

Privacy Policy

Maxis Investments Limited is committed to providing you with the highest quality service. This includes maintaining your privacy and protecting your personal data. This policy, read together with our Standard Terms of Business, explains what we and our Group companies do with the personal data we collect about you. We will tell you which companies are in our Group upon request. Our contact details are set out at the end of this policy.

To get the best from our services, please keep your personal data (including your email address) accurate and up to date. You can do this by contacting us at the address or telephone number given at the end of this policy.

Please take the time to read this policy carefully. In opening an account with us and/or providing any personal data to us via MaxisTrader, you acknowledge that your personal data will be used in accordance with our Standard Terms of Business and this policy.

Maxis Investments Limited will be the data controller of your personal data which you provide to us or which is collected by us when you open an account with us or via MaxisTrader (our electronic trading platform).

1. Why have a privacy policy?

Information that identifies or can be used to identify a living individual is known as “personal data.” All organisations processing personal data must do so fairly, lawfully and in accordance with applicable data protection laws including the European Union’s General Data Protection Regulation (**GDPR**). This includes the obligation for us to tell you how we will use your personal data. We treat all of our legal obligations seriously and take all steps necessary to ensure compliance when storing and processing your personal data.

2. What personal data do we collect about you and how?

We may collect the following information about you, from you or third parties, including:

- your contact details such as your name, address, telephone number and email address;
- your date of birth, nationality, country of birth, country of residence, employment status and tax identification number (e.g. National Insurance Number);
- passport details, national identity card, driving licence and address verification documents (e.g. utility bills);
- details of the services you request from us;
- details concerning your financial profile including employment related information; and
- source of wealth information and verification documents.

We collect your personal data in a number of different ways, including the following:

- if you provide it when communicating with us (for example when you complete the application form to open an account with us and when you provide updates via telephone or other electronic communications); and
- if you apply for any of our products or services.

Maxis Investments Ltd

7 Princes Street, 1st Floor, London EC2R 8AQ, UK | **T** +44 207 726 3300 | **F** +44 207 726 3301
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www.maxisinvestments.co.uk

In most cases you are not obliged to provide any personal data to us, but if you have requested information or a service from us, we will not be able to provide it without certain information, such as your contact details. If you have applied for a service from us, it will be a statutory requirement for us to obtain, and a contractual requirement for you to provide, certain information so that we can verify your identity in order for us to meet our obligations under the applicable money laundering regulations and any other applicable legislation for the purposes of crime prevention and credit risk reduction. You are obliged to provide this information in order for us to provide the service and, if you fail to provide it, we may be unable to provide the service.

3 . How do we use your personal data? How long do we keep them for?

We will access and disclose your personal data if we are required to do so by law (or if we reasonably believe we are required to do so by law), and to the extent it is necessary for the proper operation of our systems, to protect us/our customers, or for the enforcement of our Standard Terms of Business.

We retain and use your personal data for the following purposes:

- processing applications made by you, running your accounts, providing our services, contacting you and servicing our relationship with you;
- administration and accounting, billing and auditing, compliance controls and risk management and other legal purposes;
- to carry out checks on you, such as credit assessments, identification verification checks and anti-money laundering checks, for the purposes of meeting our obligations under the applicable money laundering regulations and any other applicable legislation, for the purposes of crime prevention and credit risk reduction;
- dealing with any queries, complaints or problems reported by you;
- enabling you to participate in the interactive features of the website and ensuring content from MaxisTrader is presented in the most effective manner for you and your computer or device;
- notifying you about changes to our service and/ or the terms on which the services are provided;
- to provide you with information about goods or services we feel may interest you in accordance with applicable laws; and
- to provide you with market commentary, research, trade ideas etc.

Unless stated otherwise in this privacy policy, the legal basis for our use of your personal data will be that this information is required for one or more of the legitimate interests described above.

We will only keep your personal data for as long as we need to in order to fulfil the relevant purpose(s) it was collected for, as set out above in this privacy policy and for as long as we are required to keep it by law. We retain copies of our customer contracts in order to enable us to deal with any legal issues along with the information provided to us for identification verification checks and anti-money laundering checks (as required by law) for 6 years after termination or expiry of our contract with you. Details of complaints are retained for 5 years from receipt in accordance with the DISP chapters of the FCA Handbook and telephone call recordings are retained for up to 7 years from the date recorded in accordance with the SYSC chapters of the FCA Handbook. If you have a query in relation to how long we retain your personal data for, please contact us using the contact details provided below.

4. Credit assessment, fraud prevention agencies, regulators and tax authorities

If you apply to open an account with us or where you apply for additional services, we may make searches about you with third parties who may supply us with financial information, for the purposes of credit risk reduction. If you object to us carrying out these searches, we may not be able to provide you with the services you requested from us. We may make periodic searches of our records and those of third parties, to manage your account with us and to make credit related decisions about you, including whether to make an account available or to continue our relationship.

To prevent or detect financial crime, or to assist in verifying your identity in order to fulfil our legal obligations, we may make searches with financial crime screening providers about you. If financial crime is identified or reasonably suspected, details will be passed to financial crime prevention agencies who will record this. Law enforcement agencies may access and use this information.

We may disclose your personal information to third parties, the court service, regulators or law enforcement agencies in connection with enquiries, proceedings or investigations by such parties anywhere in the world or in order to enable us and other relevant Group companies to comply with their regulatory requirements or dialogue with its regulators as applicable.

International regulations regarding the automatic exchange of information require financial institutions to collect and report certain information about an individual's tax residency. We may be legally obliged to pass on your personal information to tax authorities who may, under inter-governmental agreements, exchange this information with tax authorities in other jurisdictions.

5. Whom do we share your personal data with?

We may disclose your personal data to:

- entities within our Group, including Turkiye Is Bankasi A.S. and Is Yatirim Menkul Degerler A.S.;
- third parties which we use to carry out the checks that we need to carry out on you, such as identification verification, anti-money laundering and credit assessment checks,
- other service providers that may be located in or outside the European Economic Area (EEA) such as electronic trading platform providers, sub-custodians; and providers of banking services
- third party to whom we may sell our business.

Please Note: that Maxis Investments Limited is the direct subsidiary of Is Yatirim Menkul Degerler A.S. ("Is Yatirim") and indirect subsidiary of Turkiye Is Bankasi A.S., ("Is Bankasi"), both regulated financial institutions established in and operating mainly from Turkey. We may disclose your personal data to both Is Yatirim and Is Bankasi in the event that they conduct or appoint third parties to conduct audits on us. As Turkey is not a member state of the EEA the protections afforded by the

GDPR (of which this Privacy Policy is a reflection) do not apply to your personal data that are disclosed to Is Yatirim or Is Bankasi. Furthermore, Turkey is currently not acknowledged by the European Union as having data protection rules that are adequate by comparison to those of the European Union.

As a result of the above there is a risk that, insofar as your personal data are disclosed by us to Is Bankasi and Is Yatirim, such personal data will not be afforded the protections set out in this Privacy Policy and the GDPR.

6. Safeguarding your personal data

We take all reasonable care in the collection, storage, processing and disclosure of your personal data and have implemented internal security procedures to minimise the risk that unauthorised parties will be able to access and misuse the information. It is because of these security procedures that we may ask for proof of identity before we disclose any personal information about you. The internet is an open medium and we cannot guarantee that any information you send to us by email or via MaxisTrader will not be intercepted or tampered with.

Any breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted to us or stored or otherwise processed by us will be dealt with by us in accordance with the provisions of the GDPR.

7. Third party links

Please bear in mind that this policy only applies to websites and services operated by us and not those operated by third parties, including MaxisTrader, the electronic trading platform operated by SAXO Bank A/S. Whenever possible we will anonymize your personal data, for example by identifying your account exclusively through a unique client number. Despite such precautions such third parties may acquire from us your personal data (or derive your personal data from anonymised data that we gave them) and possibly pass them on to other persons. We suggest that you make yourself familiar with any privacy policy provided by such third party websites before providing personal information about yourself to us.

The privacy policy of Saxo Bank A/S is available at the following link:

<https://www.home.saxo/legal/privacy-policy/saxo-privacy-policy>

MaxisTrader uses cookies to distinguish you from other users of MaxisTrader. This helps providing you with a good experience when you browse MaxisTrader. For more detailed information on the cookies that are in use and the purpose for which they are used see information about cookies at

<https://www.home.saxo/legal/cookie-policy/saxo-cookie-policy> .

8. Your rights and contacting us

You have the following rights (unless exemptions apply), which can be exercised by contacting our Compliance Officer using the details provided at the end of this document.

The right:

- to ask us that your personal data are not processed for marketing purposes by us or by any third party;
- to access personal information held about you and to obtain a copy of it;
- to prevent any processing of a record of personal data that is causing or is likely to cause unwarranted and substantial damage or distress to you or another individual;
- to obtain the rectification or completion of records of personal data which are inaccurate or incomplete;
- to restrict or object to the processing of your personal data and to request its erasure under certain circumstances. We will not be able to erase personal data where we have a legal obligation to retain such data for example the results of identity verification checks;
- in certain circumstances, to receive your personal data, which you have provided to us, in a structured, commonly-used and machine readable format and the right to transmit that data

to another data controller without hindrance, or to have that personal data transmitted to another data controller, where technically feasible; and

- to lodge a complaint with a supervisory authority about the way in which your personal data is being processed.

Where we rely on your consent to use your personal data, you have the right to withdraw that consent at any time.

If you have any queries about this policy or our use of your personal data, please contact our Compliance Department at compliance@maxisinvestments.co.uk or in writing at:

Compliance Department
Maxis Investments Limited
7 Princes Street
1st Floor
London
EC2R 8AQ
Telephone: +44 207726 33 00