

Privacy Policy

CBCX

MARKETS

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FSC License No. (GB24202880)

Company No. C208536

PRIVACY POLICY

Your Privacy Is Important to Us: We value the trust you have placed in us by choosing us as your financial services provider. At CBCX MARKETS, keeping your personal information in confidence is a cornerstone of our business and an integral part of our commitment to service excellence. To help us meet this commitment to you, CBCX MARKETS's Head of Compliance, Privacy & Data Protection is responsible for overseeing CBCX MARKETS's privacy practices and this privacy policy.

Your Privacy Is Important to You: We encourage you to read this privacy policy so that you can understand how we collect, use, share and protect your personal information. To help you understand our privacy policy, here are some important terms you should know:

- CBCX MARKETS GLOBAL LTD. is traded as CBCX MARKETS and registered with company number of 208536, hereinafter referred to as "we", "us", "our", "CBCX MARKETS". When we make reference to sharing information within the CBCX Group it means sharing by one or more members of the CBCX Group to some or all of the others in the CBCX Group.
- "personal information" or "information" means information about an identifiable individual such as contact information, account numbers, or details such as age, marital status, and financial information. This information can be in any form including paper, electronic, video or voice recording.
- "program partners" means companies we have carefully selected to provide benefits, products or services under, or to participate in, a CBCX MARKETS partner program.
- "CBCX MARKETS partner program" means a program under which CBCX MARKETS clients are entitled to receive specified benefits, products or services that are provided by, or in participation with, our program partners.
- "permitted or required by law" or "legal and regulatory obligations" means actions that we are permitted or required to do under any laws or regulations, or any rules, codes, guidelines, expectations, or requests of any applicable regulator or self-regulatory organization.
- "Territories" or "Territory" means the jurisdiction(s) where the products and/or services may be legally offered by CBCX MARKETS.
- "You" or "your" means the client of CBCX MARKETS.

ABOUT THIS PRIVACY POLICY

This privacy policy is consistent with our Terms of Use and the terms of your agreements with us. This policy applies to the collection, use or sharing of any personal information collected by CBCX MARKETS in the course of conducting its business. By providing us with information, you are consenting to our privacy policy.

Our Privacy Principle

CBCX MARKETS respects the following principles when collecting, using or sharing your personal

information:

a) Accountability

CBCX MARKETS is responsible for personal information under our control. There are designated individuals within CBCX MARKETS who are accountable for compliance with these privacy principles.

b) Obtaining Consent

CBCX MARKETS obtains your consent before sharing personal information, except where otherwise permitted or required by law.

c) Sharing of Your Personal Information

CBCX MARKETS collects personal information only by fair and lawful means. CBCX MARKETS does not use or share your personal information for purposes other than those for which it was collected except with your consent or where permitted or required by law. CBCX MARKETS retains personal information only as long as necessary for these purposes.

CBCX MARKETS takes reasonable care to keep personal information as accurate, complete and up-to-date as is necessary for customer service, legal or reasonable business purposes.

d) Keeping Your Information Accurate and Providing Access to Your Information

CBCX MARKETS takes care to keep personal information as accurate, complete and up-to-date as is necessary for the purposes for which it is to be used. Upon request, CBCX MARKETS will provide you with your personal information so that you can ensure that your information is accurate and complete, and can be updated, if appropriate.

e) Protecting Your Personal Information

CBCX MARKETS protects the privacy of personal information through security measures appropriate to the sensitivity of the information.

f) Addressing Your Concerns

You may contact us if you have questions or concerns about your confidentiality and privacy.

This privacy policy or our other privacy related documents will be updated from time to time.

What We Collect and How We Collect It

The type of personal information we collect will depend on various factors such as the type of products or services you request or use and any applicable legal and regulatory obligations. This information includes:

Contact – information that allows us to communicate with or contact you (e.g., address, telephone number, e-mail, social media account name and fax number).

Identity – information that allows us to identify you or to meet tax, anti-money laundering and other “know your client” legal and regulatory obligations (e.g., name, national identification number, date of birth,

occupation, government-issued identification and country of tax residency).

Financial – information that allows us to determine creditworthiness or eligibility for or appropriateness of products or services (e.g., employment and financial history with others, income, net worth, credit reports, investment knowledge and objectives, and details of security provided for loans).

Transactional – information about how you use different products or services or otherwise do business with us (e.g., purchase and payment history).

Relationship – information that helps us to understand more about you including how you like to do business and what types of products, services or offers you may like (e.g., communication preferences, location, demographics and interests).

Another Individual – information we request, or that you provide, about an individual other than yourself (e.g., information about beneficiaries under an insurance product, an authorized user of your account, and contact information of someone you believe may be interested in a CBCX MARKETS product or service). If you provide us with information about another individual, we will assume you have the authority to provide this information and to consent to its collection, use or sharing for the purposes set out in this privacy policy.

We collect information from a variety of sources but much of the information comes from you (e.g., applications for or use of our products or services, communications with us, and user-generated content on our social media websites such as photographs or comments you post).

We may also collect information from other sources such as credit bureaus, references you have provided, program partners, government or financial institutions or from public sources such as telephone directories, newspapers, internet sites, commercially available marketing lists or government agencies and registries or public records.

We may monitor or record communications between you and our representatives (e.g., telephone calls) in order to enhance and maintain client service quality, to protect you and CBCX MARKETS, to confirm our discussions with you or for training purposes. We use surveillance, including videotaping, in and around our branches, ABMs and other locations for the safety of our clients, employees and others, to protect against illegal activity, such as theft, vandalism and fraud, or to enhance and maintain client service quality.

How We Use and Share Information

We use and share personal information for the following purposes, to:

Provide You with Products or Services

- establish your identity and determine your eligibility for products or services
- help to ensure that the advice, products or services offered to or purchased by you are appropriate for you
- set up, manage, administer and maintain your products or services

- process your transactions

Communicate with You

send communications by various methods, such as mail, e-mail, text (SMS), telephone, automatic dialing-announcing device (at the numbers you have provided to us), fax, other telecommunication channels, social media, including marketing or communications about benefits, features or other details about products or services

Provide You with Value

- review and analyze your applications, transactions and other information to understand who you are, your financial needs and activities, and what products, services, and promotions may be of interest to you, including targeting promotions based on information that we have collected
- promote and market products or services offered by the CBCX Group, by our program partners or other third parties we have carefully selected
- better manage and improve your overall relationship with the CBCX Group including monitoring, reviewing or improving client service and business processes to make it easier to do business with us
- encourage you to continue doing business with us

Manage our Business

- perform our everyday business and operations including record keeping or internal reporting
- understand and better operate and manage CBCX Group's business and to develop products and services, including conducting market research or analyzing data we hold about you
- administer referral arrangements
- use third-party service providers (including CIBC) to perform services on our behalf
- manage CBCX Group's credit, business and other risks as may be required to operate as an effective, efficient and financially prudent financial institution
- meet tax or legal and regulatory obligations
- protect you and us from error and criminal activity including the prevention, detection and investigation of fraud, money laundering, cyber threats and other such risks and threats (e.g., we will review and analyze your applications, transactions and other information to help us identify various types of threats and risks such as credit, fraud, and money laundering)
- share with other financial institutions, including correspondent or intermediary banks with which we do business
- where required for a proposed sale, reorganisation, transfer, financial arrangement, asset disposal or other transaction relating to our business and/or assets held by our business
- in anonymised form as part of statistics or other aggregated data shared with third parties

Some of the specific ways we use and share your information within the CBCX Group or with third parties include:

Program Partners – We share information with our program partners to help determine your eligibility for a CBCX MARKETS partner program. If you participate in a CBCX MARKETS partner program, we also share information in order to administer, develop, manage and promote the CBCX MARKETS partner program including accrual of points or rewards, reporting on and analyzing the program's performance, developing new benefits, products or services, and conducting market research. If you withdraw your consent to this sharing we may not be able to provide you with the product or service (e.g., where the program is an automatic benefit of the product like a credit card with a rewards program).

Joint Accounts or Representatives – Where you hold a product or service jointly with another person (e.g., joint accounts) or where someone is authorized to use or access your product or service (e.g., authorized user on a credit card), or where liability is shared with others (e.g., someone has provided a guarantee or indemnity for your obligations), we may share your information with them (or their representative) in connection with the product or service. Where someone is acting as a representative or we reasonably believe is acting with proper authorization (e.g., legal guardian, a person having power of attorney, estate representative, a lawyer, an accountant, and, for minor children, a parent or guardian) we may share information with and take instructions from them.

Protect You – Where you might be a victim of fraud, financial abuse, or other illegal activity or where we have reasonable grounds to believe your interests can best be served by taking action, we may share information with the appropriate legal or governmental authorities, your next of kin or any other appropriate person. In these circumstances, we will only share information we believe is reasonably necessary to protect your interests.

Protect Us – We share information to protect our rights or interests. For example, where we are involved in judicial, administrative or regulatory proceedings, or other similar processes including enforcing our rights (e.g., to collect on a debt). Or, in order to comply with any legal and regulatory obligations including any subpoena, warrant, or any judicial, administrative orders or demands.

Business Transactions – If we enter into a business transaction involving personal information, we may share information with the other parties to the transaction (e.g., as part of due diligence or on completion of the transaction). We require that the other parties keep this information confidential and limit its use to the purposes of the transaction. Where we enter into a business transaction involving the purchase of information by us, this policy will apply to our collection, use and sharing of the purchased information. If we sell assets, the purchaser may be permitted or required by law to retain certain information for a period of time. We may also share your information with the beneficial owner of a product or service we provide you.

Protecting Your Personal Information

At CBCX MARKETS we take the protection of your personal information seriously. We make reasonable efforts to prevent unauthorized use, sharing, loss or theft of information. We regularly audit our security procedures and assess that they remain effective and appropriate.

Employees who have access to your information are made aware of the importance of keeping it confidential. Depending on the nature of the information, it may be stored in the branch or office you deal with, in various computer systems, or in the record storage facilities of the CBCX Group or service

providers.

Where we use service providers who might have access to your information, we select them carefully and require them to have privacy and security standards that meet CBCX MARKETS's requirements. We use contracts and other measures with our service providers to maintain the confidentiality and security of your information and to prevent it from being used for any other purpose.

CBCX MARKETS, service providers and other parties with whom we share your information under this privacy policy, may perform activities outside of a Territory or the Territories, as permitted by local law. As a result, your information will be securely used, stored or accessed in other countries and be subject to the laws of those countries. For example, your information may be shared in response to valid demands or requests from government authorities, courts and law enforcement officials in those countries.

The length of time we keep your information will vary depending on the Territory you are in, the product or service and the type of the information. We keep your information for as long as we reasonably need it for customer service, legal requirements or reasonable business purposes. For these reasons, we keep your information beyond the end of your relationship with us. When your information is no longer required, we securely destroy it or delete personally identifiable information.

Information may be stored and processed in any country where we have affiliates or service providers. By using our products or services, you consent to the transfer of information to countries outside of the Territory in which you are located which may provide for different data protection rules.

Your Privacy Choices

Subject to legal, business or contractual requirements, you can withdraw your consent to our collection, use or sharing of your information at any time upon giving us reasonable notice. However, withdrawing your consent may limit or prevent us from providing you with, or being able to continue to provide you with, specific products or services. Please note that if you request us to delete your information we may be unable to do so as we may need to retain your information for legal or regulatory purposes including defence of legal claims or performance of a contract to which you are a party. In particular, during our relationship with you, we provide you with the following privacy choices:

- **Marketing:** From time to time the CBCX Group may offer you products or services, including special promotions, which may be of interest to you. Consent to receive marketing is optional and you can decide to withdraw it at any time. However, this will not limit the information provided to you through discussions with a CBCX MARKETS representative or through general CBCX MARKETS marketing or servicing channels (e.g., posters in branches and electronic messages on ABMs or our website), or information we send you that is related to your existing products and services or is permitted or required by law.
- **Call Recording:** If you do not wish to have your telephone calls recorded, you have the option to conduct your business with us through a CBCX MARKETS branch, office or location, through the use of our ABMs, through our Online banking services, or by writing to us.

In certain circumstances your consent cannot be withdrawn. For example, you may not withdraw your consent where our collection, use or sharing is permitted or required by law, is required to ensure we have correct and up to date information about you (e.g., current address), or is

necessary to manage our business including the sharing of your information when we assign our rights to others for business transactions.

- Keeping Your Information Updated

We take care to keep your information in our records as accurate, complete and up to date as necessary for the purposes for which it is used. However, we also rely on you to tell us when your information changes. Keeping your information accurate and up-to-date allows us to continue to offer you the highest quality service.

- Accessing Your Information

- You have the right to access your personal information we hold about you. Much of your information is available to you through your account statements, by visiting the branch or office you deal with, by accessing your account online, or through telephone banking. If you require other information please see the “How To Contact Us” section below

Addressing Any Privacy Concerns

If you have any complaints, questions or concerns about this privacy policy or our privacy practices please let us know right away. If you choose to send us an e-mail, do not include sensitive information (e.g., card or account numbers).

How to Contact Us

If you want to update or correct any personal information we hold about you: You should contact us at support@cbcxmarkets.com or call any of our numbers on our “Contact Us” page. If you tell us that we have information about you that is obsolete or incorrect, we will update our records as necessary. When appropriate, we will correct any of your information which we may have given to a third party.

If you do not wish to receive marketing communications from the CBCX MARKETS Group: You should contact us at support@cbcxmarkets.com or call any of our numbers on our “Contact Us” page. When you withdraw your consent for marketing, we will update your file as quickly as possible. It may take some time for our records to reflect your choice as many records can only be changed during regular file updates and your choice may not be captured for a promotion already in progress.

If you want access to the personal information we hold about you: You should contact the branch or office where your account is held or talk to your CBCX MARKETS representative. We will require that you to put your request in writing and that you provide us with enough specific details in order to help us understand your request and conduct our search for your information. We will need you to verify your identity before searching for or providing you with access to your information. We will let you know in advance if there will be a fee to provide access to your information. A Schedule of Charges for services such as for photocopying documents can be found on our website on our Schedule of Charges pages. If you have a sensory disability you may request your information to be made available in an alternative format. There may be limits on your right to access your information. If we have obtained information about you from others, you can ask us for the source of that information. On request and where legally permitted, we will provide you with the names of third parties to whom we have given or may have given your information. However, this will not include service providers we have used to do work for us. It will also not include reports to revenue agencies or authorities or your information that has been provided for legal and regulatory obligations. Where we exchange your information with a credit bureau, if you wish to request access to a credit report we obtained about you from a credit bureau, we will give you a copy if we still have it on file. We will provide you with the name and address of the credit bureau we used as

they will have the most current information and can provide you with information on how to read the report. You may liaise with the credit bureau directly pertaining to the contents of your credit report.