Privacy Notice

ICM Capital Limited is authorised and regulated by the Financial Conduct Authority (FCA) Register Number: 520965.
Registered address: ICM Capital Limited, Level 30, 122 Leadenhall Street, London EC3V 4AB, United Kingdom.

YOUR **INVESTMENT HOUSE**

Contents

Privacy Notice

At ICM Capital, we are committed to maintaining the highest standards of integrity. In the course of our business, it is necessary to collect Personal Information about our potential clients. We take this activity seriously and seek to provide fair, secure and appropriate methods for the handling of Personal Information. All such activities are intended to be consistent with both generally accepted privacy ethics and standard business practices. Your Personal Information may be shared with a limited number of trusted partners and/or affiliates of ICM for the purposes of providing financial services.

If you have any questions or comments about ICM Capital Privacy Policy, you can contact our Customer Support Team: support@ICMCapital.co.uk or +44 207 634 9770.

Personally Identifiable Information

ICM Capital shall process your personal data as a Data Processor when you specifically opt-in and provide us with your consent, during your application to open a Metatrader 4 account. ICM Capital has a lawful base for processing your data, and it is for the following reason; 'processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into the contract.'

If you open an ICM Capital Metatrader 4 account, you will be asked for information regarding your name and address, employment and salary details. As part of the Money Laundering Regulations 2017, and ICM Capital's regulatory requirements with the Financial Conduct Authority (FCA), we are required to establish proof of your identity and address during the on-boarding stage. This process is conducted mainly by ICM Capital by requesting, and processing copies of your personal identifiable information, but also involves the use of third parties who conduct electronic verifications on our behalf. You might be asked to supply additional information to support any unsuccessful verification attempts.

Where stated we may use the personal information you provide to contact you in the future about ICM Capital products and services. We only hold data which is necessary to offer the services provided on our website.

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Third Party Sites

This website contains links to other websites. Please note that ICM Capital cannot be held responsible for the privacy policies of other websites. We encourage all visitors to be aware and read the privacy statements of every website that collects personally identifiable information.

ICM Capital can confirm that it has a strict policy of not sharing your Personal Identifiable Information with an unauthorized third party under any circumstances.

Privacy Statement Changes

ICM Capital may change this privacy statement at any time. If a change does occur, you will be notified accordingly, and where applicable your consent would be required. You are advised to read the statements so that you are satisfied with the privacy conditions under which   you provide ICM Capital with your personal information.

EU General Data Protection Regulation (GDPR)

ICM Capital as a Data Controller and Processor is bound to comply with the requirements and principles of GDPR in controlling and processing your personal identifiable information. ICM Capital is registered with the Information Commissioner's Office (ICO), who is the UK's independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals.

Retention of Records

We will keep Personal Information only as long as it is necessary and required to do so subject to FCA regulation, including for the purposes of updating the product or services or as required by law. The retention period of your personal identifiable information is for a minimum of 5 years. You have a right to request to erase your information, however this is subject to the 5-year retention period mentioned above.

When the Personal Information is no longer required, it will be destroyed either by shredding or other approved destruction methods to prevent unauthorized parties from gaining access to the information during and after the process.

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Your Rights

The GDPR provides the following rights for individuals:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling.

For further details on each of your rights, please visit the link here.

We will safeguard information in our custody

We have developed and will maintain security procedures to safeguard Personal Information against loss, theft, copying, and unauthorised disclosure, use or modification. Access to Personal Information is restricted to employees and authorised service providers who need it to perform their work.

Right to Withdraw Consent

You have the right to withdraw your consent at any time, subject to meeting one of the following conditions:

- Your personal identifiable information to which has been processed by ICM Capital has surpassed the 5-year retention period;
- You do not have an open MetaTrader4 account; or
- You failed to open an MetaTrader4 account (for example due to being refused during the application stage).

If you meet one of the above conditions, you may contact us at any time and withdraw your consent.

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Right to lodge a complaint

You retain the right to lodge a complaint with the ICO if you believe or consider that the processing of your personal identifiable data by ICM Capital infringes the key principles of GDPR. We have provided a link to the ICO's website for their contact details.

Cookie Policy

What is a Cookie?

A cookie is a small text file of letters and numbers sent to your browser by a website you visit which is saved to your computer or mobile device. Our website uses cookies to distinguish you from other users of our website. It enables the website to remember your actions and preferences (such as login, language and other display) over a period of time, in order to help you navigate the website with ease.

How is your Personal Information collected by our website?

Personal Information may be submitted to both the public and private areas of our website. Personal Information may be submitted on our website in two areas:

Public Area

If you do provide your name and address on the public area of this website in order to request information about our products and services, you may voluntarily provide additional personal information. You will be asked to provide your Personal Information in this area for the purposes of registering with ICM Capital and opening an account with us.

Private Area

To ensure a good quality of service we may monitor and record any communication you have with us whether in writing, by phone or by electronic mail. E-mail is not encrypted to / from either the public or private areas of this website. ICM Capital recommends that you do not send us Personal Information by e-mail.

We use the following cookies:

1. **Essential**: these cookies are important to the underlying operation of the website, supporting important functionality such as shopping baskets and the technical operation of the website to

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ensure it performs how you would expect.

2. **Performance**: these cookies are used in the management of the site and include customer surveys, recording visitor numbers and other web analytics. Limited identifiable data may be collected.

3. **Marketing**: These cookies are used by us and our advertising partners to track visitors across websites to provide targeted ads that are more relevant to you. You may see these ads on our website and on other websites that you visit. They do not store personal information directly, but they will uniquely identify your browser and internet-enabled device.

You may block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

Name		Domain	Expires
ACCOUNT_BFESS		.hm.baidu.com	more than 10 years
projekktor_controlbar		.icmcapital.co.uk	6 months
__stid		.sharethis.com	1 year
mp_eb4c820161f6ead8054c9 4e14c144900_mixpanel		.sharethis.com	1 year
pubconsent-v2		.sharethis.com	1 year
Hm_lvt_d3894b7419a163785 eb99bbacfb4a964	Required	.icmcapital.co.uk	1 year
_gid		.icmcapital.co.uk	24h
UmbracoUICulture	Required	.icmcapital.co.uk	3years
__stidv		.sharethis.com	1 year
projekktor_controlbar		.icmcapital.co.uk	1 year
cc_cookie_accept	Required	.icmcapital.co.uk	6 months
Hm_lpvt_d3894b7419a16378 5eb99bbacfb4a964	Required	.icmcapital.co.uk	Session
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ASP.NET_SessionId	Required	.icmcapital.co.uk	Session
__zlcmid		.icmcapital.co.uk	1 year
euconsent-v2		.consensu.org	1 year

Cookie management

We ask for your consent to use such cookies, except for necessary cookies which are needed to run our website. If you click on "Change Settings" below, you are able to decide which cookies you want to consent to. By clicking "Accept All Cookies" you consent to all cookies from ICM Capital and our third-party collaborators. You can change or withdraw your consent at any time.

To find out more about cookies, including how to see what cookies have been set, visit www.aboutcookies.org.

If you do not want to accept cookies, you can change your browser settings so that cookies are not accepted. If you do this, please be aware that you may lose some of the functionality of this website.

Google Chrome

- At the top right of your browser, click the three vertical dots, then 'settings'
- Scroll to the bottom of the page and click 'advanced'
- Under 'privacy and security', click 'site settings'
- To enable cookies, head to the cookies section and tick 'allow sites to save and read cookie data (recommended)'. This option enables both first and third-party cookies
- To allow only first-party cookies, enable 'block third-party cookies'
- To disable cookies, click 'see all cookies and site data', then click 'remove all'

There are multiple levels of cookie enablement in Chrome. For more information, click here.

Microsoft Edge

- Click the three dots (…) at the top right of your browser
- Choose 'settings' and then 'view advanced settings'
- Under 'cookies' choose either 'don't block cookies' or 'block only third-party cookies'
- To disable cookies, click 'block all cookies'

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There are multiple levels of cookie enablement in Edge. For more information, <u>click here</u>.

Mozilla Firefox

- Click the menu button and choose 'content blocking'
- If 'standard' is selected, you are currently enabling cookies
- To block cookies, select 'custom' and click 'cookies' before selecting an option

There are multiple levels of cookie enablement in Firefox. For more information, <u>click here</u>.

Safari

- In the menu bar, select 'Safari', then choose 'preferences'
- Click on 'Privacy'
- To prevent trackers from using cookies to track you, select 'prevent cross-site tracking'
- To disable cookies, select 'block all cookies'

For more information, see the <u>Safari user guide</u>.

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