

# Privacy policy statement (November 2023 edition)

ZKB Securities (UK) Ltd (“**ZKBUK**”) is incorporated in England & Wales as a private company limited by shares under the Companies Act 2006 with its registered office at Mutual House, 70 Conduit Street, London W1S 2GF, United Kingdom. ZKBUK is authorised and regulated by the Financial Conduct Authority (“**FCA**”) with firm reference number 922650.

This privacy policy statement is about how ZKBUK collects and processes personal information.

## 1. General

ZKBUK collects and processes your personal information where you are

- a representative (such as an employee or a director) of one of our customers or potential customers;
- a beneficial owner of one of our customers or potential customers;
- a representative (such as an employee or a director) of one of our suppliers or potential suppliers; or
- a visitor to our offices, websites, or events.

Personal information is information that relates to you or allows ZKBUK to identify you.

## 2. Scope of processing

### 2.1 Types of personal information processed

ZKBUK collects and processes as little personal information about you as is necessary.

If you are a representative or beneficial owner of one of ZKBUK’s customers or potential customers, ZKBUK may collect and process the following information about you:

- your name, addresses, and date of birth;
- “Know your customer” data necessary for the onboarding and monitoring of customers, which may include copies of your identity documents and other documents to validate your identity;
- your email addresses and telephone numbers;

- your employer’s name;
- recordings of telephone conversations between you and ZKBUK;
- your marketing preferences.

If you are a visitor to ZKBUK’s offices, websites, or events, ZKBUK may collect and process the following information about you:

- your name, and addresses;
- your email addresses and telephone numbers;
- your employer’s name;
- technical data regarding your use of ZKBUK’s websites, such as your IP addresses, your devices and browsers, and your activities while on its websites;
- your marketing preferences.

If you are a representative of one of ZKBUK’s suppliers or potential supplies, ZKBUK may collect and process the following information about you:

- your name, and addresses;
- your email addresses and telephone numbers;
- your employer’s name;
- recordings of telephone conversations between you and ZKBUK;
- your marketing preferences.

### 2.2 Sources of your personal information

ZKBUK may obtain personal information about you from the following sources:

- directly from you;
- from your employer (where your employer is a customer of ZKBUK or a supplier to ZKBUK);
- from financial service providers or exchanges;
- from credit reference agencies, government agencies, publicly accessible registers, and the providers of sanction lists maintained by HM Treasury, the UN, the SECO, and the EU.

### **2.3 Period for which your personal information is stored**

The period for which ZKBUK stores your personal information is determined according to our statutory record-keeping obligations, the purpose for which we process your personal information, and the possibility of legal or regulatory claims that might be brought against ZKBUK.

### **2.4 Purposes for processing your personal information**

ZKBUK processes your personal information for the following reasons:

- customer registration;
- management and administration of ZKBUK's relationships with its customers, suppliers, and visitors;
- product and business development;
- risk management, including credit and operational risk, and fraud risk;
- marketing and market research;
- compliance with statutory and regulatory disclosure and reporting obligations;
- compliance with law, including the orders of courts and regulatory bodies;
- protecting ZKBUK's interests in legal and regulatory proceedings;
- protecting the security of ZKBUK, its employees, and its customers.

### **2.5 Lawful bases for the processing of your personal information**

ZKBUK relies on the following lawful bases for the processing of your personal information:

- ZKBUK has a legitimate interest;
- ZKBUK has a legal obligation;
- ZKBUK needs to perform a public task;
- you have consented (note that you can withdraw your consent at any time by contacting ZKBUK's compliance officer – see section 4 below).

### **2.6 Sharing of your personal information**

ZKBUK may share your personal information with:

- other parties involved in the transactions and trading that ZKBUK engages in as part of its services to customers (including affiliates of ZKBUK, counterparties to its transactions and trades, exchanges, clearing houses, depositaries, and custodians);

- government agencies and regulatory bodies in accordance with statutory and regulatory obligations, such as the Financial Conduct Authority, the European Securities and Markets Authority, the National Crime Agency, the Information Commissioner and the Financial Ombudsman Service, and including government agencies and regulatory bodies of affiliates of ZKBUK such as FINMA and the Swiss National Bank;
- external organisations, including affiliates of ZKBUK, that provide ordinary business and IT services to ZKBUK, including services for fraud prevention, hosting and securing our information systems and our CRM databases, marketing, email hosting, data backups, ID verification, and sanction lists verification (ZKBUK will not permit these suppliers to use your personal information for their own purposes);
- a new owner or potential new owner of ZKBUK's business where ZKBUK is considering or decides to sell its business (your information will be transferred to the new owner to enable the continuation of the business).

Where ZKBUK shares your personal information, this may sometimes be with organisations based in countries outside the UK and the European Economic Area. This international transfer of your personal information will be undertaken in compliance with applicable data protection law, and will be generally under standard contractual terms approved by the European Commission.

## **3. Data security**

ZKBUK protects the privacy of individuals in line with applicable data protection law. ZKBUK takes numerous precautions to ensure this, such as the implementation of technical and organisational security measures (e.g. the use of firewalls, personal passwords as well as encryption and authentication technologies, access restrictions, awareness-raising and training of employees, appointing a data protection adviser).

## **4. Rights**

You have the following rights regarding your personal information (subject to certain limitations and exceptions):

- to require ZKBUK to provide you with a copy of your personal information, and further details about its use of your personal information;

- to require ZKBUK to correct inaccuracies in your personal information;
- to require ZKBUK to erase your personal information or to restrict its use;
- to object to ZBUC's use of your personal information;
- to require ZKBUK to transfer your personal information to a third party.

may be updated from time to time. In the event of such an amendment you will be informed in an appropriate manner depending on how ZKBUK usually communicates with you, for example via the website [www.zkb.co.uk](http://www.zkb.co.uk).

If you wish to exercise any of your rights, please write to ZKBUK together with a clearly legible copy of a valid official identity document (for example passport, identity card, driving licence) at the following address:

ZKB Securities (UK) Ltd.  
Attn. Compliance Officer  
Mutual House,  
70 Conduit Street  
London W1S 2GF  
United Kingdom

Where ZKBUK is processing your personal information on the lawful basis of consent, you can at any time withdraw your consent to this processing by writing to ZKBUK in the manner described above. Please note that withdrawal of consent only has effect for the future.

## 5. Complaints

If you have any queries regarding ZKBUK's data protection practices or if you wish to complain about them, you can do so by writing to:

ZKB Securities (UK) Ltd.  
Attn. Compliance Officer  
Mutual House,  
70 Conduit Street  
London W1S 2GF  
United Kingdom

If you are not satisfied with the ZKBUK's response, you can contact the Information Commissioner's Office (<https://ico.org.uk/>) which is our data protection supervisory authority.

## 6. Updating of the privacy policy statement

This privacy policy statement was last updated in November 2022. It explains in general terms the way your personal data is processed by ZKBUK. This privacy policy statement does not constitute a part of any contract between ZKBUK and you. This privacy policy statement