

Data Privacy Notice

1. Introduction

We value Your privacy and take utmost care to protect it. We collect Your personal data to provide You with a range of Our financial services and to inform You about these services.

The purpose of this privacy notice is to show You how Your personal data is processed, for what purposes Your data is processed and what rights You have in relation to the personal data that will be collected and used. Personal data is at all times processed in order for Lunaro Financial Services Limited ('Lunaro') to fulfil its legal obligations.

Any reference to 'Us', 'Our', 'We' or 'Lunaro' in this privacy notice is a reference to Lunaro Financial Services Limited as the context requires unless otherwise stated. Similarly, any reference to 'You', 'Your', 'Yours' or 'Yourself' in this privacy notice is a reference to any of Our customers and potential customers as the context requires unless otherwise stated.

2. Who is collecting Your data?

This privacy notice applies to the processing activities of Lunaro. The details of Lunaro are as follows:

Lunaro Financial Services Limited: a company registered in England and Wales under register number 03148972. The registered address of the company is 16 Great Queen Street, Covent Garden, London, United Kingdom, WC2B 5AH. It is registered with the UK Information Commissioner under registration number Z1457804.

Lunaro provides execution only and social trading services to retail and professional clients for Spread Betting ('SB') and Contract for Difference ('CFD') products.

You can contact Us in writing about how We use Your personal data by writing to the following address:

Data Protection Officer
Lunaro Financial Services Limited
8 Albemarle Way
London,
EC1V 4JB

Or alternatively by emailing the Data Protection Officer at dpo-lon@lunaro.com

3. What data is being collected?

We may collect the following types of personal data from You:

- Personal information such as gender, name, date of birth and address
- Contact information (email address and phone number)
- Employment information, financial information, relevant education and trading experience
- Citizenship and social security numbers or national identity and passport numbers
- Proof of photo ID and/or address
- Unique technology device number (ip address) and other information including the version and type of web browser You use
- Financial sanctions and credit header information
- Location data
- Trading performance
- Telephone or electronic communication
- Any other similar information

4. What is the legal basis and the purpose of processing the data?

To deliver Our contracted services (or steps taken on Your request prior to entering into a contract) and to achieve compliance with applicable laws and regulations, We process and share Your personal information for the purposes of providing Our financial services as follows:

- To manage Your account(s)
- To meet Our anti money laundering (“AML”) and other regulatory obligations such as client due diligence, regulatory reporting, preventing financial crime, and deciding if Our product is appropriate or suitable for Your needs
- To send You correspondence in relation to the services provided and to fulfil Our regulatory and compliance obligations
- To perform Our electronic AML screening checks and to comply with other fraud detection policies. This may generate further information on Your credit history, criminal convictions or political interests leading to Us making decisions based on the results of these checks
- To respond to Your enquiries, complaints and issues
- To marketing Our product and services to You
- For internal business purposes and record keeping
- For Evaluating the effectiveness of marketing and for research, training and statistical analysis with the aim of improving the services We provide to You

5. Will the data be shared with any third parties?

We share Your personal data (including copies of Your identification and accompanying documents used for address verification) to enable Us to process data for the purposes outlined above.

We may share Your data with:

- Other group companies of the Lunaro Group
- Affiliates, Introducing Brokers or White Label business partners
- Credit Reference Agencies
- External service providers and professional advisers that provide services to Lunaro
- Financial Regulators
- Law Enforcement Agencies
- Any person authorised by You including Your solicitor, accountant or broker

6. Will the personal information be transferred outside of the EU?

We may transfer Your personal information outside of the European Economic Area where it is necessary to fulfil Our contractual obligations to You or where We are required to achieve compliance with applicable laws and regulations.

In connection with providing You Our services, We may be required to send personal information to countries outside of the EEA to countries which have not been deemed to have adequate standards of data protection. When We do so, We will perform a risk assessment prior to such transfer and will use EEA recognised and enforceable Model Clause contracts so that Your information is protected in line with relevant data protection laws.

7. How long will the data be stored for?

We will retain Your personal data for as long as necessary to meet local legal, regulatory and business requirements. For example, We are subject to certain anti-money laundering laws which require Us to retain Your data for a period of five years after Our business relationship with You has ended. Retention periods may be extended if We are required to preserve personal data in connection with litigation, investigations and/or proceedings.

8. What safeguards are in place to protect Your data?

We have implemented appropriate technical and organisational measures to secure the processing of personal data. These safeguards will vary depending on the sensitivity, format, location, amount, distribution and storage of the personal data, and include measures designed to keep personal data protected from unauthorised access. If appropriate, these safeguards include the encryption of communications via SSL, encryption of information during storage, firewalls, access controls, separation of duties, and similar security protocols.

We restrict access to personal data to personnel and third parties that require access to such information for legitimate, relevant business purposes.

All Our staff members, contractors and third parties who have access to personal data on Our instructions are bound to confidentiality and We use control mechanisms to limit access to individuals that require such data for the performance of their responsibilities and tasks.

We have information security policies in place. Such security policies and systems are frequently audited.

9. What rights do You have as data subject?

You have the following rights with respect to Your personal data:

- The right to access Your personal data
- The right to request that Your personal data is corrected if it is found to be inaccurate
- The right to request that Your personal data is deleted where it is no longer necessary for Us to keep it
- The right to withdraw consent to processing at any time, where relevant
- The right to restrict processing where there is a dispute in relation to the accuracy or processing of the personal data
- The right to request that Lunaro provides You with Your personal data and where possible, transmit that data to another data controller if the processing is based on consent or is necessary for the performance of a contract with You. In either case We will process the data by automated means.
- The right to object to the processing of personal data where processing is based on a legitimate interest.
- The right not to be subject to a decision which is based solely on automated processing, including profiling which produces legal effects concerning You or similarly, significantly affects You.

10. What rights do You have as data subject?

Should You have any questions or complaints about Your privacy please contact Us by writing to Our Data Protection Officer. If a complaint is not resolved by us to Your satisfaction, You may complain to the relevant supervisory authority.

For Lunaro Financial Services Limited clients, the supervisory authority is the Information Commissioner's Office ("ICO"). The contact details of the ICO are as follows:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Tel: +44 (0)303 123 1113

Fax: +44 (0)1625 524 510

Website: www.ico.org.uk