



Privacy Policy

*Multi Asset Solutions Limited a company registered
in England and Wales with company number
12590608. Our registered address is 131 Finsbury
Pavement, London EC2A 1NT*

Introduction

Multi Asset Solutions Limited (trading as MAS Markets) ("MAS") is committed to protecting your privacy. This Privacy Policy explains how we collect and use your personal data and which rights and options you have in this respect. Your use of our website constitutes acceptance of this Policy. Any information we hold will be governed by our most recent Privacy Policy.

Data protection law says that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about; and
- Kept securely

This Policy set out how we comply with those requirements.

Who is responsible for your personal data?

MAS is responsible for your personal data. **Multi Asset Solutions Limited** is a private limited company registered in England and Wales with company number 12590608 and with its registered office at 131 Finsbury Pavement, London EC2A 1NT, United Kingdom. It is authorised and regulated by the Financial Conduct Authority (FCA) with Firm Registration Number 926482.

MAS is the data controller for your trading activity and ancillary activities in relation to your trading account(s) held with us as your broker. The data controller is responsible for deciding how your information is used and ensuring it is private and secure.

Which types personal data do we collect?

MAS needs to collect and protect certain personal information to be able to offer its range of financial products and services to its customers.

The personal data we collect may include:

- Identity Data- Personal information such as
 - Name, address and contact details including but not limited to phone number and email address;
 - Date of birth;

- Gender;
- Professional and employment details;
- Passport and/or ID number;
- National insurance/tax identification number;
- information about your income and wealth including details about your assets and liabilities, account balances, tax and financial statements;
- trading history and performance for you or your firm: this includes:
 - products you trade and their performance;
 - products we trade on your behalf and their performance;
 - historical data about the trades and investments you made including the amount invested;
 - your preference for certain types of services and products;
 - any other similar information;
- Contact Data- Contact information, such as your name, job title, postal address, including your home address, where you have provided this to us, business address, telephone number, mobile phone number, fax number and email address;
- Payment & Financial Data- Data necessary for processing payments and fraud prevention, including Corporate and personal credit/debit card numbers, security code numbers and other related billing information;
- Transaction Data- Further business information necessarily processed in a project or client contractual relationship with MAS or voluntarily provided by you, such as instructions given, payments made, requests and projects;
- Profile Data- Your password for the MAS website or other password protected platforms or services, where you have one;
- Third party shared Data- Information collected from publicly available resources, integrity data bases and credit agencies;
- Specialised personal data- In connection with the registration for and provision of access to an event or seminar, we may ask for information about your health for the purpose of identifying and being considerate of any disabilities or special dietary requirements you may have. Any use of such information is based on your consent. If you do not provide any such information about disabilities or special dietary requirements, we will not be able to take any respective precautions; and/or
- Visit Data - Details of your visits to our premises.
- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, cookies, browser plug-in types and versions and actions, operating system and platform, device ID and other technology on the devices you use to access this website.

This website is not intended for children, and we do not knowingly collect data relating to children.

How do we collect your personal data?

We will collect and maintain most personal information from your use of our website. This may be through the use of the application and other types of forms and through active use of any trading account. We use third party applications including leadinfo, lucky orange and adroll.

We may collect personal data about you in a number of other circumstances, including

- Directly from you and your interactions with us;
- From a third party acting on your behalf e.g. an intermediary or another broker;
- From publicly available sources;
- From a third party contracted with us to source information about you from publicly available sources in order to allow us to comply with laws and/or regulations as applied or required by regulatory authorities;
- When we generate it ourselves (e.g. Customer Due Diligence) and/or from other organisations
- When you or your organisation contract with us and/or use any on-line services;
- When you or your organisation browse, make an enquiry or otherwise interact on our website;
- When you attend a seminar or another MAS event or sign up to receive personal data from us, including training; or
- When you or your organisation offer to provide or provide services to us.

In some circumstances, we collect personal data about you from a third-party source. For example, we may collect personal data from your organisation, other organisations with whom you have dealings, government agencies, a credit reporting agency and an information or service provider or from a publicly available record.

For which purposes will we use your personal data?

We may use your personal data for the following purposes only ("**Permitted Purposes**"):

- For the purpose of opening and maintaining a trading account;
- Confirming your identity and address;
- Managing your profile and trading account;
- Providing on-line services or solutions as instructed or requested by you or your organisation and otherwise carrying out your instructions;
- To enable us to provide you with the products and services that you have requested from us and, unless you advise us to the contrary, we will also communicate with you about relevant information and opportunities relating to existing and new products and services which we consider suitable for you;
- We may from time to time use personal information about you to form profiles about you so that we understand your needs and provide the very best products and services we can;
- To assist us in recovering any losses arising out of a breach of our terms and conditions;

- To analyse and improve our services and communications to you;
- Managing and administering your or your organisation's business relationship with MAS, including processing payments, accounting, auditing, billing and collection, support services;
- Compliance with our legal obligations (such as record keeping obligations), compliance screening or recording obligations (e.g. under antitrust laws, export laws, trade sanction and embargo laws, for anti-money laundering, financial and credit check and fraud and crime prevention and detection purposes), which may include automated checks of your contact data or other information you provide about your identity against applicable sanctioned-party lists and contacting you to confirm your identity in case of a potential match or recording interaction with you which may be relevant for compliance purposes;
- Protecting the security of and managing access to our premises, IT and communication systems, online platforms, websites and other systems, preventing and detecting security threats, fraud or other criminal or malicious activities;
- For insurance purposes;
- For monitoring and assessing compliance with our policies and standards;
- To identify persons authorised to contract or trade on behalf of our clients, customers, suppliers and/or service providers;
- To comply with our legal and regulatory obligations and requests anywhere in the world, including reporting to and/or being audited by national and international regulatory bodies;
- To comply with court orders and exercises and/or defend our legal rights; and
- For any purpose related and/or ancillary to any of the above or any other purpose for which your personal data was provided to us.

Where you have expressly given us your consent, we may process your personal data also for the following purposes:

- Communicating with you through the channels you have approved to keep you up to date on the latest legal developments, announcements, and other information about MAS services, products and technologies (including client briefings, newsletters and other information) as well as MAS events and projects;
- Customer surveys, marketing campaigns, market analysis or other promotional activities or events; or
- Collecting information about your preferences to create a user profile to personalise and foster the quality of our communication and interaction with you (for example, by way of newsletter tracking or website analytics).

In addition, we may share your personal information with cooperation partners who provide services on our behalf or your behalf or who have introduced you to us. It is in our legitimate interest to use your personal information in such way to provide you with our services.

We do use third party service providers to send out our marketing, but we only allow them to use that information on our instructions and where they have agreed to treat the information confidentially and to keep it secure. It is in our legitimate interest to use your personal information in such way.

With regard to marketing-related communication, we will - where legally required - only provide you with such information after you have opted in and provide you the opportunity to opt out anytime if you do not want to receive further marketing-related communication from us. We will not use your personal data for taking any automated decisions affecting you or creating profiles other than described above.

Depending on for which of the above Permitted Purposes we use your personal data, we may process your personal data on one or more of the following legal grounds:

- Because processing is necessary for the performance of a client instruction or other contract with you or your organisation;
- To comply with our legal obligations (e.g. to keep records for tax purposes); or
- Because processing is necessary for purposes of our legitimate interest or those of any third-party recipients that receive your personal data, provided that such interests are not overridden by your interests or fundamental rights and freedoms.

In addition, the processing may be based on your consent where you have expressly given that to us.

Website information

Our web pages and e-mails may contain cookies, web beacons or pixel tags or any other similar type of data analysis tools which allow us to track receipt of correspondence and to count the number of users that have visited our webpage or opened our correspondence. Where your personal information is completely anonymised, we do not require a legal basis as the information will no longer constitute personal information. However, where your personal information is not in an anonymised form, it is in our legitimate interest to continually evaluate that personal information to ensure that the products and services we provide are relevant to the market.

With whom will we share your personal data?

We may share your personal data in the following circumstances:

- We may also instruct service providers within or outside of MAS, domestically or abroad, e.g. third parties who provide services to us such as regulatory reporting, liquidity providers, payment providers, shared service centres who need access to or to process personal data for the Permitted Purposes on our behalf and in accordance with our instructions only. MAS will retain control over and will remain fully responsible for your personal data and will use appropriate safeguards as

required by applicable law to ensure the integrity and security of your personal data when engaging such service providers;

- We may share your personal data with companies providing services for money laundering checks, credit risk reduction and other fraud and crime prevention purposes and companies providing similar services, including financial institutions, credit reference agencies and regulatory bodies with whom such personal data is shared;
- We may share your personal data with any third party to whom we assign or novate any of our rights or obligations;
- We may share your personal data with courts, law enforcement authorities, regulators or attorneys or other parties where it is reasonably necessary for the establishment, exercise or defence of a legal or equitable claim, or for the purposes of a confidential alternative dispute resolution process;
- We may also use aggregated personal data and statistics for the purpose of monitoring website usage in order to help us develop our website and our services.

Otherwise, we will only disclose your personal data when you direct us or give us permission, when we are required by applicable law or regulations or judicial or official request to do so, or as required to investigate actual or suspected fraudulent or criminal activities.

Personal data about other people which you provide to us

If you provide personal data to us about someone else (such as one of your directors or employees, or someone with whom you have business dealings) you must ensure that you are entitled to disclose that personal data to us and that, without our taking any further steps, we may collect, use and disclose that personal data as described in this Privacy Policy. In particular, you must ensure the individual concerned is aware of the various matters detailed in this Privacy Policy, as those matters relate to that individual, including our identity, how to contact us, our purposes of collection, our personal data disclosure practices (including disclosure to overseas recipients), the individual's right to obtain access to the personal data and make complaints about the handling of the personal data, and the consequences if the personal data is not provided (such as our inability to provide services).

Keeping personal data about you secure

We have put in place appropriate technical and organisational security measures to keep personal data confidential and secure as well as preventing your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Transferring your personal data abroad

The Personal Data that we collect maybe stored and processed in the European Economic Area ("EEA") or transferred to, stored at or otherwise processed outside the EEA.

Where Personal Data is transferred outside the EEA we will take all steps reasonably necessary to ensure that the Data is kept secure and treated in accordance with this Data Protection Notice and the requirements of applicable law wherever the data is located. Appropriate transfer agreements and mechanisms (such as the EU Model Clauses) will be put in place to help ensure that our third-party service providers provide an adequate level of protection for Personal Data.

Third Party Websites

Our website or app may have links to external third-party websites. Please note that third party websites are not covered by this privacy notice and those websites are not subject to MAS's privacy standards and procedures. Please check with each third party regarding their privacy standards and procedures.

Updating personal data about you

If any of the personal data that you have provided to us changes, for example if you change your email address or if you wish to cancel any request you have made of us, or if you become aware we have any inaccurate personal data about you, please let us know by sending an email to support@MAS-markets.com. We will not be responsible for any losses arising from any inaccurate, inauthentic, deficient, or incomplete Personal Data that you provide to us.

For how long do we retain your personal data?

Your personal data will be deleted when it is no longer reasonably required for the Permitted Purposes, or you withdraw your consent (where applicable) and we are not legally required or otherwise permitted to continue storing such data. We will, in particular, retain your personal data where required for MAS to assert or defend against legal claims until the end of the relevant retention period or until the claims in question have been settled. We will also retain it where we may need it for our legitimate purposes e.g. to help the firm respond to queries or complaints or for other reasons e.g., fraud and financial crime and responding to requests from regulators.

Your rights

You have a number of rights under data protection laws in relation to your personal data.

You have the right to:

- Request access to your personal data (commonly known as a "subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data in certain circumstances. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data (including carrying out profiling based on our legitimate interests). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.
- You also have the absolute right to object any time to the processing of your personal data for direct marketing purposes.
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in one of the following scenarios:
 - If you want us to establish the data's accuracy;
 - Where our use of the data is unlawful, but you do not want us to erase it;
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or

- You have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.

If you wish to exercise any of the rights set out above, please contact us see Contact details below.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

1. Contact details

If you have any questions about this privacy policy or about the use of your personal data or you want to exercise your privacy rights, please contact us in the following ways:

- Email address: support@MAS-markets.com
- Send a letter to our Data Manager, Chris James at Multi Asset Solutions Limited, 131 Finsbury Pavement, London, EC2A 1NT, United Kingdom.

2. Complaints

You have the right to make a complaint to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). However, before doing so please make sure you have first made your complaint to us or asked us for clarification if there is something you do not understand. We will consider any requests or complaints which we receive and provide you with a response in a timely manner.

3. Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. This version was last updated in June 2023. Historic versions can be obtained by contacting us. We reserve the right to update and change this Privacy Policy from time to time in order to reflect any changes to the way in which we process your personal data or changing legal requirements. In case of any such changes, we

will post the changed Privacy Policy on our website or publish it otherwise. The changes will take effect as soon as they are posted on this website.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us, for example a new address or email address.

4. Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.