

## **GDPR PRIVACY NOTICE**

Welcome to JonesTrading International Limited's privacy notice.

JonesTrading International Limited respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) or subscribe to our materials and publications or purchase our services and tell you about your privacy rights and how the law protects you.

### **1. IMPORTANT INFORMATION AND WHO WE ARE**

#### **PURPOSE OF THIS PRIVACY NOTICE**

This privacy notice aims to give you information on how JonesTrading International Limited collects and processes your personal data through your use of this website. This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

#### **CONTROLLER**

JonesTrading International Limited is the controller and responsible for your personal data (collectively referred to as "JTIL", "we", "us" or "our" in this privacy notice).

JTIL is part of a group of different legal entities, JonesTrading Institutional Services LLC(USA) and JonesTrading Canada Inc. (Canada).This privacy notice is issued on behalf of the JonesTrading Group so when we mention "JTIL", "we", "us" or "our" in this privacy notice, we are referring to the relevant company in the JonesTrading Group responsible for processing your data. We will let you know which entity will be the controller for your data when you purchase a product or service with us. JonesTrading Group is the controller and responsible for this website.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

#### **CONTACT DETAILS**

Full name of legal entity: JonesTrading International Limited

Name or title of data privacy manager: Darren Yarlett

Email address: [dyarlett@jonestrading.com](mailto:dyarlett@jonestrading.com)

JonesTrading International Limited  
Building 1, Chalfont Park, Gerrards Cross, SL9 0BG  
United Kingdom 1.877.566.3785 +44 (0) 207.113.6200 [www.jonestrading.com](http://www.jonestrading.com)  
JonesTrading International Limited is a company incorporated in England and Wales  
with company number 04274625.  
We are authorised and regulated by the Financial Conduct Authority ("FCA") with FCA  
registration number 208165

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## **CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES**

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.

Any changes to this privacy policy will be posted on this site and where appropriate notified to you in writing.

## **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 notice of every website you visit.

## **2. THE DATA WE COLLECT ABOUT YOU**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- Contact Data includes billing address, delivery address, email address and telephone numbers.
- Financial Data includes bank account and payment card details.
- Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.
- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- Profile Data includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- Usage Data includes information about how you use our website, products and services.

- Marketing and Communications Data includes correspondence with us and your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

### **IF YOU FAIL TO PROVIDE PERSONAL DATA**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

### **3. HOW IS YOUR PERSONAL DATA COLLECTED?**

We use different methods to collect data from and about you including through:

- 3.1 Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - 3.1.1 apply for our products or services;
  - 3.1.2 subscribe to our service or publications;
  - 3.1.3 request marketing to be sent to you; or
  - 3.1.4 give us some feedback.
- 3.2 Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy herein for further details.

### **4. HOW WE USE YOUR PERSONAL DATA**

- 4.1 We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- 4.1.1 Where we need to perform the contract we are about to enter into or have entered into with you.
- 4.1.2 Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- 4.1.3 Where we need to comply with a legal or regulatory obligation.
- 4.2 Generally we do not rely on consent as a legal basis for processing your personal data but where we do, you have the right to withdraw consent at any time by Contacting us.

#### PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

- 4.3 We have set out below, in a table format, a description of all the ways we may use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.
- 4.4 Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please Contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

| <b>Purpose/Activity</b>  | <b>Type of data</b>   | <b>Lawful basis for processing including basis of legitimate interest</b>   |
|--|---|---|
| <i>To register you as a new customer</i>   | (a) Identity<br>(b) Contact   | <i>Performance of a contract with you</i>   |
| <i>To process and deliver your order including:</i><br>(a) <i>Manage payments, fees and charges</i><br>(b) <i>Collect and recover money owed to us</i> | (a) Identity<br>(b) Contact<br>(c) Financial<br>(d) Transaction<br>(e) Marketing and Communications | (a) <i>Performance of a contract with you</i><br>(b) <i>Necessary for our legitimate interests (to recover debts due to us)</i> |
| <i>To manage our relationship with you which will include:</i><br>(a) <i>Notifying you about changes to our terms or privacy policy</i>                | (a) Identity<br>(b) Contact<br>(c) Profile  | (a) <i>Performance of a contract with you</i><br>(b) <i>Necessary to comply with a legal obligation</i>                         |

|  |  |  |
|--|--|--|
| <i>(b) Asking you to leave a review or take a survey</i>   | <i>(d) Marketing and Communications</i>  | <i>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</i>   |
| <i>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</i> | <i>(a) Identity<br/>(b) Contact<br/>(c) Technical</i>  | <i>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)<br/><br/>(b) Necessary to comply with a legal obligation</i> |
| <i>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</i>                            | <i>(a) Identity<br/>(b) Contact<br/>(c) Profile<br/>(d) Usage<br/>(e) Marketing and Communications<br/>(f) Technical</i> | <i>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</i>   |
| <i>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</i>  | <i>(a) Technical<br/>(b) Usage</i>   | <i>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</i>   |
| <i>To make suggestions and recommendations to you about goods or services that may be of interest to you</i>   | <i>(a) Identity<br/>(b) Contact<br/>(c) Technical<br/>(d) Usage<br/>(e) Profile</i>                                      | <i>Necessary for our legitimate interests (to develop our products/services and grow our business)</i>   |

## COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy herein.

## **CHANGE OF PURPOSE**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please Contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **5. DISCLOSURES OF YOUR PERSONAL DATA**

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal Third Parties who will be members of the JonesTrading Group.
- External Third Parties including (a) professional advisers such as law firms and accountancy firms; (b) other service providers of JTIL or its administrator, including technology service providers; (c) courts and regulatory, tax and governmental authorities; or (d) third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

Some of these persons will process your personal data in accordance with our instructions and others will themselves be responsible for their use of your personal data. These persons may be permitted to further disclose the personal data to other parties. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **6. INTERNATIONAL TRANSFERS**

Some of our external third parties are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

JonesTrading International Limited  
Building 1, Chalfont Park, Gerrards Cross, SL9 0BG  
United Kingdom 1.877.566.3785 +44 (0) 207.113.6200 [www.jonestrading.com](http://www.jonestrading.com)  
JonesTrading International Limited is a company incorporated in England and Wales  
with company number 04274625.  
We are authorised and regulated by the Financial Conduct Authority ("FCA") with FCA  
registration number 208165

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

## 7. DATA SECURITY

We have put in place appropriate security measures to prevent 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.

## 8. DATA RETENTION

### HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

JTIL retention periods are governed by law or regulation for different aspects of your personal data. JTIL will follow the retention period required by these laws or regulations and may include retention periods to which JonesTrading Group is subject. By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see below for further information.

## 9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data which are:

You have the right to:

Request **access** to your personal data (commonly known as a “data 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. 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) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request **restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) 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 (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

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.

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



## **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 may 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 may 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.

## GDPR COOKIE POLICY

### INFORMATION ABOUT OUR USE OF COOKIES

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. By continuing to browse the site, you are agreeing to our use of cookies.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our website. Analytical/performance cookies. They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

You can find more information about the types of individual cookies we use and the purposes for which we use them in the table below:

| Cookie | Name | Purpose | More information |
|--------|------|---------|------------------|
|--------|------|---------|------------------|

| COOKIE TITLE     | COOKIE NAME  |   |
|------------------|--------------|---|
| Google Analytics | ga, gat, gid | <p>Examples of purposes for which a cookie may be used:</p> <p>This cookie enables us to:</p> <p>Estimate our audience size and usage pattern.</p> <p>Store information about your preferences, and so allow us to customise our site and to provide you with offers that are targeted at your individual interests.</p> <p>Speed up your searches.</p> <p>Recognise you when you return to our site.</p> <p>Allow you to use our site in a way that makes your browsing experience more convenient, for example, by allowing you to store items in an electronic shopping basket between visits. If you register with us or complete our online forms, we will use cookies to remember your details during your current visit, and any future visits provided the cookie was not deleted in the interim.</p> |

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.