



# Privacy Policy

effective 25/05/2018

At Indigo FX we value your privacy and are committed to protecting your personal data. This policy will inform you how we plan to do so and how the law protects you:

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## **Introduction & Important Information about Us**

This privacy policy sets out how Indigo FX uses and protects any information that you give us when you use this or any of our other websites, our services and products, and should be read together with our General Terms and Conditions.

Indigo FX Ltd is the controller and responsible for your personal data. This website nor our services are intended for children and we do not knowingly collect data relating to children.

## **What information we collect about you**

We collect, store and record information received or about you in electronic or physical form and will hold, use and process it in line with our Privacy Policy and the General Data Protection Regulation (GDPR) (EU) 2016/679. The personal data we collect, and process includes:

- your name
- your Date of Birth
- your Contact information such as email & telephone number
- your usual residential address
- your payment details, for example your bank's name & account number when you make a payment to us

We also collect information in relation to other people where you have provided us with such information, for example the details of the beneficiary where you would like us to send funds to. Where you have provided us such information you confirm that you have been given permission and

have necessary consent to do so and the owners of the personal data are aware of the purpose of processing.

### How we collect your information

By using our services; we collect information about you in several ways, for example when you make a transfer to our account, we can see the account name, number and any other details passed along by the remitter.

Information provided by you to us; such as when you complete our account application form, conversations with your trader on the phone, or when you send us instructions to carry out payments.

We also use information made publicly available, for example information obtained from Companies House.

### How we use your information

We only use your personal data when the law allows and requires us to do so or when you request us to, for us to carry out your instructions and for us to provide our services to you, or where we need to comply with any legal or regulatory obligation.

We have set out the following table to describe all the ways how we plan to use your personal data and the appropriate lawful basis to do so. Please note that we may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your data.

Purpose/Activity	Type of Data	Lawful Basis
To register you with our business	(a) Identity (b) Contact	Performance of a contract with you
To perform any contract with you including: (a) Managing payments, fees and charges (b) Collecting and recovering money owed to us (c) Addressing any breach	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us) (c) Necessary for our legitimate interests (to ensure compliance with contract terms)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent

		fraud and in the context of a business reorganisation or group restructuring exercise)
		(b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

## Record keeping

We will only keep the above information and data for as long as we are required to do so, which is typically 5 years after the termination of the business relationship with us. This includes regular reviewing our files to ensure that information is accurate, up-to-date and still required.

In some circumstances you can ask us to delete your personal data

## Information Sharing

- We may disclose data to provide our services, to respond to legal requirements, enforce our policies, liaise with judicial or regulatory authorities where required under applicable law, and protect our rights and property.
- The personal information you provide to us may also be shared with third party companies, agents, contractors, service providers or related companies, including without limitation:
  - with credit reference agencies to verify your identity or recipients of the money transferred through the service, if this is necessary to provide you with our services, respond to your enquiries or for any other related purposes, and
  - with fraud prevention agencies who may use it to prevent fraud and money-laundering and to verify your identity. Further details of how your information will be used by us and these fraud prevention agencies can be found by contacting us at [info@indigofx.co.uk](mailto:info@indigofx.co.uk) ).

We may also share your personal information with:

- other companies we have instructed to provide services to or for us;
- other third parties for those purposes that may be reasonably ascertained from the

- circumstances in which the information was submitted;
- other business entities, should we plan to merge with, or be acquired by, or be invested in by that business entity, or if we undergo a corporate re-organisation;
- any successor in interest, in the event of a liquidation or administration of Indigo FX Ltd; and
- to any other third party, but only subject to your prior consent.

### **Information Sharing Outside of the UK & International Transfers**

Data that you submit via our site or via your instructions is sent to and stored on secure servers owned by, or operated for, us in the EEA. Data may be transferred to, or stored at, a destination outside the European Economic Area ("EEA") and may also be processed by staff operating outside the EEA who work for us, or for one of our service providers, related companies, agents or contractors. Such transfers may be made in order to operate the service, improve our site, services, or to assist in our security or fraud protection activities.

Where recipients are outside the EEA, we ensure that they provide an adequate level of protection for your personal data or that the transfer is otherwise permitted under applicable Data Protection Legislation, by methods including using standard contractual clauses, binding corporate rules, registration for the Privacy Shield program, or by relying on a relevant adequacy decision by the European Commission or on other legal grounds or conditions, always in accordance with applicable Data Protection Legislation.

Where we feel it is necessary or appropriate we may seek to rely on your consent as the legal basis for transferring your personal data to outside the EEA, however we do not generally do so. Where we do, you may withdraw your consent at any time.

### **Links to other sites**

Our website may contain links to other sites. We do not accept any responsibility for their data policies, procedures or the contents of their site.

Please be aware that advertisers or web sites that have links on our site may collect personally identifiable information about you. This privacy statement does not cover the information practices of those websites. you should exercise caution and look at the privacy statement applicable to the website in question.

### **Information Security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

## Cookies

Our website uses cookies in order to improve your user experience by enabling that website to 'remember' you, either for the duration of your visit (using a 'session cookie') or for repeat visits (using a 'persistent cookie').

What are cookies?

Cookies are tiny text files stored on your computer when you visit certain web pages. A cookie has a name and stores a value. For example, one of the cookies we use is called "advert" and stores the page you were on when you clicked a link to visit our website - it helps us see where our visitors come from.

Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

Please note that cookies can't harm your computer, they are one of the most basic web technologies and are used by millions of websites.

When a cookie is set it, is given an expiration date which is the date that your browser will automatically remove it from your computer.

Third party cookies

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

Blocking cookies

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies as soon you visit our site.

We may use the following cookies:

- Analytical/performance cookies: They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- Functionality cookies: These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- Targeting cookies: These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

Google Analytics

1. \_utma
2. \_utmb
3. \_utmc
4. \_utmz
5. \_utmv
6. \_atuvc

These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.

### **Your rights**

At any time, you have the right to:

- Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw

your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

- No fee usually required You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.
- We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.
- We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated.

### **How to contact us**

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed by email to [info@indigofx.co.uk](mailto:info@indigofx.co.uk) or at Indigo FX Ltd, 30 crown Place, London EC2A 4EB United Kingdom. Alternatively, you may call us on +44(0)20 7856 2467.