



# PRIVACY POLICY

We are committed to protecting the privacy of all visitors and users of this website. Please read the following privacy policy to understand how we use and protect the information that you provide to us. We will only use your personal information in accordance with this privacy policy. We are bound by the Data Protection Principles which form the core framework of the General Data Protection Regulation (GDPR).

By using this website, you consent to us using your personal information as set out below.

## PROCESSING OF PERSONAL DATA

Delta Financial Markets Limited (“DF Markets”) is committed to ensuring the privacy of non-public information and personal data provided by all clients of the company as well as all visitors to and users of the website [www.dfmarkets.co.uk](http://www.dfmarkets.co.uk) (the website).

Please read the following Privacy and Personal Data Protection Policy (the “Policy”) to understand how DF Markets collects, uses, discloses, and protects the non-public information and personal data provided by you.

DF Markets will only use the non-public information and personal data it gathers in accordance with this Policy and the relevant regulation.

Your personal data shall be processed by Delta Financial Markets Limited (also trading as DF Markets), whose business address is at 5 Harbour Exchange Square, London E14 9GE, United Kingdom. DF Markets is registered as a Data Controller with the Information Commissioner’s Office (ICO) which is the UK’s independent body set up to uphold information rights.

Information Commissioner’s Office (ICO) is headquartered at the address of Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF, United Kingdom. Telephone: 0303 123 1113 or 01625 545745; Fax: 01625 524510; Website: [www.ico.org.uk](http://www.ico.org.uk)

Your data will also be processed by DF Markets’ parent company Deltastock AD in Sofia, Bulgaria, (on behalf of DF Markets) in its capacity as a Data Processor for DF Markets under the GDPR. Deltastock AD is a MiFID, full-scope licensed, EU financial investment firm which is subject to and bound by the General Data Protection Regulation.

## Data Protection Officer Contact Details

You can contact our Data Protection Officer at:

Phone: +44 (0) 20 3866 9652

Email: [compliance@dfmarkets.co.uk](mailto:compliance@dfmarkets.co.uk)

Address: 5 Harbour Exchange Square, London E14 9GE, United Kingdom

## COLLECTION OF PERSONAL DATA

If a prospective client decides to apply to open a trading or financial spread betting account with DF Markets (Delta Financial Markets Limited), there are certain data or information that will be required from them. This information includes, but is not limited to, personal data such as name, address, date and place of birth, phone number, other contact details, passport details, citizenship and tax status information, employment details, as well as other relevant financial information which we are required under the Law to collect from you and process in the discharge of our regulatory obligations. The purpose for the collection of this information is to identify the prospective client and to assess whether the service requested by them would be appropriate, in light of their specific circumstances, before entering into an agreement (contract) with DF Markets.

Occasionally, DF Markets may request further information for the purposes of both helping further improve the services it provides and in order for the company to be able to personalise the content and experience of the user on DF Markets' website.

DF Markets collects personal data from the following direct sources:

- ✓ online/paper application form for opening an account for trading in financial instruments;
- ✓ documents required for the opening of an account for trading in financial instruments;
- ✓ transactions made online in relation to the provision of services by DF Markets to the client under the performance of the contract between these two parties;
- ✓ required declarations in relation to the automatic exchange of financial information for tax purposes with the HM Revenue and Customs (HMRC), Financial Conduct Authority (FCA) and other third parties as may be required by the law;
- ✓ email, online chat correspondence as well as telephone communication between DF Markets and the client;
- ✓ visits to DF Markets' website;
- ✓ Internet Protocol (IP) address;
- ✓ browser type;
- ✓ operating system;
- ✓ Internet Service Provider (ISP);
- ✓ banner/text ads viewed, etc.

DF Markets collects information indirectly through the use of cookies, which are addressed further below in this Policy.

To ensure the security of transfer of information and personal data, DF Markets uses an SSL certificate to encrypt information transmitted by or to the visitor through the website.

## Special Categories of Data being Collected and Processed – Sensitive Data

In order to meet statutory requirements and in the discharge of its duties under the regulatory system in relation to, among others, anti-money laundering, counter-terrorist financing, anti-fraud and, more generally, anti-financial crime measures, DF Markets collects and processes personal data that may be considered to a certain extent as information about your political views. This represents a special category of personal data under Regulation 2016/679 (the GDPR) and is termed as 'sensitive data'.

## USE OF INFORMATION AND THE PURPOSES OF PROCESSING OF PERSONAL DATA

DF Markets uses the non-public information containing personal data which is being collected from clients in order to administer the client's account for trading in financial instruments and to provide services in that regard.

DF Markets will use the data collected from the client to establish their identity in accordance with the applicable law and regulations, as well as to enter into an agreement/contract with the client for the provision of the requested by the client services that are being offered by the company. The data collected will also be used to classify the client as a professional or non-professional/retail client – and, in that regard, to provide them with the legally established set of documents and other information, as well as to determine the client's tax status for the purposes of the automatic exchange of financial information in the field of taxation.

Unless the client has been notified otherwise, the personal data that DF Markets holds and processes is also used for:

- ✓ reviewing the client's ongoing needs;
- ✓ AML (anti-money laundering), CTF (countering terrorist financing), Fraud, Market Abuse and other Financial Crime prevention;
- ✓ enhancing customer service and relevant products;
- ✓ providing ongoing information that DF Markets believes may be of interest to the client.

## Grounds for Processing Client's Personal Data:

The processing of client's personal data is required in the conduct of our business as a regulated financial investment firm for the purposes of us being compliant with, among others, the following acts, rules and regulations, as amended:

- ✓ the FCA Handbook of Rules and Guidance;
- ✓ the Financial Services and Markets Act (FSMA) 2000;
- ✓ the Proceeds of Crime Act (POCA) 2002;
- ✓ the Serious Organised Crime and Police Act (SOCPA) 2005;

- ✓ the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (MLR 2017);
- ✓ the Criminal Justice Act (CJA) 1993;
- ✓ the Terrorism Act (TA) 2000
- ✓ the Counter-Terrorism Act (CTA) 2008;
- ✓ the Bribery Act (BA) 2010;
- ✓ the Market Abuse Regulation (MAR);
- ✓ The Criminal Finances Act (CFA) 2017.

## DISCLOSURE OF INFORMATION

DF Markets does not disclose client's personal data to any non-affiliated third parties or to affiliated entities, except as stipulated in this Policy and permitted by the applicable law.

Depending on the product or service concerned and with particular restrictions on confidential information, personal client data and information may be disclosed to:

- ✓ service providers and specialist advisers who have been contracted to provide DF Markets with administrative, financial, legal, research, or other services;
- ✓ courts, law enforcement and regulatory authorities, in accordance with or as prescribed by law;
- ✓ anyone duly authorised by the client, as specified by that individual in writing or under a contract.

## ACCESS TO INFORMATION

Any client, after submitting a written request, is entitled to access the personal data collected about them by DF Markets. In the cases whereby the right of access granted to an individual may also lead to disclosure of personal data of third parties, DF Markets is obligated to provide to the relevant client access only to the part of the data referring solely to them. When exercising their right of access, any client of DF Markets is entitled to request at any time:

- ✓ a confirmation as to whether or not data relating to them is being processed, information as to the purposes of such processing, the categories of data concerned, and the recipients or categories of recipients to whom the data is disclosed;
- ✓ a notification to the client, in an intelligible form (set out in an understandable way and in plain English), containing their personal data which is being processed, as well as any available information about their source;
- ✓ information concerning the logic involved in any automated processing of personal data.

Any client is entitled to request at any time from DF Markets to:

- ✓ erase, rectify or block their personal data which processing does not comply with the legal requirements;
- ✓ notify any third parties to whom their personal data have been disclosed of any erasure, rectification or blocking carried out in compliance with the previous item, unless this is impossible or involves a disproportionate effort.

At any time while DF Markets stores or processes their personal data, the client is entitled to:

- ✓ request a copy of their personal data from DF Markets, as well as have a right of access to their personal data at any time;
- ✓ request from DF Markets their personal data in a form convenient for transfer to another data controller, or request that DF Markets does so without unreasonable delay;
- ✓ request from DF Markets to correct, without unreasonable delay, inaccurate personal data, as well as data that is no longer up-to-date;

At any time, the client has the right to raise a complaint directly with the Information Commissioner's Office (ICO), contact details provided further above in this Policy.

The client has the right to request that DF Markets deletes the personal data without undue delay, in any of the following circumstances:

- ✓ the personal data is no longer needed for the purposes it was originally collected for;
- ✓ when they have withdrawn their consent and the processing of data has been based solely on that consent;
- ✓ when they have objected to the processing of personal data, provided DF Markets has no legitimate reason for continuing processing and/or storing the data;
- ✓ when the processing has been established to be unlawful;
- ✓ when the personal data must be deleted in order to comply with a legal obligation under the EU law or UK law that applies to DF Markets in its capacity of data controller;
- ✓ when the personal data have been collected in connection with the provision of services to the information society.

DF Markets may decline to delete client's personal data due to any of the following reasons:

- ✓ when exercising the right to freedom of expression and the right to information;
- ✓ to comply with a legal obligation of DF Markets or to discharge a duty which is in the interest of society/the public;
- ✓ due to public interest considerations in the field of public health;
- ✓ for the purposes of archiving in the public interest, for scientific or historical research, or for statistical purposes, as far as erasure is likely to make it impossible or to seriously prejudice the achievement of the purposes of such processing; or for the establishment, exercise or protection of legal claims.

The client may request that DF Markets restricts the processing of their personal data, in which case the data will only be stored but not processed. The decline of restriction will be explicitly only in writing and DF Markets is obliged to justify any such refusal with a legitimate reason;

- ✓ the client has the right to withdraw their consent for processing of the personal data at any time by submitting a separate request to the data controller, i.e. DF Markets;
- ✓ the client may object to certain types of processing, such as direct marketing (unsolicited advertising messages);
- ✓ the client has the right to object to the automated processing, including profiling;
- ✓ the right not to be the subject of a decision based solely on automated processing involving profiling;

In the event that DF Markets needs to use the personal data for a new purpose, different from the original one, DF Markets will provide to the client a new data protection notice and, if necessary, it will require a prior consent for the new processing.

If the client wishes to exercise any of the rights listed above, they should inform the company in writing. In that case, DF Markets may not be able to provide them with information about services and/or products requested by them, and also the products and services themselves; and with regard to this, DF Markets will have no liability to the client in respect of the same.

## UPDATING OR DELETING CLIENT DATA

The client should inform DF Markets in a timely manner that their personal data have changed by providing their updated data through the **My Account** section on DF Markets' website.

The client should inform DF Markets if they wish the company to delete their personal data by sending an email to [compliance@dfmarkets.co.uk](mailto:compliance@dfmarkets.co.uk).

DF Markets will change or delete client's personal data according to their instructions, unless it is prevented from doing so by the law or for the purposes of discharging its relevant duties for the performance of an effective contract with the client in relation to the provision of services to the latter.

## COOKIES AND IP ADDRESSES

In order to maintain the smooth operation of the website and to be able to provide and enhance its usability by the client, in relation to the client's user experience on DF Markets' website, as well as to improve the services that are being offered to the client, DF Markets uses cookies and IP addresses.

Cookies are information packages sent by the web server to the user's or client's internet browser. These are then sent back by the browser each time it accesses the same server. These information packages are saved and stored on the user's or client's computer by the Internet browser. Cookies provide operational information which can be used to improve the user's interaction with the website.

There are two main types of cookies:

- ✓ **Transient (or per-session) cookies** – these only exist for the duration of the user's website visit and are deleted on exit. These cookies recognise the user as they browse among the website pages; for example, recording items added to an online shopping basket. These cookies also help maintain security.
- ✓ **Persistent (or permanent) cookies**– these stay on the user's computer until expiry or deletion. Many feature a built-in automatic deletion date to help ensure the computer's hard drive does not get overloaded. These cookies often store and re-enter login information, so the user does not need to remember their login details.

DF Markets informs website visitors and its clients that it uses Google Analytics and Facebook to analyse website use and in order to be able to personalise the adverts. Google Analytics and Facebook generate statistical and other website and user information via cookies which are stored on the user's device. The information gathered in connection to the website is used to generate reports on its use and the effectiveness of the advertising campaigns. This information is stored by Google and Facebook.

Google's Privacy Policy can be found at: <https://policies.google.com/privacy>

Facebook's Cookies Policy can be found at: <https://www.facebook.com/policies/cookies/>

#### **DF Markets uses cookies to:**

- ✓ gather information about the navigation across the website of both website visitors and clients;
- ✓ maintain client and user security on the website;
- ✓ store login details for the website;
- ✓ temporarily store data input into the calculators, tools, illustrations, and demonstrations that are provided by the company on the website;
- ✓ store information about users' marketing and product preferences, that helps to improve the marketing strategy;
- ✓ store information about users' dwell time on the website;
- ✓ evaluate the website's advertising and promotional effectiveness (the data collected by DF Markets is anonymous, and is not shared with any third parties).

DF Markets uses both its own (first party) and partner companies' (third party) cookies to support these activities.

DF Markets does not use cookies to track users' and clients' Internet usage after leaving the website and does not store information that third parties could read or track. DF Markets will not exchange, sell, or lease cookie information without the express prior consent of the users.

The table below lists the cookies DF Markets uses along with their purpose:

Name	Purpose	More Information
testcookies	This cookie represents whether the user or client has enabled cookies on their browser or not.	<a href="http://www.aboutcookies.org">www.aboutcookies.org</a>
ASP.NET_sessionId	These cookies ensure the website content is personalised to your preferences. They allow our web servers to respond to your actions on our website	<a href="#">Visit Microsoft website</a>
_utma _utmb _utmc _utmd _utmz	These cookies are used to collect information about how visitors use our site, which we use to help improve it. 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.	<a href="#">Click here for an overview of privacy at Google</a>
lBref	These cookies allow us to track traffic from our affiliate websites	
timeDiff	This cookie is used to store your time zone.	
userCountry	This cookie is used to store your language preferences.	
slidercookie	This cookie is used to store a certain state of the website.	

### Changing Cookie Settings

To enable or disable cookies, it is necessary to follow the instructions provided by the web browser that are usually located within the 'Help', 'Tools' or 'Edit' menus. Alternatively, an external resource

is available at [www.allaboutcookies.org/manage-cookies](http://www.allaboutcookies.org/manage-cookies), providing specific information about cookies and how to manage them to suit the user's preferences.

Users and clients must be aware that should they choose to disable cookies in their browsers, they may not be able to access secure areas of the website; for example, online accounts.

### **Secure Online Services**

Any secure online services the user or client has subscribed to with DF Markets may use cookies in order to enable information about the user and their preferences to be stored, and to also prevent unauthorised access to those services and information. In such circumstances, cookies must usually be accepted and enabled within the browser, otherwise DF Markets cannot ensure that the user's or client's information is secure. This is why users disabling cookies cannot use the secure online services, for instance.

### **IP Address**

An IP address is a unique number that identifies the user's or client's computer while connected to the Internet. IP addresses are not linked to personal postal addresses. Besides the purpose of identification of the user's or client's computer, DF Markets also uses IP addresses to analyse overall user behaviour and preferences on the website.

### **Protection of Information**

Clients' non-public information and personal data are kept in a secure and strictly confidential manner; they are accessed and used only by employees who service the client's account, as well as by employees who exercise control functions.

DF Markets uses advanced security software and technology to ensure a safe and secure trading environment and to protect clients' non-public personal, financial and trading information.

DF Markets encrypts all client personal data in order to be able to protect these data to the fullest extent possible.

### **OPT-OUT PROCEDURE**

It is DF Markets policy not to disclose non-public client information to third parties, except in legally defined cases.

The client has no obligation to provide any part of their non-public information or personal data that may be requested by DF Markets.

The client's refusal to provide the information or/and personal data requested by DF Markets may result in DF Markets being unable to open or maintain the client's account for trading in financial instruments, or to provide financial services to them.

## **AMENDMENTS TO THE PRIVACY AND DATA PROTECTION POLICY**

Any changes to this Policy will be published promptly on DF Markets' website and will be notified to clients.

## **CONSENT**

By agreeing to accept this Privacy Policy, the client/website user consents to DF Markets to process their personal data only for the purposes stated in this Policy.

The consent is necessary for DF Markets to be able to process both types of personal data (ordinary and special), but it needs to be explicit.

In the cases where DF Markets requests a consent for special (sensitive) personal data, this will always be explained to the client – the reasons for such data collection and how specifically that information will be used.

The client may withdraw their consent by a written request to DF Markets at any time.

## **LAW AND JURISDICTION**

This Policy shall be governed by and construed in accordance with the laws of England and Wales, and any disputes relating to this Policy shall be aimed to be resolved between the parties acting in good faith, and in case of failure to do so, they shall be subject to the jurisdiction of the English courts.



**Delta Financial Markets Limited** is a company registered in England and Wales

It is authorised and regulated by the Financial Conduct Authority (FCA)

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2038669658

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