

## **SOLID PRIVACY POLICY**

This is the Privacy Policy of Solid trading B.V. acting as Solid FX. In this Privacy Policy "we", "our" and "us" will mean Solid Trading B.V. as Solid FX and any or all related entities. In providing financial services in The Netherlands we are bound by the Wet Bescherming Persoonsgegevens (WBP). We handle any information we collect about you in accordance with our Privacy Policy.

We have adopted the Privacy policy in order to preserve the confidentiality of all information you provide to us as we take your Privacy seriously.

Our clients, people and entities applying to use our services or anyone associated with such people and entities and whose Personal Information has been provided to us are referred to in this Privacy Policy as "you".

You have the right to request access to the personal information we hold about you. If you want more information about this Privacy Policy, or if you want to inquire about or update any of your personal information, or if you believe your personal information is inaccurate, incomplete or out-of-date, contact us.

This Privacy Policy forms part of our Terms and Conditions of Use of our Service ("Service").

## **NOT PROVIDING YOUR PERSONAL INFORMATION**

If you do not give us your Personal Information, we may not be able to provide products and services to you.

## **KINDS OF PERSONAL INFORMATION WE COLLECT AND HOLD**

Personal Information is information that can identify you.

The nature of personal information collected and maintained by us generally comprises name, address, date of birth, contact details including landline and mobile telephone numbers and email address, residency status, the name and contact details of your professional advisers or representatives such as your solicitor, accountant, financial planner etc, financial information and details contained in identity documents provided to us such as government identifiers in your passport, drivers licence number.

## **COLLECTING YOUR PERSONAL INFORMATION**

We must obtain and collect personal information from you so we can provide products and services to you, provide information and marketing material to you and satisfy certain legislative and regulatory requirements. We may collect personal information about you when you apply to us for a product or service we offer, open an account or register for access to our services or when you deal with us via telephone, fax, email, other electronic methods, or send us a letter. In order to identify you and comply with legislation. Where you deal with us via an agent or attorney we will also collect the personal information of the agent or attorney when or before we deal with such person(s). We may also receive your

updated personal information from third parties where we are trying to locate you.

For training and compliance purposes we record and randomly monitor telephone calls to our customer service officers. If you request information from us (e.g. by using our website or call centre), we may collect your contact details, including your name, postal and email addresses and your telephone numbers.

## **USING AND DISCLOSING YOUR PERSONAL INFORMATION**

We will only collect, hold, use or disclose personal information we collect as permitted by the WBP. Personal information is collected and held in different ways including within our computerized systems such as computer hard drives, email programs and electronic servers, within our data centre's, physically stored onsite and in external storage facilities.

The personal information collected by us is used for the purposes of assessing an application, establishing, administering, operating and maintaining your client relationship with us.

We may also disclose your personal information to external parties, including but not limited to:

- Any third party or organisation that introduces you to us or other financial institutions linked with your dealings with us
- Any third party or organisation we introduce you to and provide information for the operation and management of your affairs.
- Third parties which are your representatives including your legal advisers, accountants and financial advisers
- Third parties involved in maintaining, reviewing and developing our business systems, procedures and infrastructure including for the purposes of system audit and testing or upgrading our computer system
- Verification of your identity and to detect fraud, money laundering or terrorist financing activities under the Anti-Money Laundering Act
- Taking any action we consider appropriate to meet our compliance obligations
- As required by law
- As authorised by law

We will use our best endeavours to ensure that each of our representatives and the businesses that we deal with adhere to the WBP Principles. If you have any concerns about this, contact us.

## **PROTECTING YOUR PERSONAL INFORMATION**

We take reasonable steps to protect your Personal Information from misuse, loss, unauthorised access, modification and disclosure. These include security of our premises, restricting access to personal information to employees who need to perform their day to day employment tasks, providing employee training in relation to privacy and confidentiality, data encryption technology, firewalls, passwords and identifiers to prevent unauthorised access.

## **ACCESSING YOUR PERSONAL INFORMATION**

You may request access to your Personal Information. Access to your Personal Information is not the same as access to a file that we maintain as part of our business processes, nor does it necessarily include all information that we may have collated in relation to you.

We will normally grant you access to your Personal Information within 30 days of receiving your written request subject to us receiving written evidence of your identity. In some complex cases this may take longer and we will advise you of this.

## **COOKIES**

We may use cookies and other technologies to grant you access to certain parts of our service and to monitor traffic patterns, customise settings to suit your account behaviour, manage advertising and other activities.

Most browsers are initially set to accept cookies. If you would prefer, you can set your browser to notify you when you receive a cookie and this will provide you with an opportunity to either accept or reject it each time. If you refuse cookies you may not be able to take full advantage of our service.

## **CHANGES TO PRIVACY POLICY**

We may change this Privacy Policy from time to time for any reason. If we do, we will publish an updated Privacy Policy on our website.

## **PRIVACY COMPLAINTS**

If you believe your Personal Information is not properly protected, or there has been a breach or potential breach of this Privacy Policy or the WBP, please contact us as per the details below and request that your complaint be directed to the Privacy Officer.

We will use our best endeavours to resolve any complaint to your satisfaction. However, if you are unhappy with our response, you can contact the Autoriteit Persoonsgegevens by visiting their website at [www.autoriteitpersoonsgegevens.nl](http://www.autoriteitpersoonsgegevens.nl) .

## **CONTACT DETAILS**

If you would like further information regarding this policy, please contact us.

