

# **Avtrade Privacy Policy**

# AVTCMDOC11

AVTRADE LIMITED is a private company incorporated in England and Wales under company number 1917328 with its registered office at and its usual place of business at Global Headquarters, Sayers Common, West Sussex BN6 9JQ, England

AVTRADE LEASING LIMITED is a private company incorporated in England and Wales under company number 3578090 with its registered office at and its usual place of business at Global Headquarters, Sayers Common, West Sussex BN6 9JQ, England

Avtrade Limited and Avtrade Leasing Limited are wholly owned by Avtrade Holdings Limited, a company incorporated in England and Wales under company number 04180145 with its registered office at and its usual place of business at Global Headquarters, Sayers Common, West Sussex BN6 9JQ, England

Avtrade Limited and Avtrade Leasing Limited are for the purposes of this Privacy Policy collectively known as "Avtrade" or "We".

Avtrade is fully committed to protecting and respecting the privacy of all personal data received or collected in strict adherence to the EU General Data Protection Regulation.

### **INTRODUCTION**

This Privacy Policy sets out how we use and protect any information that Avtrade uses about you (including information provided through the website <a href="www.avtrade.com">www.avtrade.com</a>). In providing services to our global customer base we may collect the personal data of our contacts and customers.

#### WHAT DATA WE COLLECT

Avtrade may collect, use, store and transfer personal data about you. This personal data will include:

- Identity data such as your name and title;
- Contact details such as your position, company name, email address, billing and physical addresses and telephone numbers;
- Personal data such as education, work history and other personal data typically found on a CV;
- Financial data such as bank details and account information;
- Customer data such as transaction history and contractual documentation;
- Usage data such as how you use Avtrade's on line systems such as the website and Avnet, including your IP address;
- Visit and event data such as details of your visits to our site and dietary requirements.

#### WHERE YOUR DATA IS STORED

The data collected from you by Avtrade is securely stored in accordance with industry standard practice. It may be transferred to or stored and processed at a location outside the European Economic Area.



# **Avtrade Privacy Policy**

# AVTCMDOC11

By submitting your personal data, you agree to this transfer, storage or processing. Avtrade will take all steps reasonably necessary to ensure your data is treated securely and in accordance with this Privacy Policy.

Where you provide Avtrade with information it is your responsibility to ensure that it is complete and accurate and not misleading.

### HOW WE USE YOUR DATA

Avtrade uses your personal data:

- To provide goods and services to you;
- To make available to you and maintain a tailored website;
- To manage your account;
- To verity your identity;
- For market research purposes.

#### WHO YOUR DATA IS SHARED WITH

Avtrade may share personal data collected from you as follows:

- With third parties utilised by Avtrade in order for us to carry out our services such as records inspection, translation services, paralegal services, sales representatives;
- With Avtrade's insurers and auditors;
- With lawyers and legal professionals;
- With event and hospitality providers;
- With third parties in the event We sell, transfer or merge part of our business or assets, or if We seek to buy any business or assets;
- Where we are under a duty to disclose or share your personal data in order to comply with any legal obligation.

#### **COOKIES**

Avtrade uses cookies on our website, mobile app and emails. Cookies are small, often encrypted text files, located in browser directories. They enable you to navigate on our website or app and allow us to provide features to recognise your computer so you don't have to give the same information several times and to measure how many people use our services, so We can make them easier to use and ensure adequate usage speeds.

For more information on cookies please visit www.allaboutcookies.org



# **Avtrade Privacy Policy**

## AVTCMDOC11

#### The cookies we collect are:

COOKIES		Stored on user's device	
NAME	DESCRIPTION		
HasAcceptedCookies	Specifies that the user has accepted the use of Cookies from our website. If this cookie is absent then the user has not consented and processing cannot take place.		
_gat, _ga, _gid	Used by Google Analytics to website	Used by Google Analytics to track visitor behaviour on this website	

#### PERSONAL DATA SECURITY AND RETENTION

Avtrade has in place appropriate measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way.

Access to your personal data is limited to those employees, consultants, representatives or third parties who have legitimate reason to access the data. They will only access and process the data strictly in accordance with Avtrade's instructions and will be bound by strict confidentiality.

Where you have chosen a password which enables you to use an Avtrade site, you are responsible for keeping this password confidential.

We will keep your personal data for as long as is necessary to fulfil the purposes for which it was collected or as we are required by legislation or industry standard. These periods are subject to change.

### YOUR RIGHTS

You have certain rights in relation to Avtrade's storage of your personal data as follows:

- The right to request access to your personal data;
- The right to request correction to your personal data;
- The right to request erasure of your personal data;
- The right to object to the processing of your personal data;
- The right to request restriction of the processing of your personal data;
- The right to transfer your personal data;
- The right to withdraw consent.

## CHANGES TO THE PRIVACY POLICY

Our Privacy Policy may be updated from time to time. This version of the Privacy Policy is dated 1 May 2018.

#### **CONTACT**

For any questions, comments or further information, please contact data.protection@avtrade.com