



**Royal**  
**Chartered Bankers**

# PRIVACY POLICY

## Introduction

1. This privacy policy covers the website [www.rcbankers.com](http://www.rcbankers.com) and all its related sub-domains and mobile applications that are registered and operated by Royal Chartered Bankers Ltd.
2. The Company outlines in the Privacy Policy (herein the “**Policy**”) how the Company collects, maintains, uses, discloses and safeguards Personal Data.
3. This Policy applies to existing clients, prospective clients, clients who have terminated their contractual relationship with the Company and website visitors (hereinafter jointly referred to as the “**Clients**” or “**you**”) who are accessing or using the Company’s website(s) and mobile applications (hereinafter referred to as the “**Platforms**”)
4. The Company is committed to protecting the privacy of all Clients’ Personal Data. For the purposes of this Policy, references to “Personal Data” shall mean data which identifies or may identify Clients and which may include, for example, a Client’s name, address, identification number, telephone number and date of birth.

## Personal Data Collection

1. The provision of certain Personal Data is required for establishing a contractual relationship with the Company. Clients not wishing to provide such Personal Data will not be able to open an account with the Company or to receive with other products and/or services of the Company.
2. The Company collects different types of Personal Data through the Company’s Platforms from Clients who visit such Platforms or access, use or request products and services offered by the Company.
3. Clients have a responsibility to ensure that the Personal Data they provide to the Company and recorded in their personal account remains accurate and up to date throughout the period of their contractual relationship with the Company.
4. In addition to the information provided by Clients, the Company also lawfully collects and processes Personal Data from publicly available sources (including, inter alia, the press, social media and the internet) and third-party risk management software solutions in order to meet its regulatory obligations and for confirming the validity of the provided information.
5. The following Personal Data may be collected from Clients depending on the product and/or service the Company provides to him:
  - Contact details such as the Client’s name, e-mail address and phone number

- Identification details such as the Client's identification or passport number
- Biographical and demographic data such as gender, age, education, occupation, the Client's financial trading experience
- Financial information such as the Client's income status, bank account number and account details, tax information and other financial information
- Information relevant to the services that the Company provides to the Client such as the Client's transactions and communication records with the Company
- Details of visitors' and Clients' visits to the Company's website and information collected through cookies and other tracking technologies including IP address and domain name, browser version, operating system and geolocation
- marketing preferences
- Information in relation to criminal convictions and offences

## Child's Data Collection

1. The Company's service are not intended for children under eighteen (18) years of age nor is the Company's website designed for use by children. Therefore, the Company does not or specifically collect children's personal data. If the Company collects such data mistakenly or unintentionally, the Company shall delete the information at the earliest possible once it obtains knowledge thereof.

## Personal Data Use

1. The Company collects and processes Personal Data, which are required for the evaluation, establishment and maintenance of the contractual relationship between the Company and the Client and in order to comply with applicable Data Protection Legislation and applicable laws and regulations governing the provision of financial services.
2. The Company may also process the Client's Personal Data to pursue its legitimate interests or those of third parties, if the Clients' interests and fundamental rights are not overridden by those of the Company or the third party.
3. The Client's Personal Data will most commonly be used in the following circumstances:
  - a) Where the Company needs to perform the contract it has entered with the Client or in order to take certain steps prior to entering into a contract with the Client. Processing is necessary for the Company in order to provide the Client with its products and services, and more specifically in order:
    - To verify the Client's identity and carry out any required credit checks

- To ensure that the Client meets the suitability requirements to use the Company's products and services
  - To manage the any account(s) the Client holds in the Company
  - To process the Client's transactions
  - To send to the Client any information about transactions/post-transactions services
- b) Where the Company needs to comply with a legal obligation. As an investment firm, the Company is required to comply with certain legal and regulatory obligations, which may involve the processing of Personal Data. Such obligations and requirements impose on the Company necessary data processing activities for identify verifications, compliance with court orders, tax law or other reporting obligations and anti-money laundering controls.
- c) Where the Company has legitimate interests to use the Client's Personal Data, the Company may process the Personal Data for the following purposes:
- To identify, prevent and investigate fraud and other unlawful activities, unauthorized transactions and other liabilities and manage risk exposure
  - To defend, investigate or prosecute legal claims
  - To manage its business operations and comply with internal policies and procedures
  - To develop or enhance its products and services
  - To maintain its accounts and records
  - To enhance the security of the Company's network and information systems
  - To receive professional advice (such as legal advice)
  - For the analysis of statistical data which helps the Company in providing its Clients with better products and services in the future. It should be noted that the Company aggregates such data so that they do not directly or indirectly reveal the Clients' identities. The Company may provide this statistical data to third parties solely for statistical purposes and in an effort to improve the Company's marketing campaigns.
- d) Where the Client has given his consent. The Company will only ask for the Client's consent when the Company wishes to provide marketing information to its Clients in relation to its products or services, which may be of interest to the Client.

## Cookies

1. A cookie is a small text file that is stored on a user's computer for record-keeping purposes. The Company uses cookies on its website(s). The Company does link the information that it stores in cookies to any Personal Data the Client submits while

- accessing the Company's website(s).
2. The Company uses both session ID cookies and persistent cookies. A session ID cookie does not expire when the Client closes his browser. A persistent cookie remains on the Client's hard drive for an extended period.
  3. The Company sets a persistent cookie for statistical purposes. Persistent cookies also enable the Company to track and target the location and the interests of its users and to enhance the experience of its services on the Company's website(s).
  4. Some of the Company's business partners use cookies on the Company's website(s) The Company has no access to, or control over these cookies.
  5. Cookies by third party providers are used on our websites to enable tools and services to our visitors and clients and support our internal analytical and marketing activities. The Company has no access to, or control over these cookies therefore will not be liable for misuse or loss of personal information resulting from cookies on the Company's website(s) that the Company does not have access to or control over.
  6. The Client or visitor of the Company's website acknowledges that he can control and manage the above cookies through his web browser security and privacy settings. If you would like to learn out more about cookies as well as how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org) .

## Other Websites

1. The Company's website contains or may contain links to other websites or social media platforms of interest. However, once you have used these links to leave the Company's website, you should note that the Company does not have any control over those other websites. You should exercise caution and look at the privacy statement applicable to the website in question.
2. The Company will not be liable for the unlawful or unauthorized use of the Client's Personal Data due to misuse and/or malicious use and/or negligence and/or misplacement of the Client's passwords by either him or any third party.

## Personal Data Sharing and Disclosure

1. In the course of the performance of the Company's contractual and statutory obligations, the Client's Personal Data may be disclosed to third parties. Most of such third parties enter into contractual arrangements with the Company by which they observe data protection and confidentiality according to applicable Data Protection Legislation.



2. Under the circumstances referred to above, recipients of Personal Data may be, for example but not limited to:
  - a) third party payment service providers who help the Company provide its Clients the services of secure deposit and withdrawal to and from a Client's account
  - b) other service providers that the Company has chosen to support it in the effective provision of its products and services by offering technological expertise, solutions and support
  - c) credit reference and fraud prevention agencies, third party authentication service providers and other financial institutions for the purposes of credit checking, fraud prevention and anti-money laundering controls
  - d) external consultants including legal and tax consultants
  - e) market research companies and call centers
  - f) affiliates and agents of the Company
3. The Company takes appropriate technical and organizational safety measures with its third party service providers for the protection of such Personal Data.

## Business Transfers

1. If the Company is involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of company assets, or transition of service to another provider, Client's Personal Data and other information may be transferred to a successor or affiliate as part of that transaction along with other assets.
2. The Company takes appropriate technical and organizational safety measures with its third party service providers for the protection of such Personal Data.

## Marketing

1. The Company may process Personal Data to tell its Clients about products, services and offers that may be of interest to the Client.
2. If the Client no longer wishes to receive any promotional communications, he may opt-out of receiving them by following the instructions included in each communication or by updating his email subscription preferences within the Client account area.

## Security of Personal Data

1. Personal Data which the Company holds is to be treated by the Company as confidential and will not be used for any purpose other than those specified in this Policy
2. Any Personal Data that the Client provides to the Company will be treated as

confidential and shared only with the parties set out in Section “Personal Data Sharing and Disclosure” section of this Policy.

3. Any Personal Data will not be disclosed to any other third party except if such disclosure is required under any regulatory or legal proceedings.
4. The Personal Data that the Client provides in connection with registering as a user of the website(s) or for the Services is classified as Registration Information. The Company offers high protection of the Registration Information provided by the Client. The Client can access his Registration Information through a password selected by him, which is encrypted and known only to the Client. The Client must be careful and protect his password from any third parties. Registration Information is safely stored on secure servers that only authorized personnel have access to via password.
5. Personal Data provided to the Company that is not Registration Information also resides on secure servers and is again accessible only to authorized personnel via password. This information is not accessible by the Client.

## Amendments of the Policy

1. The Company reserves the right to review and amend this Policy from time to time for any reason and notify the Clients of any such amendments accordingly by posting an updated version of this Policy on the Company’s website(s). The Company will notify you about any material changes to this Policy by placing a notice on its website or by communicating with you directly.
2. The Client is responsible for regularly reviewing the Policy and any amendments thereof.