

## PRIVACY POLICY

London Cape Equities Group Ltd rigorously protects the privacy of our users and we aim to provide a safe and secure user experience. We place great emphasis on ensuring that the information you submit to us remains private, and is only used for the purposes set out in this policy.

### Information Collection and Use

London Cape Equities Group Ltd ("LCE") needs to collect certain personal information to meet its legal obligations and the needs of our clients. The type of information may include but not be restricted to name, address, date of birth, contact details, income, assets and liabilities, account balances, trading statements, tax and financial statements and employment details. Most of this information will be obtained directly from our clients when an application form is completed and from maintaining records in the course of our business relationship with the client. LCE may also ask for additional information from time to time to help to improve our client service.

Unless advised otherwise, LCE will use the personal information for establishing and managing your account, enhancing customer service and products, as well as giving you on-going information or opportunities that may be relevant to your requirements.

Please be aware that personal information may be disclosed to:

- a. credit providers, courts and tribunals and regulatory authorities as agreed or authorised by law
- b. credit reporting or reference agencies

We do however require organisations outside of the group which handle or obtain personal information as a service provider to acknowledge the confidentiality of the information and undertake to respect our client's right to privacy and comply with the Data Protection Principles of this policy.

London Cape Equities Group Ltd is the sole owner of the information collected on this site. We will not sell, share, or rent this information to others in ways different from that which is disclosed in this statement. This Web site does not collect personally identifying information about you except when you specifically and knowingly provide it.

### Use of Cookies

A cookie is a small data file which is sent from a web server to a web browser when that browser visits the server's site. They will not track your other Internet activity and our cookies do not gather personally identifiable information. Cookies are commonly used by websites to improve the user experience and have not been known to transmit computer viruses or otherwise harm your computer. None will contain information that will enable anyone to contact you via telephone, e-mail, or any other means. You can set up your Web browser to inform you when cookies are set or to prevent cookies from being set, for example, in Microsoft Internet Explorer, from the menu select Tools, Internet Options and Privacy. We reserve the right to use other tracking technologies in the future, but if we do so we will amend our policy to explain their use. For full details please see our Cookie policy.

### Uploaded Files

All files are uploaded and held on a London Cape Equities Group Ltd server and held in a secure folder for London Cape Equities Group Ltd to retrieve.

### Links to third party websites

The Privacy Statement only applies to London Cape Equities website. Please note that clicking on to links and banner advertisements may result in your transferral to another website, where data privacy practices may be different to that of London Cape Equities Group Ltd. Visitors should consult the other websites' privacy policies as we are not responsible for, and have no control over, information that is submitted to or collected by these third parties.

### **The Data Protection Act 1998**

The information given to us, including uploaded files and e-mail addresses, is termed "personal data" under the Data Protection Act 1998. We must therefore follow the principles set out in that Act when we process personal data. All the personal data that we obtain is held on our central in-house database. London Cape Equities Group Ltd is the "data controller" for the purposes of the Data Protection Act.

### **Security**

This website takes every precaution to protect our users' information. When users submit sensitive information via the website, your information is protected both online and off-line. Our Web site is protected by SSL, whereby all information our users submit is encrypted and is protected with 128bit encryption software. While on a secure page, the lock icon on the bottom of Web browsers such as Microsoft Internet Explorer becomes locked, as opposed to un-locked, or open, when one is just 'surfing'. While we use SSL encryption to protect sensitive information online, we also do everything in our power to protect user-information off-line. All of our users' information is restricted in our offices. Only employees who need the information to perform a specific job (for example, our billing clerk or a customer service representative) are granted access to personally identifiable information. Furthermore, all employees are kept up-to-date on our security and privacy practices. Every quarter, as well as any time new policies are added, our employees are notified and/or reminded about the importance we place on privacy and the protection of our customers information. Finally, the London Cape Equities servers that we store personally identifiable information on are kept in a secure environment, behind a locked cage and only accessible by authorised personnel.

### **Changes to our Privacy Policy**

This privacy policy may be changed by London Cape Equities Group Ltd at any time. If we change our privacy policy in the future, we will set out those changes here, so that you will always know what personal information we gather, the purposes we might use it for and to whom we might disclose it. If at any time, there are questions or concerns about our online privacy statement, please feel free to contact us.

### **Website Disclaimer**

Whilst London Cape Equities Group Ltd uses reasonable care in compiling and presenting the information found on this web site, it is provided purely for information and you should seek further guidance and make independent inquiries before relying upon it. The information included in this website has been compiled from a variety of sources and is subject to change without notice. London Cape Equities Group Ltd makes no representation or warranty whatsoever regarding the completeness, accuracy, currency, adequacy, suitability or operation of this website, or of the information it contains nor makes any such warranty in respect of any information carried on any website operated by a third party which may be accessed from this website, nor that the information on this or any third party website has in any way been verified by London Cape Equities Group Ltd. All information contained on this website is provided on an "as is" basis London Cape Equities Group Ltd assumes no responsibility for information contained in this site and disclaims all liability arising from negligence or otherwise in respect of such information. By using this web site you assume the risk that the information on this web site may be incomplete, inaccurate, out of date or may not meet your requirements. This web site was created in England. Any interpretation of its content, claims or disputes (of whatever nature and not limited to contractual issues) shall be subject to the exclusive jurisdiction of the English Courts under English law.

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