



Last updated: 27 January, 2021

BTIG Limited Privacy Policy

About this privacy notice

BTIG Limited (“BTIG”) is a data controller in respect of your personal data for the purposes of data protection law, including the European Union’s General Data Protection Regulation (“GDPR”) and the United Kingdom (“UK”) GDPR and Data Protection Act 2018. We are responsible for ensuring that we use your personal data in compliance with data protection law.

This privacy notice applies to you if you are a client or prospective client of BTIG; a service provider to us; or you otherwise enter into communications with us by email or other means.

This privacy notice sets out the basis on which personal data about you that you provide to us, that we create about you or that we obtain about you from other sources, will be processed by us.

Personal data that we might use

We may process the following personal data about you:

- a. Information provided to BTIG by you: This might include your name and address (including proofs of name and address), contact details, date of birth, gender, nationality, photograph, signature, copies of identity documents, occupational history, job title, income, assets, other financial information, bank details, investment history, tax residency and tax identification information. Such information might be provided in an application form or in other documents (as part of an application process or at other times), face-to-face, by telephone, by email or otherwise.
- b. Information that BTIG collects or generates: This might include information relating to your emails (and related data), call recordings and website usage data.
- c. Information that BTIG obtains from other sources: This might include information obtained for the purpose of our know-your-client procedures (which include anti-money laundering procedures, counter-terrorist financing procedures, politically-exposed-person checks, sanctions checks, among other things), information from government or public bodies, public websites and other public sources and information received from your advisers or from intermediaries.

Appendix 1 provides more detail about the purposes for collection, the information we may collect, the sources of the information and the legal authority relied upon by us.



Uses of your personal data

We collect your personal information to fulfil our contractual obligations, our statutory and regulatory obligations, the legitimate business interests of BTIG and/or for other purposes for which BTIG has a lawful basis under data protection laws, including:

- a. Compliance with legal and regulatory obligations and industry standards, including know-your-client procedures, the automatic exchange of tax information and legal judgments;
- b. General business administration, including communicating with clients, communicating with service providers and counterparties, accountancy and audit services, risk monitoring, the administration of Information Technology systems and monitoring and improving products; and/or
- c. Business activities, such as client relations, discussions with our service providers and counterparties, business strategy, development and marketing.

We are entitled to process your personal data in these ways for the following reasons:

- a. Processing may be necessary to discharge a relevant legal or regulatory obligation.
- b. Processing is necessary for the legitimate business interests of BTIG, its clearing firm, or a third party, such as:
 - i. carrying out the ordinary or reasonable business activities of BTIG or its clearing firm or other persons, or other activities previously disclosed to you or referred to in this privacy notice;
 - ii. ensuring compliance with all legal and regulatory obligations and industry standards, and preventing fraud;
 - iii. establishing, exercising or defending legal rights or for other purposes relating to legal proceedings; and/or
 - iv. ensuring the security of information systems.
- c. In respect of any processing of sensitive personal data falling within special categories, such as any personal data relating to the political opinions of a politically exposed person, the processing will be necessary for reasons of substantial public interest.
- d. Processing is necessary to deliver a contractual or pre-contractual service to you.

Disclosure of your personal data to third parties

We may from time to time, in accordance with the purposes described above, disclose your personal data to third parties, which may include:

- a. Our current affiliates, including: BTIG, LLC, BTIG Hong Kong Limited, BTIG Australia Limited, BTIG Singapore PTE Ltd, BTIG Limited Svensk Filial, BTIG Germany GmbH, BTIG Norway AS, BTIG Japan KK, Condor Trading LP, and any entities we may become affiliated with in the future (collectively, "Affiliates");
- b. Professional advisers such as law firms, auditors, and accountancy firms;

- c. Other service providers of BTIG or its clearing firm, including technology and telephony service providers, software application providers (including those hosted on premises, on third party premises, and by cloud service providers), human resources service providers, payroll service providers, information commissioners, insurance providers, exchanges, brokers, investment and retail banks, and office and technology equipment suppliers;
- d. Courts and regulatory bodies, and tax and governmental authorities.

Some of these persons will process your personal data in accordance with our instructions and others will themselves be responsible for their use of your personal data. These persons may be permitted to further disclose the personal data to other parties.

Transfers of your personal data outside the European Economic Area and United Kingdom

Your personal data may be transferred to and stored by persons outside the European Economic Area (the “EEA”) and UK, such as BTIG’s Affiliates outside the EEA and UK. Additionally, BTIG may transfer your personal data to service providers outside the EEA and UK, including brokers, dealers, technology service providers, human resources service providers, and payroll service providers.

Where personal data is transferred outside the EEA and UK, we will ensure that the transfer is subject to appropriate safeguards or is otherwise permitted under applicable law. For example, the country to which the personal data is transferred may be approved by the European Commission, or the recipient may have agreed to model contractual clauses approved by the European Commission that oblige them to protect the personal data. To the extent any personal information is transferred from a BTIG entity or an affiliate within the EEA or UK to a BTIG entity or an affiliate outside the EEA and UK, this transfer is legitimised and your personal information is adequately protected under the terms of the model contractual clauses.

We reserve the right to disclose your personal information as required by law, or when we believe that disclosure is necessary to protect our rights and/or comply with a judicial proceeding, court order, request from a regulator, national security, for the purposes of public importance or any other legal or investigatory process involving us. Should we, or any of our Affiliates, be the subject of a takeover, divestment or acquisition, we may disclose your personal information to the new owner of the relevant business and their advisors on the basis of our legitimate interest.

Necessity of personal data for us to provide services to you

The provision of certain personal data is necessary for us to provide services to you and for compliance by BTIG, our Affiliates, and our respective service providers with certain legal

and regulatory obligations. Accordingly, if certain personal data is not provided when requested, we may not be able to provide services to you.

Retention of personal data

How long we hold your personal data for will vary. The retention period will be determined by various criteria, including the purposes for which we are using or processing it (as it will need to be kept for as long as is necessary for any of those purposes) and legal obligations (as laws or regulations may set a minimum period for which we have to keep your personal data).

Your rights

You have a number of legal rights in relation to the personal data that we hold about you. These rights include the following:

- a. The right to obtain information regarding the processing of your personal data and to access to the personal data that we hold about you.
- b. In some circumstances, the right to receive some personal data in a structured, commonly used and machine-readable format and the right to request that we transmit that data to a third party where this is technically feasible. Please note that this right only applies to personal data which you have provided to us.
- c. The right to request that we rectify your personal data if it is inaccurate or incomplete.
- d. The right to request that we erase your personal data in certain circumstances. Please note that there may be circumstances where you ask us to erase your personal data but we are legally entitled or required to retain it.
- e. The right to object to, and the right to request that we restrict, our processing of your personal data in certain circumstances. Again, there may be circumstances where you object to, or ask us to restrict, its processing of your personal data but we nonetheless may be legally entitled or required to continue processing your personal data or to refuse that request.
- f. The right to lodge a complaint, should you believe that any of your rights have been infringed by us.
- g. The right to opt out of receiving marketing communications.

Contacting us

If you have any questions about this privacy policy or our privacy practices, please contact our compliance officer in the following ways:

BTIG Limited

Email address: privacy@btig.com



Postal address: 2nd Floor Princes Court, 7 Princes Street, London, EC2R 8AQ

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO and request that you please contact us in the first instance.

Appendix 1

The following table describes in more detail the information we may collect, where it comes from, why we need it, how we may use it and which categories we have disclosed for a business purpose.

Purpose	Personal Information	Source of data	Legal basis for use	Categories disclosed for a business purpose
Contact information	Name, job title or role, office address, location, email, addresses, work phone number, mobile phone number, fax number.	Directly from the individual or provided by a client or other contact	Clients: Necessary for contract Others: Business need – for administration purposes and to provide services and/or receive services (in the case of vendors)	Identifiers
Identity verification and background checks (“Know Your Client” due diligence)	Corporate client contacts: Job status, title, role description, directorships, shareholdings, home addresses. Depending on the verification document provided: age/date of birth/birth month and year photograph, passport, birth/marriage certificate, Tax Identification Number, National Identity Card, Social Security or National Insurance Number, driving licence, bank account details, bank statement, utility bill, insurance certificate, tenancy agreement. Individual clients (in addition to the above): personal email, home/cell phone number, country of residence	Directly from the individual or provided by a client contact. Information is also obtained from third party sources: Public registers of company directors and shareholdings; Credit reference agencies; Regulatory bodies; Government departments and agencies; Verification service providers	Necessary for contract Legal obligation Prevention or detection of crime	Identifiers Commercial Information Professional or employment-related information

Anti-money laundering, Politically Exposed Persons, terrorist financing and related regulatory checks	All of the above, along with: Political affiliation. Criminal activity and offences committed. Nationality and residence. Payment arrangements and source of finance/funds	Directly from the individual or provided by a client contact (e.g. about a family member or associate). Information is also obtained from third party sources: Public registers of company; directors and shareholdings; Credit reference agencies; Regulatory bodies; Government departments and agencies; Verification service providers; Searches of publicly available information	Legal obligation Prevention or detection of crime	Identifiers, Commercial Information Professional or employment-related information Characteristics of protected classifications
The provision of services and related administration	Name, job title or role, office address, location, email, addresses, work phone number, mobile phone number, fax number.	Directly from the individual or provided by a client or other contact. Generated by the firm during the client relationship.	Necessary for contract Business need (to provide broker-dealer services) Legal obligation Prevention or detection of crime	Identifiers Characteristics of protected classifications
Marketing	Name, job title or role, office address, location, email, addresses, work phone number, mobile phone number, fax number.	Directly from the individual	Legal obligation - consent Legitimate Interests Register Business need: to promote client interest and business growth	Identifiers Commercial information