

Carrick Just Capital Markets Limited Privacy Policy 23 September 2019

Owner: Compliance Manager

Approved by: Board

Review cycle: Yearly/September

Document History

Date	Remarks
16 October 2017	Version 1
30 October 2018	No Update
23 September 2019	No update

This policy describes how Carrick Just Capital Markets Limited ("CJC") collects, maintains, uses and discloses your personal information.

Collection of Information

Your information is collected when you contact us, enquire about us, open an account with us or establish a relationship with us. If you do not wish any or some information of your information to be collected, you have the right to do so. However, we may not be able to provide a service to you in this case. The information can be provided to us directly or through a third party.

Type of Information

The information may include but is not limited to name, date of birth, nationality, address, and telephone numbers, employment details and income details. Our internet service provider may also record your domain name, time of access, your IP address and the type of browser.

Use of Information

The information will be used for:

- The performance of due diligence on you for the purpose of your entering into a contract with us.
- Provision of our service to you.
- Complying with our obligations to you.
- Complying with regulations.
- Provision of information to you.
- Marketing and promotion of our products and services to you.

Security of the Information and disclosure

We will take reasonable means to protect the security of your information. We may, in the course of our business, disclose your information to:

- A person that is authorised by you for us to disclose to
- Our legal advisers.
- An agent or third party service provider.
- Our associated company.
- Companies that provide credit and background information.
- Tribunals, courts and any regulatory bodies that CJC operates under.
- Our auditors and accountants.
- Our compliance advisers.

 Any counterpart which we may engage or deal with in the provision of our service to you.

Telephone conversation

CJC may record your telephone conversations with us. These conversations are stored and are used for training and audit purposes. They are also used for settling disputes between you and CJC.

Email

CJC may occasionally send information about its products and services to the email that you provided to us. You warrant that you are the owner of the email and have authority to use this mail. If you do not wish to receive information from us via email, please inform us.

Update of Information

The responsibility to update your information with CJC falls on you. You must inform us if there are any changes. If you do not do so, our services to you may be adversely affected.