matter.

Please let us know if you are not happy about how we are handling your data. We will do our best to resolve the matter, but if you have further concerns it is your right to make a complaint to:

Office of Data Protection

Email: [Data.Protection@adgm.com](mailto:Data.Protection@adgm.com)

Telephone: +971 2 333 8888

Opening hours: 9:00am to 3:00pm (Sunday to Thursday)

### Our Privacy Notice

Our website provides links to other websites, which are beyond our control. We encourage you to read the privacy statements on the other websites you visit.

This privacy notice was drafted with brevity and clarity in mind. If you would like more details, please let us know. We reserve the right to update our Privacy Notice and Cookie Notice at any time.

We keep our privacy notice under regular review. This notice was last updated August 9<sup>th</sup>, 2018.

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