

SECTION A – INTRODUCTION

1. INTRODUCTION

1.1 The information in this document details how we, Business Trading Limited (trading as Pacific Trading), comply with the requirements of the Data Protection Act 1998 (“Data Protection Act”) and the Information Commissioner’s Office (“ICO”) in protecting your personal data.

1.2 Personal data is any information or opinion about you that is capable, or reasonably capable, of identifying you, whether the information or opinion is true or not and is recorded in material form or not.

1.3 Sensitive data includes such things as your racial or ethnic origin, political opinions or membership of political associations, religious or philosophical beliefs, membership of a professional or trade association or trade union, sexual orientation or criminal record, that is also personal data. Your health, genetic and biometric information and biometric templates are also sensitive data.

1.4 We will act to protect your personal data and sensitive data in accordance with the Data Protection Act.

1.5 We collect personal and/or sensitive data to provide you with the products and services you request as well as information on other products and services offered by or through us.

1.6 Your personal and/or sensitive data may be used by us to administer our products and services, for prudential and risk management purposes and, unless you tell us otherwise, to provide you with related marketing information. We also use the information we hold to help detect and prevent illegal activity. We cooperate with police and other enforcement bodies as required or allowed by law.

1.7 We disclose relevant personal data to external organisations that help us provide services. These organisations are bound by confidentiality arrangements. They may include overseas organisations.

1.8 You can seek access to the personal data we hold about you. If the information we hold about you is inaccurate, incomplete, or outdated, please inform us so that we can correct it. If we deny access to your personal data, we will let you know why. For example, we may give an explanation of a commercially sensitive decision, or give you access to the information through a mutually agreed intermediary, rather than direct access to evaluative information connected with it.

SECTION B – COLLECTION OF PERSONAL DATA

2. Why we collect data

2.1 We collect personal data when it is reasonably necessary for one or more of our functions or activities.

2.2 These include:

- (a) administering our client relationships;
- (b) providing clients with the products and services they request and, unless they tell us otherwise, to provide information on products and services offered by us and external product and service providers for whom we act as agent. (If you have provided us with your email or mobile phone details, we may provide information to you electronically with respect to those products and services);
- (c) complying with our legal obligations;
- (d) monitoring, evaluating and customising products and services and improving client experience;
- (e) assisting clients with queries; and
- (f) taking measures to detect and prevent fraudulent crime or any other activity which may cause harm to Pepperstone's business interests, products or services;

3. Data we may collect

3.1 The personal data we collect generally includes:

- (a) name;
- (b) date of birth;
- (c) postal or email address; or
- (d) phone numbers, including home, mobile and work;
- (e) fax number;
- (f) occupation;
- (h) credit card details