

# BLACKWELL GLOBAL INVESTMENTS LIMITED

## PRIVACY POLICY

Blackwell Global Investments Limited ("Blackwell Global", the "Company", "we", "us") is a company duly incorporated under the laws of the Commonwealth of The Bahamas, with company registration number 201732 B and having registered office at 201 Church Street, Sandypport, P.O. Box N-3406, Nassau, NP, The Bahamas. Blackwell Global is authorised and regulated by the Securities Commission of The Bahamas ("SCB"), with registration number SIA-F215.

## PRIVACY POLICY

Blackwell Global takes your privacy very seriously and we are bound by the Data Protection Principles contained in the Data Protection (Privacy of Personal Information) Act. This Privacy Policy (the "Policy") outlines how we collect, manage and disclose your personal information and ensure that it remains confidential and secure. Your use of this website constitutes acceptance of the terms of this Policy. This Policy will be reviewed from time to time to take account of new laws and technology and any changes to our operational processes and any amendments to this Policy will be incorporated in an updated version posted on the Company's website. Your subsequent use of the website constitutes acceptance of those changes. Any information we hold will be governed by the most recent version of the Policy.

Data protection laws say that the personal information we hold 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

Blackwell Global is the data controller for your trading activity and ancillary activities in relation to your trading account(s) held with us. The data controller is responsible for deciding how your information is used and ensuring it is private and secure.

### 1. Use of Personal Information

#### 1.1 Identity Verification and Account Management

Blackwell Global needs to collect certain personal information to be able to offer its range of financial products and services to its customers.

We will collect and maintain most personal information from customer use of this website. This may be through the use of the application and other types of forms and through active use of the customer trading account. The type of information may include (but is not limited to) name, address, date of birth, contact details, employment and income, transaction history, areas of the website used and visited and links to and from third party websites. We may also need to collect and maintain information from external sources such as credit reference and identity verification agencies. Periodically, we may ask you to voluntarily provide us with information for our marketing or survey purposes.

#### 1.2 Provisions, Improvement and Development of Products and Services

Blackwell Global will use your information for the purpose of opening and maintaining an account, confirming your identity, managing your profile and trading account and to enable us to provide you with the products and services that you have requested from us. Unless you advise us to the contrary, we will also communicate with you about relevant information and opportunities relating to existing and new products and services which we consider suitable for you.

We may, from time to time, use personal information provided by you through your use of our services and/or through customer surveys to help us improve our products and services. It is in our legitimate interests to do so.

### 1.3 Settlement of Enquiries and Disputes

Where we consider there to be a risk that we may need to defend or bring legal claims, we may retain your personal information as necessary for our legitimate interests in ensuring that we can properly bring or defend legal claims. We may also need to share this information with our insurers or legal advisers. How long we keep this information will depend on the nature of the claim and how long we consider there to be a risk that we will need to defend or bring a claim. It is in our legitimate interests to use your personal information in such a way.

### 1.4 Compliance with Applicable Laws and Regulations

We 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. We do this not only to comply with our legal obligations but because it may also be in our legitimate interest to do so.

### 1.5 Profiling

We may from time to time use personal information about you to form profiles about you so that we understand your needs and provide the very best products and services we can. We may also make decisions about you through automated profiling or automated credit checks which could affect your ability to use our services. We may need to do this either to perform our legal obligations or because it is in our legitimate interest to use your personal information in such a way.

### 1.6 Marketing

We may collect your name and contact details (such as your email address, phone number or residential address) in order to send you information about our products and services which you might be interested in. We may collect this directly from you, or through a third-party. If a third-party collected your name and contact details, they will only pass those details to us for marketing purposes if you have consented to them doing so. It is in our legitimate interest to use your personal information in such way.

You always have the right to “opt-out” of receiving our marketing. You can exercise the right at any time by contacting us. If we send you any marketing emails, we will always provide an unsubscribe option to allow you to opt out of any further marketing emails. If you “opt-out” of our marketing materials you will be added to our suppression list to ensure we do not accidentally send you further marketing.

We never share your name or contact details with third-parties for marketing purposes unless we have your “opt-in” consent to share your details with a specific third-party for them to send you marketing. We do use third-party service providers to send out our marketing, but we only allow them to use that information on our instructions and where they have agreed to treat the information confidentially and to keep it secure. It is in our legitimate interest to use your personal information in such way.

We retain your details on our marketing list until you “opt-out” at which point we add you to our suppression list. We keep that suppression list indefinitely to comply with our legal obligations to ensure we do not accidentally send you any more marketing.

### 1.7 Website Information

Our web pages and e-mails may contain web beacons or pixel tags or any other similar type of data analysis tools which allow us to track receipt of correspondence and to count the number of users that have visited our webpage or opened our correspondence. Where your personal information is completely anonymised, we do not require a legal basis as the information will no longer constitute personal information. However, where your personal information is not in anonymised form, it is in our legitimate interest to continually evaluate that personal information to ensure that the products and services we provide are relevant to the market.

## 1.8 References and Surveys

From time to time, third-parties, such as credit agencies may approach us to provide a credit reference about you for credit and identity checks. It may be in our legitimate interest to comply with our legal obligations or we may be obliged to provide such a reference in order to comply with a legal obligation.

From time to time, we may send you surveys as part of our customer feedback process and it is in our legitimate interest to ask for feedback to ensure that we provide the best service to you. However, we may from time to time also ask you to participate in other surveys and if you agree to participate in such surveys we rely on your consent to use the personal information we collect as part of such survey. All responses to any survey we send out whether for customer feedback or otherwise will be aggregated and depersonalised before survey results are shared with any third parties.

## 1.9 Internal Business and Record Keeping

We may need to process your personal information for internal business and research purposes and record keeping purposes. Such processing is in our own legitimate interests and is required in order to comply with our legal obligations. This may include any communications that we have with you in relation to the services we provide to you and our relationship with you. We will also keep records to ensure that you comply with your obligations under any contract you have entered into with us.

## 1.10 Our Premises

We collect information about visitors to our premises. We may record information on your visit, including the date and time, who you are visiting, your name, employer, contact details and vehicle registration number. If you have an accident at our premises, this may include an account of your accident. It is in our legitimate interest to do so.

We may operate CCTV at our premises which may record you and your activities. We display notices to make it clear what areas are subject to surveillance. We only release footage following a warrant or formal request from law enforcement, or as necessary in relation to disputes. It is not only a legal requirement but also in our legitimate interest to do so.

## 1.11 Sharing with Cooperation Partners

We may share your personal information with cooperation partners who provide services on our behalf or have introduced you to us. It is in our legitimate interest to use your personal information in such way to provide you with our services.

## 1.12 Disclosure of Information

In the standard operation of our business, we may disclose your personal information to the following (who may be within or outside The Bahamas):

- our associated companies
- successors in title to our business
- our third-party service providers and professional advisors
- credit agencies
- any organisation or person expressly instructed by you
- any relevant regulatory, governmental or law enforcement authority as required by law
- third-parties necessary to provide the products and services requested by you
- introducing brokers with whom we have a mutual relationship
- anyone authorised by you

We require that organisations outside of our group of companies who handle or obtain personal information as service providers acknowledge the confidentiality of this information, undertake to respect any individual's right to privacy and comply with the Data Protection Principles and this Policy.

Please note that third-parties such as credit reporting and reference agencies may keep a record of any searches and may use the search details to assist other companies in performing their searches.

We may transfer your personal information outside The Bahamas to other of our group companies as well as processors who are engaged on our behalf. To the extent we transfer your information outside The Bahamas, we will ensure that the transfer is lawful and that there are appropriate security arrangements.

In order to transfer personal information to third-parties in territories where applicable legislation may not be adequate, we will enter into arrangements with such third-parties to ensure appropriate and suitable measures based on standard contractual terms and conditions adopted by the Data Protection Commissioner of The Bahamas.

## 2. Collection of Personal Data

We may collect the following types of information from actual or potential customer:

- name, address and contact details including but not limited to phone number and email address
- date of birth and gender
- professional and employment details
- ID and/or passport number
- national/tax identification number
- information about your income and wealth including details about your assets and liabilities, account balances, tax and financial statements
- trading history and performance
- any other similar information.

We obtain this information through your use of our services or other dealings with us including through any of our websites, apps, the account opening applications, demo sign up, webinar sign up, subscribing to news updates and from information provided in the course of ongoing customer communication. We may collect this information about you from third-parties either through third-parties or publicly available sources.

We may ask for other personal information voluntarily from time to time and if you choose not to provide the information we require to fulfil your request for a certain product or service, we may not be able to provide you with the requested product or service.

Please note that we keep records of your trading history including:

- products you trade and their performance
- products we trade on your behalf and their performance
- historical data about the trades and investments you made including the amount invested
- your preference for certain types of services and products

We may record any communications, electronic, by telephone, in person or otherwise, that we have with you in relation to the services we provide to you and our relationship with you. These recordings will be our sole property and constitute evidence of the communications between us. Any telephone conversation may be recorded without the use of a warning tone or any other further notice.

Please note that our offices or premises may have CCTV which will record your image.

## 3. Security of Information

We take the safeguarding of your data very seriously. All personal information in our possession is held securely. Only our authorised employees are permitted access to your personal information, strictly for business purposes.

## 4. Your consent

Where the use of your personal information by us requires your consent, such consent will be provided in accordance with the applicable customer terms and conditions available on our website(s) or any other contract we may have entered into with you or stipulated in our communication with you from time to time.

Where we rely on your consent as our legal basis for processing your personal information, you have the right to withdraw your consent at any time by contacting us using the contact details set out below.

## 5. Security and Storage of Personal Information

Blackwell Global takes the safeguarding of your data very seriously. Blackwell Global has taken measures and precautions to protect the security of your personal information. Our employees understand to respect the confidentiality of your personal information. The Company's compliance officer ensures our compliance with this Policy and applicable laws and regulations.

We hold personal information in secure computer storage facilities, paper-based files, and/or other records. When we consider that personal information is no longer needed, we will remove any details that will identify you and we will securely destroy the records.

Please note that we are subject to certain laws and regulations which require us to retain a copy of the documents we used to comply with our customer due diligence obligations, and supporting evidence and records of transactions with you and your relationship with us for a period up to seven (7) years after our relationship with you has terminated.

If we hold any personal information in the form of a recorded communication, by telephone, electronic, in person or otherwise, this information will be held in line with local regulatory requirements which will be up to (7) years after our relationship with you has terminated.

Where you have opted out of receiving marketing communications we will hold your details on our suppression list so that we know you do not want to receive these communications.

## 6. Cookies

A cookie is a small piece of text stored on your computer or device when you visit a website or an app. We use cookies on our websites and apps to provide you with more relevant and effective experience. For further information about cookies please refer to our website.

## 7. Links to Third-Party Websites

Our websites or apps may have links to external third-party websites. Please note that third-party websites are not covered by this privacy notice and those websites are not subject to Blackwell Global's privacy standards and procedures. Please check with each third-party regarding their privacy standards and procedures.

## 8. Technology Improvements

We want to provide you with better and improved experience through constant technology development. This may result in a change to the way in which personal information is collected or used. The impact of any technology changes which may affect your privacy will be notified in this Policy at the time of change.

## 9. Your Rights

Subject to its stated exceptions, the Data Protection (Privacy of Personal Information) Act gives you a number of rights when it comes to personal information we hold about you. The key rights are set out below. More information about your rights can be obtained from the Office of the Data Protection Commissioner ("ODPC"). Under certain circumstances, by law you have the right to:

- Be informed in a clear, transparent and easily understandable way about how we use your personal information and about your rights. This is why we are providing you with the information in this Policy. If you require any further information about how we use your personal information, please let us know.
- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third-party) and there is something about your particular situation which makes you want to object to us using your information on this basis and we do not have a compelling legitimate basis for doing so which overrides your rights, interests and freedoms (for instance, we may need it to defend a legal claim). You also have the right to object where we are processing your personal information for direct marketing purposes.
- Withdraw consent. In the limited circumstances where we are relying on your consent (as opposed to the other bases set out above) for 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 we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate interest in doing so.
- Lodge a complaint. If you think that we are using your information in a way which breaches data protection law, you have the right to lodge a complaint with the Office of the Data Protection Commissioner.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal information, withdraw your consent to the processing of your personal information or request that we transfer a copy of your personal information to another party, please contact us.

You will not have to pay a fee to access your personal information or to exercise any of the other rights under the Data Protection (Privacy of Personal Information) Act. However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us understand the nature of your request, to confirm your identity and ensure your right to access the information or to exercise any of your other rights. This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Please consider your request responsibly before submitting it. We will respond to your request as soon as we can. Generally, this will be within forty days from when we receive your request but, if the request is going to take longer to process, we will let you know.

## 10. Complaints and Contact

If you are concerned about us ensuring your privacy, you can make a complaint. We will act upon it promptly. You can contact our Complaints Department at [complaints@blackwellglobal.bs](mailto:complaints@blackwellglobal.bs)

If you are not satisfied with our response to your complaint, you have the right to file a complaint with the Office of the Data Protection Commissioner (“ODPC”). Further details are available on the ODPC’s website.

If you have any questions regarding this Policy, please email: [compliance@blackwellglobal.bs](mailto:compliance@blackwellglobal.bs)

You may request at any time that we amend, update or (subject to our necessary legal, regulatory and business requirements) delete personal information which we hold concerning you. Please contact us at [cs@blackwellglobal.bs](mailto:cs@blackwellglobal.bs) to ask us to make these changes on your behalf.