



# PleXHub Privacy Policy

Version 1.2

PleXHub Ltd. (**PleXHub** or **we** or **us** or **our**) recognises the need to protect the privacy of all the personal information we store about you, collected at the time your account is setup or as you access and use our website, found at <https://plexhub.com> (**Website**), web-applications and/or application programming interfaces, collectively referred to as the service (**Service**).

We have adopted this privacy policy (**Privacy Policy**), which, among other things, describes the type of information that will be collected and that may be considered personal, the purpose for its collection, and your rights with regard to the collected information. This Privacy Policy governs how we collect and use your personal information, whenever and however you use our Service. By accessing the Service, you are consenting to the collection and use of your information by PleXHub, but only to the extent described herein. Should you wish to revoke your consent or exercise any of your rights, as specified under data protection laws, you may do so by contacting PleXHub (Section 14).

## 1. Protecting your information

As a data controller we are responsible for the information in our custody. Therefore, when we collect or use your information, we will utilise commercially reasonable safeguards to ensure its protection. It should be noted that no security procedure is currently 100% effective. Should any breach of your personal information occur, we will inform you as soon as reasonably possible, as required by law.

## 2. What data do we collect?

We collect information at the point at which your account is setup and at various points during your use of our Service. Depending on the purpose of its use (Section 2), the following information, grouped as indicated, may be considered personal information (**Personal Information** or **Personal Data**):

- 2.1. **Identity Information:** To have an account with us, we require certain identifying information including your:
  - 2.1.1. name;
  - 2.1.2. work email address;
  - 2.1.3. work telephone number; and
  - 2.1.4. the identify of the company you work for.
- 2.2. **Communication Preferences:** Information such as whether you wish to receive marketing material from us or price notifications, sent by brokers from our email servers.
- 2.3. **Tracking Information:** Information such as the length of time you have been logged in for, the frequency with which you log in and the pages and products you spend most time viewing.
- 2.4. **Technical Information:** This includes information such as your IP address, web browser type and version, operating system and the referring website.
- 2.5. **Quote Data:** This includes an archive or all quotes, indications of interest and any other messages that have been posted on the Service. These data are linked to one or more PleXHub accounts, for example, a quote will always be associated with at least two accounts: one identified as the initiating trader and the other, the broker marketing the quote.
- 2.6. **Audit Data:** We will track and archive various actions instigated on the Service including but not limited to adding, amending and cancelling quotes. We collect data that includes the type of action, the date and time at which the action was taken and the identity of the account holder that initiated action.



### **3. How do we use your data?**

#### **Before Accepting our Terms and Conditions**

Before your account is opened we require your Identity Information. This is provided to us by the party requesting the account is setup. This requesting party will either be:

- 3.1. a broker that uses our Service and reports to have a business relationship with you involving the products quoted on our Service;
- 3.2. another person at your firm with an existing PleXHub account; or else
- 3.3. the request may come directly from you.

Once your account has been setup, we will send an email (**Initial Email**) to your work email address with temporary login credentials and you will be asked to activate the account by agreeing to our terms and conditions, found at [https://plexhub.com/terms\\_and\\_conditions](https://plexhub.com/terms_and_conditions) (**Terms and Conditions**), which includes accepting this Privacy Policy.

If you do not activate your account within thirty (30) days of receipt of that email, we will delete your Personal Information from our system. If you do not intend to activate your account and wish us to delete your Personal Information sooner than thirty (30) days, please make the request by either replying to the Initial Email or emailing [support@plexhub.com](mailto:support@plexhub.com). Prior to accepting our Terms and Conditions, your Personal Information will not be used for anything other than to send you the Initial Email.

#### **After Accepting our Terms and Conditions**

Once you have agreed to our Terms and Conditions, which includes accepting our Privacy Policy, we will use the information we collect in the following ways:

- 3.4. **Identity Information:** We require this data to register and administer your PleXHub account. It is required so that we can associate your account with a natural person and identify the company for which you are an acting agent. The identity information includes your contact details that we may use in accordance with your Communication Preferences.
- 3.5. **Communication Preferences:** This information is used to modify the range of communications sent to you from our email servers. If you believe you have received an email you did not subscribe to, you may opt out of further such emails by either using the unsubscribe link in the email, changing your privacy settings on the Service or by contacting us at [support@plexhub.com](mailto:support@plexhub.com).
- 3.6. **Tracking Information:** We use this data to examine how our customers interact with the Service to ensure a good user experience. When used in anonymised, aggregated analyses, this data is not considered Personal Information, however, when used to track the activity of a specific user, the data is considered Personal Information.
- 3.7. **Technical Information:** We use this data to examine how our customers use the Service to ensure a good user experience and to anticipate and resolve problems with your service. When used in anonymised, aggregated analyses, this data is not considered Personal Information, however, when used to resolve problems with your specific service, the data is considered Personal Information.
- 3.8. **Quote Data and Audit Data:** This data, or a subset of it, is published via the Service, for example, as live or historical quote and trade data. It is used to resolve any queries regarding the history of any given record (for example, a quote) published on the Service, including identifying the natural person responsible for entering or altering the record, the company for whom they were acting as an agent, the date and time at which their action occurred and the previous state of the record, if their action was to alter an existing record. While used for these purposes, the data are not considered Personal Information. However, the data may also be analysed to identify if a particular user has an interest in certain products or aspects of the Service, so that we may tailor our communications with that user, in accordance with their Communication Preferences. While using the data for this purpose, we consider it to be Personal Information.

Please note that we may process your Personal Information without your knowledge or consent, in compliance with the above rules, when required or permitted by law. Additionally, Personal Information may be used and disclosed to the extent we may deem reasonably necessary to enforce the terms of any agreement between



you and PleXHub, or to protect the rights, property or safety of any person or entity.

#### **4. Personal Information Sharing**

We will not sell, rent or disclose to outside parties the Personal Information we collect and store. We may disclose Personal Information for the purposes of fulfilling the contract we have with you and/or the enforcement of legal rights and if so, we would require all third parties to respect the security of your Personal Data and to treat it in accordance with the law. We do not allow our third-party service providers to use your Personal Data for their own purposes and only permit them to process your Personal Information for specified purposes, in accordance with our instructions.

#### **5. How long will we retain your Personal Data?**

Before Accepting our Terms and Conditions, we will only retain your Personal Information for a maximum of thirty (30) days (Section 2).

On accepting our Terms and Conditions, your new account is considered activate. We will securely store and use all your Personal Data while your account remains active. Should your account be deactivated, we retain the right to store parts of your Personal Data in perpetuity, specifically, your Identifying Information. This is to ensure the Quote Data and Audit Data archives remain complete, specifically, so that each element within those datasets can continue to be attributed to identifiable natural persons, even if one or more of those natural persons' accounts have been deactivated. Provision of complete Quote Data and Audit Data to relevant parties is a core part of the Service. However, while we may continue to store information, including Identity Information, associated with deactivated accounts, we will not use the information in a way that would require us to consider it Personal Information, once an account is deactivated.

#### **6. Your Rights**

As a data subject, you have the following rights under data protection laws in relation to your Personal Information:

- 6.1. The right to be informed about our collection and use of your Personal Data;
- 6.2. The right of examine the Personal Data we have collected and store about you. We reserve the right to redact any information that might reveal Personal Data about another user;
- 6.3. The right to rectification if any Personal Information we hold about you is inaccurate or incomplete;
- 6.4. The right to be forgotten and ask us to delete all the Personal Data we hold about you that will not seriously impair the objectives of other data processing (Section 2);
- 6.5. The right to restrict the processing of the data we collect for reasons that lead us to consider the data Personal Information;
- 6.6. The right to object to us using your Personal Data for particular purposes; and
- 6.7. The right to withdraw your consent regarding our handling of your Personal Data.

To exercise any of these rights, please email us your request at [support@plexhub.com](mailto:support@plexhub.com). We may request you provide additional information to confirm your identity and your right to access the Personal Data. There will typically be no fee charged to access your data or exercise any of your other rights. However, we reserve the right to charge you a reasonable administrative fee should your request be clearly unfounded, repetitive or excessive. We aim to respond to all legitimate requests for Personal data within thirty (30) days, however it may take longer depending on the complexity of your request, in which case, we will keep you informed of our progress towards fulfilling your request.

If you have any cause for complaint about our use of your Personal Information, please contact us at [support@plexhub.com](mailto:support@plexhub.com) and we will do our best to resolve the problem for you. If we are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority for data protection issues, the Information Commissioner's Office (ICO) ([www.ico.org.uk](http://www.ico.org.uk)).

For further information about your rights, please contact the ICO.



## 7. Cookies and Similar Technologies

When you use our Service, our web server sends cookies to your computer. Cookies are small pieces of information which are issued to your computer when you visit a website or use a web application that store information about your use of that website or web application. The Service may use a number of cookies and/or similar technologies. Some of these will only last for the duration of your session and expire when you close your browser and exit the Service, while others are used to remember you when you return to the Service and will last for longer.

We have categorised the cookies we use into the following two groups:

7.1. **Essential Cookies:** These cookies are essential to the correct operation of the Service, for example, the logging in process requires the use of cookies.

7.2. **Non-Essential Cookies:** These cookies are not essential but help us to improve your user experience. For example, we may store data on options that you have previously selected that change the look or feel of the Service, or data that can be used to analyse the performance of the Service or how our users interact with the Service.

Most web and mobile device browsers automatically accept cookies but, if you prefer, you can change your browser to prevent that or to notify you each time a cookie is set. You can also learn more about cookies by visiting [www.allaboutcookies.org](http://www.allaboutcookies.org) which includes information on how to block and delete cookies on different types of web browsers. Please note, however, that by blocking or deleting cookies used by the Service, you may not be able to take full advantage of the Service. You can also update your privacy settings on the Service to stop the use of Non-Essential Cookies.

## 8. Third-Party Links

The Website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy policies. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## 9. Changes to our Privacy Policy

We will only use your Personal Data for the purposes set out in the policy, unless we reasonably consider that we need to use it for another reason that is compatible with the original purpose. If we need to use your Personal Information for an unrelated purpose, we will notify you with an explanation and grounding in law for the new purpose.

PleXHub may make modifications, deletions and/or additions to this Privacy Policy (Changes) at any time. Changes will be effective: (i) thirty (30) days after we provides notice of the Changes, whether such notice is provided through the Service, is sent to the email address associated with your account or otherwise; or (ii) when you opt-in or otherwise expressly agree to the Changes or a version of the Privacy Policy incorporating the Changes, whichever comes first.

## 10. Contact Details

Full name of legal entity:	PLEXHUB LTD
Email address:	<a href="mailto:support@plexhub.com">support@plexhub.com</a>
Postal address:	20 Paradise Park, Lea Bridge Road, London E5 9UB, UK.
Telephone number:	+44 (0)203 900 1211
Name of Data Privacy Manager:	Tim Namssoo