



Privacy Policy

December 2023

Privacy policy

1. ThinkMarkets, including all subsidiaries, Affiliates and associated companies, (ThinkMarkets, it, we, us or our) :ThinkMarkets promises to treat all your personal information carefully and responsibly.
2. Personal information includes any information that lets ThinkMarkets identify you as a unique individual, such as your name/s and surname combined with your physical address, contact details and/or passport/identity number.
3. Personal information also refers to the personal information that uniquely identifies a legal entity, such as the trading name of a company combined with the company registration number.
4. Special personal information includes that which details your race or ethnic origin, religious and philosophical beliefs, political persuasion, trade union membership, health or sex life, biometric information or any criminal behaviour which relates to alleged criminal offences or proceedings.
5. Personal information may be given to or collected by ThinkMarkets in writing as part of a written or online application form, electronically (email), telephonically, online (ThinkMarkets or ThinkTrader) or via the ThinkMarkets trading App.
6. Processing of personal information includes any initial processing that ThinkMarkets does when we first collect your personal information. It also includes any further and ongoing processing that ThinkMarkets is allowed to carry out legitimately in terms of the reasons listed below. The term 'processing' includes collecting, using, altering, merging, linking, organising, disseminating, storing, retrieving, disclosing, erasing, archiving, destroying or disposing of personal information. This may include processing required to confirm your identity, to process transactions, to manage your account, to comply with record keeping regulations, to identify, prevent and investigate any fraudulent or illegal activity or any other requirements of a competent authority.
7. ThinkMarkets are obligated to comply with AML Regulations among other laws & regulations, and are required to keep certain documentation to ensure we remain compliant. This may be made available to relevant authorities on their request for legal purposes only. Please note that ThinkMarkets will only collect and process your personal information for the reason you provided it to us, or to enable us to comply with the requirements of specific laws that we are governed by.
8. ThinkMarkets may process your personal information to protect your or our legitimate interests.
9. ThinkMarkets will not collect and process personal information about you that we do not need for this purpose.
10. Furthermore, ThinkMarkets will not process your special personal information unless:
 - 11.1 You have consented to ThinkMarkets processing it;
 - 11.2 It is necessary to exercise or defend a right or obligation in law;
 - 11.3 It is necessary to comply with an international legal obligation of public interest;
12. It is for certain historical, research or statistical purposes that would not adversely affect your privacy; or
13. You have deliberately made your information public.
14. There are some personal information fields that you have to fill in if you want

ThinkMarkets to provide you with your chosen product and/or service. This information can be provided in writing, electronically or telephonically, but it must be accurate and complete. If ThinkMarkets does not receive the necessary personal information, we may not be able to continue with your application. If you are already a(n) customer and ThinkMarkets asks you for this information and you do not provide it, ThinkMarkets may suspend the provision of the product and/or services for a period of time, or as the case may be, even terminate our relationship with you.

15. In most cases, personal information will be collected directly from you, but there may be other instances when ThinkMarkets will collect personal information from other sources.

These may include public records, places where you may already have made your personal information public (for example, on social media), credit bureaus, or individuals/directors whom you have appointed as your representative, where you are a corporate entity. ThinkMarkets will only collect your personal information from other sources where we are legally entitled or obliged to do so, and you are entitled to ask ThinkMarkets which sources they used to collect your personal information.

16. For the purposes outlined above, ThinkMarkets will, in most instances, collect and process your personal information internally. However, there are times when

ThinkMarkets needs to outsource these functions to third parties, either within

ThinkMarkets Group or external to ThinkMarkets, including parties in other countries. Where your personal information is shared internally within ThinkMarkets, such sharing will be carried out only for the purposes outlined above.

17. ThinkMarkets reserves the right to change this Agreement at any time. All changes to this Agreement will be posted on the website. Unless otherwise stated, the current version shall supersede and replace all previous versions of this Agreement.

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