

1. INTRODUCTION

This Policy sets out the obligations of Smart Charts Ltd (referred to as “SMARTCHARTS” or “the Company”) regarding data protection and the rights of current, past and prospective staff, suppliers, clients, customers, and others with whom it has business or with whom it communicates (“data subjects”) in respect of their personal data under the General Data Protection Regulation (“the Regulation”). Other legislation may be applicable according to the jurisdiction in which an individual for whom we may process personal data may reside.

The Regulation defines “personal data” as any information relating to an identified or identifiable natural person (a data subject); an identifiable natural person is one who can be identified, directly or indirectly, by reference to an identifier such as a name, an identification number, name, email address, telephone number, postal address, IP address etc, and credit card numbers.

This Policy sets out the procedures that are to be followed when dealing with personal data. The procedures and principles set out herein must be followed at all times by SMARTCHARTS, its employees, agents, contractors, or other parties working on behalf of the Company.

SMARTCHARTS is committed to ensuring that it treats personal information lawfully and places high importance on the correct, lawful, and fair handling of all personal data, respecting the legal rights, privacy, and trust of all individuals with whom it deals.

2. THE DATA PROTECTION PRINCIPLES

This Policy aims to ensure compliance with the Regulation. The Regulation sets out the following principles with which any party handling personal data must comply. All personal data must be:

- a) processed lawfully, fairly, and in a transparent manner in relation to the data subject;
- b) collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be incompatible with the initial purposes;
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed;

- d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which they are processed, is erased or rectified without delay;
- e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organizational measures required by the Regulation in order to safeguard the rights and freedoms of the data subject;
- f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.
- g) Demonstrably accounted for with accurate records of all processing activities, please refer to section 9 of this policy.

3. LAWFUL, FAIR, AND TRANSPARENT DATA PROCESSING

The Regulation seeks to ensure that personal data is processed lawfully, fairly, and transparently, without adversely affecting the rights of the data subject. The Regulation states that processing of personal data shall be lawful if at least one of the following applies:

- a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- b) processing is necessary for the performance of a contract to which the data subject is a party or to take steps at the request of the data subject prior to entering into a contract;
- c) processing is necessary for compliance with a legal obligation to which the controller is subject;
- d) processing is necessary to protect the vital interests of the data subject or of another natural person;
- e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;

- f) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the fundamental rights and freedoms of the data subject which require protection of personal data, where the data subject is a child.
- g) SmartCharts will initially process the personal data of potential and actual customers using their consent (a). Once a prospective customer becomes an actual customer the lawful basis will be contractual obligation (b). For the avoidance of doubt, this condition provides for the sharing of the data with other companies details of which are included in the terms of the contract.

4. PROCESSED FOR SPECIFIED, EXPLICIT AND LEGITIMATE PURPOSES

To conduct its normal business, SMARTCHARTS collects and uses certain types of personal information about living individuals. This personal data will be processed according to the legal basis of consent, contractual relationships with data subjects, compliance with regulated activities in which SMARTCHARTS is engaged and for the purposes of legitimate interests pursued by SMARTCHARTS , for example processing data to help improve the Company's products and services.

In particular:-

4.1 SMARTCHARTS collects and processes the personal data set out in Appendix C of this Policy. This may include personal data received directly from data subjects (for example, contact details used when a data subject communicates with us) and data received from third parties.

4.2 SMARTCHARTS only processes personal data for the specific purposes set out in Appendix A of this Policy (or for other purposes expressly permitted by the Regulation). The purposes for which we process personal data will be informed to data subjects at the time that their personal data is collected, where it is collected directly from them, or as soon as possible (not more than one calendar month) after collection where it is obtained from a third party.

5. ADEQUATE, RELEVANT AND LIMITED DATA PROCESSING

SMARTCHARTS will only collect and process personal data for and to the extent necessary for the specific purpose(s) informed to data subjects as under Part 4, above.

6. ACCURACY OF DATA AND KEEPING DATA UP TO DATE

SMARTCHARTS shall ensure that all personal data collected and processed is kept accurate and up-to-date. The accuracy of data shall be checked when it is collected and at regular intervals thereafter. Where any inaccurate or out-of-date data is found, all reasonable steps will be taken without delay to amend or erase that data, as appropriate.

7. TIMELY PROCESSING

SMARTCHARTS shall not keep personal data for any longer than is necessary in light of the purposes for which that data was originally collected and processed. When the data is no longer required, all reasonable steps will be taken to erase it without delay. SMARTCHARTS's data retention policy is located at Appendix

8. SECURE PROCESSING

SMARTCHARTS shall ensure that all personal data collected and processed is kept secure and protected against unauthorised or unlawful processing and against accidental loss, destruction or damage. Further details of the data protection and organisational measures which shall be taken are provided in Parts 22 and 23 of this Policy.

9. ACCOUNTABILITY

9.1 SMARTCHARTS, as Data Controller provides a structure that acknowledges the responsibilities and accountability for data protection. This is detailed in Appendix B.

9.2 SMARTCHARTS keeps internal records of all personal data collection, holding, and processing, which incorporate the following information:

- a) SMARTCHARTS's name and details, responsible person(s) for data protection (see Appendix B), and any applicable third-party data processors (see Appendix D);
- b) The purposes for which SMARTCHARTS processes personal data (see Appendix A);
- c) Details of the categories of personal data collected, held, and processed by the Company; and the categories of data subject to which that personal data relates; (See Appendix C)
- d) Details (and categories) of any third parties that will receive personal data from SMARTCHARTS; (See Appendix C)
- e) Details of any transfers of personal data to non-EEA countries including all mechanisms and security safeguards;
- f) Details of how long personal data will be retained by SMARTCHARTS (see Appendix E); and
- g) Detailed descriptions of all technical and organizational measures taken by SMARTCHARTS to ensure the security of personal data (refer to the IT Security Policy).

10. PRIVACY IMPACT ASSESSMENTS (DPIA)

SMARTCHARTS shall carry out Privacy Impact Assessments when and as required under the Regulation. The provision of an Privacy Impact Assessment shall be overseen by SMARTCHARTS's Compliance Team and shall address the following areas of importance:

10.1 The purpose(s) for which personal data is being processed and the processing operations to be carried out on that data;

10.2 Details of the legitimate interests being pursued by SMARTCHARTS;

10.3 An assessment of the necessity and proportionality of the data processing with respect to the purpose(s) for which it is being processed;

10.4 An assessment of the risks posed to individual data subjects; and

10.5 Details of the measures in place to minimise and handle risks including safeguards, data security, and other measures and mechanisms to ensure the protection of personal data, sufficient to demonstrate compliance with the Regulation.

11. THE RIGHTS OF DATA SUBJECTS

The Regulation sets out the following rights applicable to data subjects:

- a) The right to be informed;
- b) The right of access;
- c) The right to rectification;
- d) The right to erasure (also known as the 'right to be forgotten');
- e) The right to restrict processing;
- f) The right to data portability;
- g) The right to object;
- h) Rights with respect to automated decision-making and profiling.

Attached at Appendix F is the process for a data subject to follow to exercise one of its rights in respect of 11 a) – h).

12. KEEPING DATA SUBJECTS INFORMED

12.1 SMARTCHARTS shall ensure that the following information is provided – by reference to this Data Protection Policy – to every data subject when personal data is collected:

- a) Details of SMARTCHARTS including, but not limited to, the identity of any appointed Data Protection Officer;
- b) The purpose(s) for which the personal data is being collected and will be processed (as detailed in Appendix A of this Policy) and the legal basis justifying that collection and processing;
- c) Where applicable, the legitimate interests upon which SMARTCHARTS is justifying its collection and processing of the personal data;
- d) Where the personal data is not obtained directly from the data subject, the categories of personal data collected and processed;
- e) Where the personal data is to be transferred to one or more third parties, details of those parties;

- f) Where the personal data is to be transferred to a third party that is located outside of the European Economic Area (the “EEA”) or the EU do not consider to be adequate, details of that transfer, including but not limited to the safeguards in place (see Part 21 of this Policy for further details concerning such third country data transfers);
- g) Details of the length of time the personal data will be held by SMARTCHARTS (or, where there is no predetermined period, details of how that length of time will be determined);
- h) Details of the data subject’s rights under the Regulation;
- i) Details of the data subject’s right to withdraw their consent to SMARTCHARTS’s processing of their personal data at any time;
- j) Details of the data subject’s right to complain to the Information Commissioner’s Office (the ‘supervisory authority’ under the Regulation);
- k) Where applicable, details of any legal or contractual requirement or obligation necessitating the collection and processing of the personal data and details of any consequences of failing to provide it;
- l) Details of any automated decision-making that will take place using the personal data (including but not limited to profiling), including information on how decisions will be made, the significance of those decisions and any consequences.

12.2 The information set out above in Part 12.1 shall be provided to the data subject at the following applicable time:

12.2.1 Where the personal data is obtained from the data subject directly, at the time of collection;

12.2.2 Where the personal data is not obtained from the data subject directly (i.e. from another party):

- a) If the personal data is used to communicate with the data subject, at the time of the first communication; or
- b) If the personal data is to be disclosed to another party, before the personal data is disclosed; or
- c) In any event, not more than one month after the time at which SMARTCHARTS obtains the personal data.

13. DATA SUBJECT ACCESS

13.1 A data subject may make a subject access request (“SAR”) at any time to find out more about the personal data which SMARTCHARTS holds about them. SMARTCHARTS is normally required to respond to SARs within one month of receipt (this can be extended by up to two

months in the case of complex and/or numerous requests, and in such cases the data subject shall be informed of the need for the extension).

13.2 All subject access requests received must be forwarded to the name of your Data Protection officer.

13.3 SMARTCHARTS will not charge a fee for the handling of normal SARs. SMARTCHARTS reserves the right to charge reasonable fees for additional copies of information that has already been supplied to a data subject, and for requests that are manifestly unfounded or excessive, particularly where such requests are repetitive.

13.4 All SARs will be handled in accordance with the guidance of the ICO>

14. RECTIFICATION OF PERSONAL DATA

14.1 If a data subject informs SMARTCHARTS that personal data held by SMARTCHARTS is inaccurate or incomplete, requesting that it be rectified, the personal data in question shall be rectified, and the data subject informed of that rectification, within one month of receipt the data subject's notice (this can be extended by up to two months in the case of complex requests, and in such cases the data subject shall be informed of the need for the extension).

14.2 In the event that any affected personal data has been disclosed to third parties, those parties shall be informed of any rectification of that personal data.

15. ERASURE OF PERSONAL DATA

15.1 Data subjects may request that SMARTCHARTS erases the personal data it holds about them in the following circumstances:

- a) It is no longer necessary for SMARTCHARTS to hold that personal data with respect to the purpose for which it was originally collected or processed;
- b) The data subject wishes to withdraw their consent to SMARTCHARTS holding and processing their personal data;
- c) The data subject objects to SMARTCHARTS holding and processing their personal data (and there is no overriding legitimate interest to allow SMARTCHARTS to continue doing

so) (see Part 18 of this Policy for further details concerning data subjects' rights to object);

- d) The personal data has been processed unlawfully;
- e) The personal data needs to be erased for SMARTCHARTS to comply with a legal obligation

15.2 Unless SMARTCHARTS has reasonable grounds to refuse to erase personal data, all requests for erasure shall be complied with, and the data subject informed of the erasure, within one month of receipt of the data subject's request (this can be extended by up to two months in the case of complex requests, and in such cases the data subject shall be informed of the need for the extension).

15.3 In the event that any personal data that is to be erased in response to a data subject request has been disclosed to third parties, those parties shall be informed of the erasure (unless it is impossible or would require disproportionate effort to do so).

16. RESTRICTION OF PERSONAL DATA PROCESSING

16.1 Data subjects may request that SMARTCHARTS ceases processing the personal data it holds about them. If a data subject makes such a request, SMARTCHARTS shall retain only the amount of personal data pertaining to that data subject that is necessary to ensure that no further processing of their personal data takes place.

16.2 In the event that any affected personal data has been disclosed to third parties, those parties shall be informed of the applicable restrictions on processing it (unless it is impossible or would require disproportionate effort to do so).

17. DATA PORTABILITY

17.1 SMARTCHARTS processes personal data using automated means to ensure compliance with environmental legislation.

17.2 Where data subjects have given their consent to SMARTCHARTS to process their personal data in such a manner or the processing is otherwise required for the performance of a contract between SMARTCHARTS and the data subject, data subjects have the legal right under the Regulation to receive a copy of their personal data and to use it for other purposes (namely transmitting it to other data controllers, e.g. other organizations).

17.3 To facilitate the right of data portability, SMARTCHARTS shall make available all applicable personal data to data subjects in one of the following formats:

- CSV files;
- PDF files
- Other multimedia, electronic (soft) or hard copy files.

17.4 Where technically feasible, if requested by a data subject, personal data shall be sent directly to another data controller.

17.5 All requests for copies of personal data shall be complied with within one month of the data subject's request (this can be extended by up to two months in the case of complex requests in the case of complex or numerous requests, and in such cases the data subject shall be informed of the need for the extension).

18. OBJECTIONS TO PERSONAL DATA PROCESSING

18.1 Data subjects have the right to object to SMARTCHARTS processing their personal data based on legitimate interests (including profiling), direct marketing (including profiling), and processing for historical research and statistics purposes.

18.2 Where a data subject objects to SMARTCHARTS processing their personal data based on its legitimate interests, SMARTCHARTS shall cease such processing forthwith, unless it can be demonstrated that SMARTCHARTS's legitimate grounds for such processing override the data subject's interests, rights and freedoms; or the processing is necessary for the conduct of legal claims.

18.3 Where a data subject objects to SMARTCHARTS processing their personal data for direct marketing purposes, SMARTCHARTS shall cease such processing forthwith.

18.4 Where a data subject objects to SMARTCHARTS processing their personal data for historical research and statistics purposes, the data subject must, under the Regulation, 'demonstrate grounds relating to his or her particular situation'. SMARTCHARTS is not required to comply if the research is necessary for the performance of a task carried out for reasons of public interest.

19. AUTOMATED DECISION- MAKING

19.1 In the event that SMARTCHARTS uses personal data for the purposes of automated decision-making and those decisions have a legal (or similarly significant effect) on data subjects, data subjects have the right to challenge to such decisions under the Regulation, requesting human intervention, expressing their own point of view, and obtaining an explanation of the decision from SMARTCHARTS.

20. PROFILING

Where SMARTCHARTS uses personal data for profiling purposes, the following shall apply:

- a) Clear information explaining the profiling will be provided, including its significance and the likely consequences;
- b) Appropriate mathematical or statistical procedures will be used;
- c) Technical and organizational measures necessary to minimise the risk of errors and to enable such errors to be easily corrected shall be implemented; and
- d) All personal data processed for profiling purposes shall be secured in order to prevent discriminatory effects arising out of profiling (see Parts 22 and 23 of this Policy for more details on data security).

21. INTERNATIONAL TRANSFER OF DATA

SMARTCHARTS may transfer personal data to countries who are not signatory to the GDPR for the following reasons:

- a) To provide the data subject by telephone and e-mail with details of SMARTCHARTS's events, products and services which is facilitated by Empower U Inc, a Company registered in the Philippines.
- b) SMARTCHARTS has entered into an agreement with Empower U Inc to ensure Empower U Inc upholds SMARTCHARTS's data protection and data privacy policies.
- c) SMARTCHARTS's Compliance Team will regularly hold training with Empower U Inc to ensure that it upholds this policy.

22. DATA PROTECTION MEASURES

SMARTCHARTS shall ensure that all its employees, agents, contractors, or other parties working on its behalf comply with the following when working with personal data:

- a) All emails containing personal data must be encrypted;
- b) Where any personal data is to be erased or otherwise disposed of for any reason (including where copies have been made and are no longer needed), it should be securely deleted and disposed of. Hardcopies should be shredded.
- c) Personal data may be transmitted over secure networks only; transmission over unsecured networks is not permitted in any circumstances;
- d) Personal data may not be transmitted over a wireless network if there is a wired alternative that is reasonably practicable;
- e) Personal data contained in the body of an email, whether sent or received, should be copied from the body of that email and stored securely. The email itself should be deleted. All temporary files associated therewith should also be deleted;
- f) Where Personal data is to be sent by facsimile transmission the recipient should be informed in advance of the transmission and should be waiting by the fax machine to receive the data;
- g) Where Personal data is to be transferred in hardcopy form it should be passed directly to the recipient or sent using Royal Mail or an equivalent postal service;
- h) No personal data may be shared informally and if an employee, agent, sub-contractor, or other party working on behalf of SMARTCHARTS requires access to any personal data that they do not already have access to, such access should be formally requested from the DPCO.
- i) All hardcopies of personal data, along with any electronic copies stored on physical, removable media should be stored securely in a locked box, drawer, cabinet or similar;
- j) No personal data may be transferred to any employees, agents, contractors, or other parties, whether such parties are working on behalf of the Company or not, without the authorisation of the DPCO.
- k) Personal data must be handled with care at all times and should not be left unattended or on view to unauthorised employees, volunteers, agents, sub-contractors or other parties at any time;

- l) If personal data is being viewed on a computer screen and the computer in question is to be left unattended for any period of time, the user must lock the computer and screen before leaving it;
- m) No personal data should be stored on any mobile device (including, but not limited to, laptops, tablets and smartphones), whether such device belongs to SMARTCHARTS or otherwise without formal written approval and, in the event of such approval, strictly in accordance with all instructions and limitations described at the time the approval is given, and for no longer than is absolutely necessary.
- n) No personal data should be transferred to any device personally belonging to an employee and personal data may only be transferred to devices belonging to agents, volunteers, contractors, or other parties working on behalf of SMARTCHARTS where the party in question has agreed to comply fully with the letter and spirit of this Policy and of the Regulation (which may include demonstrating to SMARTCHARTS that all suitable technical and organisational measures have been taken);
- o) All personal data stored electronically should be encrypted and backed up weekly with back-ups stored offsite.
- p) All electronic copies of personal data should be stored securely using passwords and data encryption;
- q) All passwords used to protect personal data should be changed regularly and should not use words or phrases that can be easily guessed or otherwise compromised. All passwords must contain a combination of uppercase and lowercase letters, numbers, and symbols;
- r) Under no circumstances should any passwords be written down or shared between any employees, volunteers, agents, contractors, or other parties working on behalf of SMARTCHARTS, irrespective of seniority or department. If a password is forgotten, it must be reset using the applicable method. IT staff do not have access to passwords;
- s) Where personal data held by SMARTCHARTS is used for marketing purposes, it shall be the responsibility of the Head of Marketing, to ensure that no data subjects have added their details to any marketing preference databases including, but not limited to, the Telephone Preference Service, the Mail Preference Service, the Email Preference Service, and the Fax Preference Service. Such details should be checked at least annually.

23. ORGANISATIONAL MEASURES

SMARTCHARTS shall ensure that the following measures are taken with respect to the collection, holding, and processing of personal data:

- a) All employees, volunteers, agents, contractors, or other parties working on behalf of SMARTCHARTS shall be made fully aware of both their individual responsibilities and SMARTCHARTS's responsibilities under the Regulation and under this Policy, and shall be provided with a copy of this Policy;
- b) Only employees, agents, sub-contractors, or other parties working on behalf of SMARTCHARTS that need access to, and use of, personal data in order to carry out their assigned duties correctly shall have access to personal data held by SMARTCHARTS;
- c) All employees, volunteers, agents, contractors, or other parties working on behalf of SMARTCHARTS handling personal data will be appropriately trained to do so;
- d) All employees, volunteers, agents, contractors, or other parties working on behalf of SMARTCHARTS handling personal data will be appropriately supervised;
- e) Methods of collecting, holding and processing personal data shall be regularly evaluated and reviewed;
- f) The performance of those employees, volunteers, agents, contractors, or other parties working on behalf of SMARTCHARTS handling personal data shall be regularly evaluated and reviewed;
- g) All employees, volunteers, agents, contractors, or other parties working on behalf of SMARTCHARTS handling personal data will be bound to do so in accordance with the principles of the Regulation and this Policy by contract;
- h) All agents, contractors, or other parties working on behalf of SMARTCHARTS handling personal data must ensure that any and all of their employees who are involved in the processing of personal data are held to the same conditions as those relevant employees of SMARTCHARTS arising out of this Policy and the Regulation;
- i) Where any agent, contractor or other party working on behalf of SMARTCHARTS handling personal data fails in their obligations under this Policy that party shall indemnify and hold harmless SMARTCHARTS against any costs, liability, damages, loss, claims or proceedings which may arise out of that failure.

24. DATA BREACH NOTIFICATION

24.1 All personal data breaches must be reported immediately to SMARTCHARTS by e-mail to info@smartchartsfx.com

24.2 If a personal data breach occurs and that breach is likely to result in a risk to the rights and freedoms of data subjects (e.g. financial loss, breach of confidentiality, discrimination, reputational damage, or other significant social or economic damage), the data protection officer must ensure that the Information Commissioner's Office is informed of the breach without delay, and in any event, within 72 hours after having become aware of it.

24.3 In the event that a personal data breach is likely to result in a high risk (that is, a higher risk than that described under Part 24.2) to the rights and freedoms of data subjects, the data protection officer must ensure that all affected data subjects are informed of the breach directly and without undue delay.

24.4 Data breach notifications shall include the following information:

- The categories and approximate number of data subjects concerned;
- The categories and approximate number of personal data records concerned;
- The name and contact details of SMARTCHARTS's data protection officer (or other contact point where more information can be obtained);
- The likely consequences of the breach;
- Details of the measures taken, or proposed to be taken, by SMARTCHARTS to address the breach including, where appropriate, measures to mitigate its possible adverse effects.

25. GENERAL TRAINING

SMARTCHARTS is responsible for ensuring that all of its employees, volunteers, associates, interns and contractors are aware of their personal responsibilities in relation to personal data, ensuring that it is properly protected at all times and is processed only in line with SMARTCHARTS's procedures.

To this end, SMARTCHARTS shall ensure that all of its employees are given appropriate and relevant training.

26. IMPLEMENTATION OF POLICY

This Policy shall be deemed effective as of 10th January 2023. The policy shall be reviewed at least annually and in event of significant changes to the Regulation.

To this end, SMARTCHARTS shall ensure that all of its employees are given appropriate and relevant training.

APPENDIX A

- SmartCharts is a software provider that has a proprietary financial markets analytical system called SmartCharts. Smart Charts also works with 3rd parties who deliver some services on behalf of Smart Charts.
- SmartCharts may from time to time markets and offer to the general public free promotional events that provide information on its education products and analytical tool subscription services. SmartChart's marketing activities collect data by way of implied consent to which all data subjects are asked to agree to and have the option to change their preferences at any time;
- Offers to the general public paid for education products and subscription services to its analytical tool. SMARTCHARTS provides contractual services for which data is processed to allow SMARTCHARTS to carry out its obligations under the contract and for the data subject to receive the products and services.
- When a data subject enters a contract for services for SMARTCHARTS they agree to sharing their data with 3rd party processors, including but not limited to Learn to Trade Ltd and Capital Index Ltd, so that relevant services under the agreement can be provided. The data subjects may change their preferences at any time.

APPENDIX B – SMARTCHARTS DATA PROTECTION RESPONSIBILITIES

SMARTCHARTS maintains the following structure in order to meet its responsibilities for the Regulation as well as operational management of data processing:-

COMPLIANCE TEAM

SMARTCHARTS will maintain a team with management oversight and responsibility for operational processes and maintenance of data protection policies and activities. The team will be made up of:-

EMEA CEO

DATA PROTECTION COMPLIANCE OFFICER

APPENDIX C – PERSONAL DATA

The following data may be collected, held and processed by SMARTCHARTS or may be processed a 3rd party supplier to SmartCharts:

TYPE OF DATA	LAWFUL REASON FOR PROCESSING	PROSPECTIVE CUSTOMER	CUSTOMER	STAFF
FIRST NAME	CONSENT OR CONTRACTUAL	Y	Y	Y
LAST NAME	CONSENT OR CONTRACTUAL	Y	Y	Y
GENDER	CONSENT OR CONTRACTUAL	N	Y	Y
E_MAIL ADDRESS	CONSENT OR CONTRACTUAL	Y	Y	Y
TELEPHONE NUMBER	CONSENT OR CONTRACTUAL	Y	Y	Y
MOBILE NUMBER	CONSENT OR CONTRACTUAL	Y	Y	Y
IP ADDRESS	CONSENT	N	Y	N
DATE OF BIRTH	CONSENT OR LEGAL OBLIGATION	N	Y	Y

POSTAL ADDRESS	CONSENT OR CONTRACTUAL	N	Y	Y
CREDIT /DEBIT CARD	CONTRACTUAL	N	Y	N
BANK ACCOUNT DETAILS	CONTRACTUAL	N	YN	Y
NATIONAL INSURANCE NUMBER	CONTRACTUAL	N	N	Y
NATIONALITY	CONTRACTUAL	N	N	Y
NEXT OF KIN	CONTRACTUAL	N	N	Y

APPENDIX D – LIST OF DATA PROCESSORS OF SMARTCHARTS

- Salesforce
- SC Database and payments database
- Capital Index Ltd
- Learn to Trade Ltd
- Various 3rd party payment systems

APPENDIX E- RETENTION TABLE

Category	Retention	DATA TYPE RETAINED	Unsubscribe Option	FREQUENCY OF PURGE
Advanced Programme Customer	7 years from date of invoice	Documents required for audit e.g. invoices, receipts, payments history	N	1 YEAR
	6 years from date of enrolment on to programme	Salesforce customer information		
	90 days	Outlook 365 Default policy for e-mails		
Digital Learn Forex Customer	7 years from date of invoice	Documents required for audit e.g. invoices, receipts, payments history	N	1 YEAR
	6 years from date of enrolment on to programme	Salesforce customer information		
	90 days	Outlook 365 Default policy for e-mails		
Subscriber	7 years from end date of subscription	Documents required for audit e.g. invoices, receipts, payments history	N	1 YEAR
			N	1 YEAR

	6 years from date of enrolment	Salesforce customer information	N	
	90 days	Outlook 365 Default Policy for e-mails		