

GO Markets LLC

# Privacy Policy

VERSION: JUNE 2020

GO Markets LLC is incorporated in Saint Vincent and the Grenadines under the Business Companies (Amendment and Consolidation) Act, Chapter 149 of the revised laws of Saint Vincent and the Grenadines 2009. Business Company No: 332 LLC 2020.

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**GO MARKETS**

first choice for trading

### GO Markets LLC. - Privacy Policy

We recognise the importance of your privacy and understands your concerns about the security of your personal information. We are committed to ensuring that when you share information with us or we collect information about those who visit our websites, we do so in accordance with applicable privacy laws.

This Privacy Policy details how we generally collect, hold, use and disclose personal information and your rights in relation to the personal information that we hold about you.

GO MARKETS LLC (Business Company Number 332 LLC 2020 incorporated under Saint Vincent and the Grenadines Business Companies (Amendment and Consolidation) Act, Chapter 149 of the Revised Laws of Saint Vincent and the Grenadines 2009) and any reference to 'us', 'our', 'we' or 'GO Markets' in this Privacy Policy is a reference to GO Markets LLC (Business Company Number 332 LLC 2020) and the brand names attributed to us (such as GO Markets) as the context requires unless otherwise stated.

#### Your consent

By providing us with information about yourself through any of our websites, application forms, via telephone or otherwise, you consent to the collection, use, disclosure and transfer of that information as set out in this Privacy Policy. By using our websites, you also consent to our use of cookies as set out in this Privacy Policy.

If you apply to open a trading account, your application form (whether written or electronic, or in any other form (including verbal) will constitute your express consent to the use and (in certain circumstances) disclosure of your personal information.

Your use of our online services or your provision of personal information to us constitutes your acceptance of the terms of this Privacy Policy.

#### Personal information

The types of personal information or personal data we may collect about you include:

- your name, your title;
- your contact details, including email address, mailing address, street address and/or telephone number;
- your age and/or date of birth;
- your drivers' licence number;
- your employment details;
- your tax file number;
- financial information including your average taxable income for the last three years, your statement of income, assets and liabilities;
- trading statements
- details of your nominated bank account;
- your preferences and/or opinions;

- information you provide to us through customer surveys;
- details of products and services we have provided to you and/or that you have enquired about, and our response to you;
- your browser session and geo-location data, device and network information, statistics on page views and sessions, acquisition sources, search queries and/or browsing behaviour;
- information about your access and use of our Site, including through the use of Internet cookies, your communications with our Site, the type of browser you are using, the type of operating system you are using and the domain name of your Internet service provider;
- additional personal information that you provide to us, directly or indirectly, through your use of our Site, associated applications, associated social media platforms and/or accounts from which you permit us to collect information; and
- any other personal information requested by us and/or provided by you or a third party.

We may collect these types of personal information directly from you or from third parties.

### How we collect information

We obtain most of the information directly from you through application forms or telephone conversations, and from maintaining records of information obtained in the course of ongoing customer service. We may also obtain information from other sources, such as via identity checks.

We may also obtain information about you through your use of our websites, apps or through the use of cookies on our websites.

Sometimes we may ask for other information voluntarily (including through market research, surveys or special offers) so that we can improve our service or better cater to the wider needs of our current and future clients.

We may record communications that we have with you in relation to the services we provide to you and our relationship with you. These recordings may be in electronic format, by telephone, in person or otherwise and will be our sole property, constituting evidence of the communications between us. Such telephone conversations may be recorded without the use of a warning tone or other notice.

If you choose not to provide the information we request, we may not be able to provide you with the product or service you need or open your trading account.

### Use of personal information

We may collect, hold, use and disclose personal information for the following purposes:

- to enable you to access and use our Site, associated applications and associated social media platforms;
- to contact and communicate with you;
- for internal record keeping, know your customer and administrative purposes;
- for analytics, market research and business development, including to operate and improve our Site, associated applications and associated social media platforms;

- for advertising and marketing, including to send you promotional information about our products and services and information about third parties that we consider may be of interest to you;
- to comply with our legal obligations and resolve any disputes that we may have; and
- to consider your employment application.

Where we share your personal information in the ways set out above, you acknowledge and understand that this may result in your personal information being sent to other jurisdictions outside Saint Vincent and the Grenadines. Where this occurs, we shall make reasonable attempts to extract an undertaking from the overseas recipients that they will comply with privacy laws and the ability to enforce privacy laws or any other contractual privacy obligation in relation to any breach.

Privacy laws may not apply or be enforceable against some overseas recipients and we understand that you may choose not to disclose your personal information to us. If you choose not to provide the information however, we may not be able to open your trading account or provide you with the product or service you have requested.

### **Legal bases for processing (for European Economic Area users)**

If you are an individual in the European Economic Area (EEA), we collect and process information about you only where we have legal bases for doing so under applicable European Union laws. The legal bases depend on the services you use and how you use them. This means we collect and use your information only where:

- we need it to provide you with our services, provide customer support and personalised features and to protect the safety and security of our services;
- it satisfies a legitimate interest (which is not overridden by your data protection interests), such as for research and development, to market and promote our services and to protect our legal rights and interests;
- you give us consent to do so for a specific purpose; or
- we need to process your data to comply with a legal obligation.

If you have consented to our use of information about you for a specific purpose, you have the right to change your mind at any time, but this will not affect any processing that has already taken place. Where we are using your information because we or a third party (e.g. your employer) have a legitimate interest to do so, you have the right to object to that use though, in some cases, this may mean no longer using our services.

### **Disclosure of personal information to third parties**

We may disclose personal information to:

- third party service providers for the purpose of enabling them to provide their services, including (without limitation) IT service providers, data storage, web-hosting and server providers, debt collectors, maintenance or problem-solving providers, professional advisors and payment systems operators;
- credit reporting agencies (CRA), to determine whether personal information matches information held by the credit reporting agency and so that we can determine whether we can provide an account to you. Alternative means of verifying you are available on request. If we are unable to verify your identity using information held by the CRA, we will provide you with a notice to this effect and give you the opportunity to contact the CRA to update your information held by them or verify your identity using an alternative method acceptable to us;

- our employees, contractors and/or related entities;
- our existing or potential agents or business partners;
- anyone to whom our business or assets (or any part of them) are, or may (in good faith) be, transferred;
- credit reporting agencies, courts, tribunals and regulatory authorities, in the event you fail to pay for goods or services we have provided to you;
- courts, tribunals, regulatory authorities and law enforcement officers, as required by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights.
- third parties, including agents or sub-contractors, who assist us in providing information, products, or services to you. This may include parties located, or that store data, outside of Saint Vincent and the Grenadines including in the United States; and
- third parties to collect and process data, such as Google Analytics or other relevant businesses. This may include parties that store data outside of Saint Vincent and the Grenadines including in the United States.

The third party will only process your personal information in accordance with written instructions from us. When we refer to 'processing' in this clause and this Privacy Policy in general, we mean any operation or set of operations which is performed on personal information, whether or not by automated means, such as collecting, recording, organising, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available personal information.

By providing us with personal information, you consent to the disclosure of your personal information to any third party we may use who reside outside Saint Vincent and the Grenadines and, if you are an individual located in the EEA, to third parties that reside outside the EEA.

Where the disclosure of your personal information is subject to GDPR, you acknowledge that there are risks if the third party outside the EEA engages in any act or practice that would contravene the GDPR and where there is no adequacy decision in place with the country outside the EEA or appropriate safeguards in place with the third party.

### The security and storage of your information

We are committed to ensuring that the personal information we collect is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures such as the pseudonymisation and encryption of personal information, to safeguard and secure personal information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.

We cannot guarantee the security of any information that is transmitted to or by us over the Internet. The transmission and exchange of information is carried out at your own risk. Although we take measures to safeguard against unauthorised disclosures of information, we cannot assure you that the personal information we collect will not be disclosed in a manner that is inconsistent with this Privacy Policy.

### Restrictions on sensitive information

Sensitive information is a sub-set of personal information that is given a higher level of protection. **Sensitive information** means information relating to your racial or ethnic origin, political opinions, religion, trade union or other professional associations

or memberships, philosophical beliefs, sexual orientation, sexual practices or sex life, criminal records, health information or biometric information.

We do not currently collect sensitive information from you. However, if we do so, we will not collect sensitive information from you without first obtaining your consent.

Provided you consent, your sensitive information may only be used and disclosed for purposes relating to the primary purpose for which the sensitive information was collected.

Sensitive information may also be used or disclosed if required or authorised by law.

### **Our responsibilities as a 'controller' under the GDPR**

Controllers are defined by the GDPR as natural or legal persons, a public authority, agency or other body to which personal information or personal data has been disclosed, whether via a third party or not, and who determines the purposes and means of processing personal information. We are a controller under the GDPR as we collect, use and store your personal information to enable us to provide you with our goods and/or services.

As a controller, we have certain obligations under the GDPR when collecting, storing and using the personal information of individuals based in the EEA. If you are an individual located in the EEA, your personal data will:

- be processed lawfully, fairly and in a transparent manner by us;
- only be collected for the specific purposes we have identified in the 'collection and use of personal information' clause above and personal information will not be further processed in a manner that is incompatible with the purposes we have identified;
- be collected in a way that is adequate, relevant and limited to what is necessary in relation to the purpose for which the personal information is processed;
- be kept up to date, where it is possible and within our control to do so (please let us know if you would like us to correct any of your personal information);
- be kept in a form which permits us to identify you, but only for so long as necessary for the purposes for which the personal data was collected; and
- be processed securely and in a way that protects against unauthorised or unlawful processing and against accidental loss, destruction or damage.

We also apply these principles to the way we collect, store and use the personal information of our clients. Specifically, we have the following measures in place, in accordance with the GDPR:

- Data protection policies: We have internal policies in place which set out where and how we collect personal information, how it is stored and where it goes after we get it, in order to protect your personal information.
- Right to ask us to erase your personal information: You may ask us to erase personal information we hold about you.
- Right to ask us to restrict data processing: You may ask us to limit the processing of your personal information where you believe that the personal information we hold about you is wrong (to give us enough time to verify if the information needs to be changed), or where processing data is unlawful and you request us to restrict the processing of personal information rather than it being erased.

- Notification of data breaches: We will comply with the GDPR in respect of any data breach.

### Your rights and controlling your personal information

**Choice and consent:** Please read this Privacy Policy carefully. By providing personal information to us, you consent to us collecting, holding, using and disclosing your personal information in accordance with this Privacy Policy. You must be 18 years and over to use our Site. You do not have to provide personal information to us, however, if you do not, it may affect your use of this Site or the products and/or services offered on or through it.

**Information from third parties:** If we receive personal information about you from a third party, we will protect it as set out in this Privacy Policy. If you are a third party providing personal information about somebody else, you represent and warrant that you have such person's consent to provide the personal information to us.

**Restrict:** You may choose to restrict the collection or use of your personal information. If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by contacting us using the details below. If you ask us to restrict how we process your personal information, we will let you know how the restriction affects your use of our Site or products and services.

**Access and data portability:** You may request details of the personal information that we hold about you. You may request a copy of the personal information we hold about you. Where possible, we will provide this information in CSV format or other easily readable machine format. You may request that we erase the personal information we hold about you at any time. You may also request that we transfer this personal information to another third party (data portability).

**Correction:** If you believe that any information, we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, please contact us using the details below. We will take reasonable steps to correct any information found to be inaccurate, incomplete, misleading or out of date.

**Complaints:** If you believe that we have breached the Privacy Principles and wish to make a complaint, please contact us using the details below and provide us with full details of the alleged breach. We will promptly investigate your complaint and respond to you, in writing, setting out the outcome of our investigation and the steps we will take to deal with your complaint. You also have the right to contact the relevant authorities if you wish to make a complaint:

#### Unsubscribe:

To unsubscribe from our e-mail database or opt-out of communications which includes marketing communications, please contact us using the details below or opt-out using the opt-out facilities provided in the communication. If you wish to unsubscribe from all other communications such as notices about public holidays and trading hours, please contact us using the details below.

#### "Do Not Call" Register:

Unless you ask us not to contact you about our products or services and not to disclose your information to others for that purpose, by accessing our website and applying for a demo or live account, you consent to us contacting you via telephone while you hold any product or receive any services from us. This is notwithstanding registration at any time of your telephone number on the 'do not call' register.

### Storage and security

We are committed to ensuring that the personal information we collect is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures such as the pseudonymisation and encryption of personal information, to safeguard and secure personal information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.

We cannot guarantee the security of any information that is transmitted to or by us over the Internet. The transmission and exchange of information is carried out at your own risk. Although we take measures to safeguard against unauthorised disclosures of information, we cannot assure you that the personal information we collect will not be disclosed in a manner that is inconsistent with this Privacy Policy.

### What happens if we make changes to this Policy?

If we change this Privacy Policy we will post the changes on this website, may place notices on other pages of this website, or may include notification of such changes in email communications so that you may at all times be aware of any changes to the information we collect and how we use it. The changes will take effect as soon as they are posted on our websites or you are notified in some other way (whichever occurs first).

### Cookies and web beacons

We may use cookies on our Site from time to time. Cookies are text files placed in your computer's browser to store your preferences. Cookies, by themselves, do not tell us your email address or other personally identifiable information. However, they do allow third parties, such as Google and Facebook, to cause our advertisements to appear on your social media and online media feeds as part of our retargeting campaigns. If and when you choose to provide our Site with personal information, this information may be linked to the data stored in the cookie.

We may use web beacons on our Site from time to time. Web beacons (also known as Clear GIFs) are small pieces of code placed on a web page to monitor the visitor's behaviour and collect data about the visitor's viewing of a web page. For example, web beacons can be used to count the users who visit a web page or to deliver a cookie to the browser of a visitor viewing that page.

We may use Google Analytics to collect and process data. To find out how Google uses data when you use third party websites or applications, please see [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/) or any other URL Google may use from time to time.

### Direct marketing

We may use your personal information to offer you products and services that we believe may interest you. We will not do this if you tell us not to. We will not provide your information to non-Group entities for marketing purposes.

If you do not wish to receive marketing offers from us, you can let us know by emailing us at [marketing@gomarkets.vc](mailto:marketing@gomarkets.vc).

### Hyperlinks

Our websites may contain hyperlinks that link to other sites, and other sites may contain links to our sites. These websites



that may be linking to or from our sites may have their own privacy policies. Our Privacy Policy applies exclusively to us and information collected by us. We are not responsible for the privacy policies or the content of the sites you link to, nor do we have control over the use or security of information provided by you or collected by those sites. If you choose to link to one of these websites, you may be asked to supply registration or other information. It is important that you realise this information is going to a third-party. Because of this, you should become familiar with that site's privacy policy and how information you share with that site will be treated.

### How to contact us

If you would like more information about how we manage your personal information or if you wish to change your contact information, please contact us or write to us, at the following contact details:

#### Privacy Officer

Email: [compliance@gomarkets.vc](mailto:compliance@gomarkets.vc)

The "Contact Us" page of our Website provides our business addresses and telephone numbers for clients from a number of countries and an international telephone number for clients from other countries.

Our registered address is: First Floor, First St. Vincent Bank Ltd, PO Box 1574, James Street, Kingstown, VC0100, Saint Vincent and the Grenadines.

### Concerns about Your Privacy

If you have any concerns about any breach or potential breach of your privacy, please contact our Privacy Officer in writing via email or post at the above address. We will make every effort to resolve your complaint internally and as soon as practicable and in any event within 45 days from receipt of your complaint.

If you are not satisfied with our response, or have a complaint, you may lodge a complaint in accordance with Our dispute resolution process, please contact us or write to us, at the following contact details:

#### Complaints Officer

Email: [compliance@gomarkets.vc](mailto:compliance@gomarkets.vc)

The "Contact Us" page of our Website provides our business addresses and international toll-free telephone numbers for clients from a number of countries and an international telephone number for clients from other countries.

Our registered address is: First Floor, First St. Vincent Bank Ltd, PO Box 1574, James Street, Kingstown, VC0100, Saint Vincent and the Grenadines.