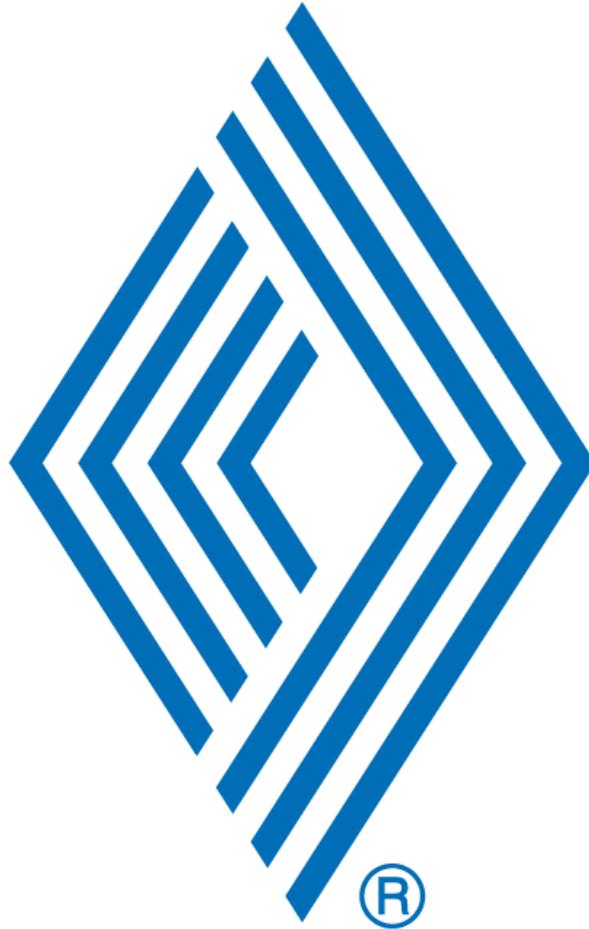


VANTAGE GLOBAL PRIME LLP



Privacy Policy



Our Commitment

Vantage Global Prime LLP (the Firm) is authorised and regulated by the Financial Conduct Authority for the conduct of investment business.

As part of our day-to-day business, we need to collect personal information from our customers and potential customers to ensure that we can meet their needs for a range of financial services and provide them with information about our services.

The Firm fully respects your right to privacy and is committed to protect the privacy of your personal and financial information. This policy confirms how the Firm manages the information provided by you or a third party in connection with its provision of services to you, or which it collects from your use of its services via their website.

If you have any questions about this policy or how the Firm collect and use personal information about you, please contact us using the contact details below.

Vantage Global Prime LLP
Birchin Court
20 Birchin Lane
London EC3V 9DU

Telephone: +44 207 043 5050

Email: compliance@vantageprime.co.uk

Data Protection Law

Data protection law says that the personal information the Firm holds about you must be:

- Used lawfully, fairly and in a transparent way;
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
- Relevant to the purposes we have told you about and limited only to those purposes;
- Accurate and kept up to date;
- Kept only as long as necessary for the purposes we have told you about;
- Kept securely.

Personal information we collect

If you are an actual or potential client, the Firm may collect the following types of information about you:

- Name, address and contact details;
- Date of birth and gender;
- Information about your income and wealth;
- Profession and employment details;
- Location data;

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- Trading performance;
- Any other similar information.

The Firm obtains this information in several ways through your use of its services or other dealings with it, including through the Firm's website, account opening applications, the Firm's demo sign-up forms and in the course of ongoing customer service correspondence.

The Firm also keeps a record of your trading behaviour, including a record of:

- Products you trade with it and their performance;
- Historical data about the trades and investments you have made, including the amount invested; and
- Your preference for certain types of products and services.

The Firm may record any communications, electronic, by telephone, in person or otherwise, that it may have with you in relation to the services provided to you and the Firm's relationship with you. These recordings will be the sole property of the Firm and will constitute evidence of the communications between us. Such conversations may be recorded without the use of a warning tone or any other further notice.

How we collect and store information

The Firm's use of information is a function of what you provide and what is necessary to carry out some of its services for you. At all times, the Firm will only process an appropriate amount of your relevant information and in line with your rights.

Information will be collected and held when you complete an online application or other type of form or access and trade on your account through the website or another service provided to you. The information you give the Firm may include (but is not limited to) your name, address, date of birth, passport number, tax identification number, email address, telephone number, employment and income information, transaction history and financial statements.

The Firm's website uses cookies which enable clients or visitors to the site ("users") to navigate around the website and, where appropriate, to enable the Firm to tailor the content to fit the needs of users. Cookies also provide the Firm with generic statistics enabling it to improve the website and to provide you with information about products and services which may be of interest to you. This does not affect your right to opt-out from receiving marketing material.

Most browsers are initially set-up to accept cookies, but you can change your cookie preferences if you wish. Your navigation of the client login area may also be less efficient if your browser is set to disable persistent cookies (i.e., those which remain permanently on the cookie file of your computer).

Please visit <http://www.allaboutcookies.org/manage-cookies/> for more information on how cookies work and how they may be managed.

The Firm's headquarters are based in the United Kingdom with a main data centre located in the United Kingdom. However, where required to perform its contract with you, or for its wider

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business purposes, the information that the Firm holds about you may be transferred to, and stored at, a destination outside the United Kingdom and the EU.

You acknowledge and agree that your personal information may be transferred within or outside the European Economic Area (EEA). Please note, the Firm will only transfer personal information to organisations outside the EEA if it has assessed the organisation as having appropriate controls and safeguards in place to protect your personal data.

Reasons for collecting personal information

The Firm collects certain personal information so that it may meet the needs of its clients. The Firm will use this information for the following purposes:

To verify your identity and establish and manage your account

The Firm will need to verify your identity to set you up as a customer and it will need to use that information to effectively manage your account with the Firm to make sure that you are getting the best possible service.

This could include third parties carrying out credit or identity checks on behalf of the Firm, for the specific purpose of anti-money laundering, credit assessment, identity verification and fraud prevention.

The Firm has a legal obligation to comply with certain “Know Your Customer” regulatory obligations and therefore it is in the Firm’s legitimate interest to gather this information. As part of the “Know Your Client” on boarding process, for UK based clients a Full Electoral Roll search occurs, and credit reference agencies place a “soft footprint” search on your electronic file.

To provide you with products and services and to review your ongoing needs

When you open an account with the Firm, it will use your personal information to perform its services and comply with its obligations to you. The Firm also has an obligation to make sure it is providing the best products and services to you and may therefore periodically review your needs to ensure the products and services you receive from the Firm are still the best for you.

To investigate or settle enquiries or disputes

The Firm may need to use personal information collected from you to investigate issues and/or settle disputes with you.

To comply with applicable law or regulatory authorities

The Firm may need to use your personal information to comply with applicable law, court order or other judicial process, or the requirements of any applicable regulatory authority.

Data Analysis

The Firm’s web pages and emails may contain tags or other similar type of data analysis tools which allow it to track receipt of correspondence and to count the number of users that have visited their webpage or opened its correspondence. Where your personal information is not in an anonymised

form, it is in the Firm's legitimate interest to continually evaluate that personal information to ensure that the products and services it provides are relevant to the market.

Marketing by us

The Firm may use your personal information to send you marketing communications by email, phone or other agreed forms to make sure you are always kept up to date with its latest products and services.

You may tell us if you do not wish to receive marketing material by emailing the Firm at compliance@vantageprime.co.uk. The Firm will process this information fairly and lawfully and will store this information in accordance with relevant data protection legislation.

Record Keeping

The Firm may need to process your personal information for record keeping purposes. Such processing is required to comply with its legal obligations and may include any communications that it has with you in relation to the services provided to you and the Firm's relationship with you. The Firm will also keep records to ensure that you comply with your obligations under any contract you have entered into with it.

Corporate restructuring

If the Firm undergoes a corporate restructure or part or all of its business is acquired by a third party, it may need to use your personal information in association with that restructure or acquisition. Such use may involve disclosing your details as part of a due diligence exercise. The Firm will only use your information in this way provided it complies with any legal obligation it has to you.

Security

To maintain a safe and secure working environment, should you enter the Firm's premises, the Firm may record your image on its CCTV for security reasons. The Firm may also take your details to keep a record of who has entered their premises on any given day.

Sharing your personal information with third parties

The Firm may be required to provide your personal information to the Financial Conduct Authority and other regulatory and government bodies from time to time in the UK and other countries.

The Firm may also disclose your personal information to:

- Financial institutions and other similar organisations that it deals with in the course of its corporate activities, or those that are nominated by you;
- External service providers (which may be located overseas) that provide services to the Firm;
- Any organisation at your request or any persons acting on your behalf, including your financial adviser, broker, solicitor or accountant;

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- Any third parties where this is necessary to process a transaction or provide services which you have requested; or any authority to whom the Firm are required to disclose such information by law.

Your Rights

Data protection law gives you a number of rights when it comes to personal information we hold about you. These are listed below.

Clear, transparent and easily understandable communication

We must provide in a clear, transparent and easily understandable way how we use your personal information and about your rights. This policy provides that information. The key rights are set out below.

Access to Personal Information

You can ask us the Firm if it is processing your personal information and obtain from it a copy of that personal information.

Rectification of Personal Information

If the personal information the Firm holds about you is inaccurate or incomplete, you are entitled to have it rectified.

Removal of Personal Information

You can ask the Firm to delete or remove your personal information in certain circumstances, such as where the Firm no longer needs it, or you withdraw your consent (where applicable), provided that the Firm has no legal obligation to retain that data.

Such requests will be subject to any retention limits the Firm is required to comply with in accordance with applicable laws and regulations.

Transfer of Data

Under the General Data Protection Regulation (GDPR), you have the right, in certain circumstances, to obtain personal information you have provided the Firm with and to reuse it elsewhere or ask the Firm to transfer this to a third party of your choice.

Objection

You can ask the Firm to stop processing your personal information, and it will do so, if the Firm is:

- Relying on its own or someone else's legitimate interests to process your personal information, except if we can demonstrate compelling legal grounds for the processing; or
- Processing your personal information for direct marketing.

Please note, this will not stop the Firm from storing your personal information.



Restriction

You can request a restriction of the processing of your personal information. This enables you to ask the Firm to suspend the processing of personal information about you.

Withdrawal of consent

In the limited circumstances that the Firm is relying on your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time.

Once the Firm has received notification that you have withdrawn your consent, it will no longer process your information for the purposes you originally agreed to, unless the Firm has another legitimate interest in doing so.

Lodge a complaint

If you think that the Firm is using your information in a way which breaches data protection law, please contact the Firm in the first instance using the contact details above. You also have the right to raise a complaint with your national data protection supervisory authority (if you are in the United Kingdom, this will be the Information Commissioner's Office).

Data Security

The Firm takes security very seriously and adopts industry and information security best practices to protect your personal information. Measures include strong authentication mechanisms and secure access to machines and data.

The Firm has put in place appropriate internal security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, the Firm limits access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. It will only process your personal information on the Firm's instructions and they are subject to a duty of confidentiality.

Your consent

By accessing this website, or other services the Firm provides to you, you consent to the Firm collecting, maintaining, using and disclosing personal information about you and provided by you or by another person as described in this policy.

Amendments to Policy

From time to time, the Firm may make changes to this Privacy Policy for any reason and will notify you of such changes by posting an updated version of this policy on this website, or where appropriate, by email.

You are responsible for regularly reviewing this Privacy Policy and if you use this website or other service the Firm provides to you after any changes are published, any such use shall constitute your agreement to those changes.

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