



NOTE: this document contains the AbbeyX Ltd external Privacy Policy. It is accessible via a link from the AbbeyCross website at www.abbeycross.com at the bottom of each web page where you can verify it

AbbeyX Ltd Privacy Policy

This privacy policy applies to all processing of personal data by AbbeyX Ltd or any other members of its group (including AbbeyCross Inc) (together, "**AbbeyCross**", "**we**", "**our**" or "**us**") where such processing is carried out in the UK or otherwise relating to its UK business.

AbbeyCross is a marketplace for deliverable emerging markets currency and a provider of market data and supervisory solutions for emerging markets currency trading, providing users ("**Users**") with market transparency, competitive pricing, deeper liquidity and better compliance.

AbbeyCross is committed to ensuring that your privacy is protected and we comply with the UK General Data Protection Regulation ("**GDPR**") and other relevant data protection and privacy laws (together, the "**Data Protection Laws**").

For the purpose of the Data Protection Laws, **AbbeyX Ltd** (registered number 12168958), with registered address Collingham House 10-12 Gladstone Road, Wimbledon, London, United Kingdom, SW19 1QT is the controller of the personal information processed for the purposes set out below and we are responsible for looking after it.

We process personal data of customers of Users and the ultimate beneficiaries of payments which Users request through our services, as a processor of the relevant User. This privacy policy does not apply to our processing of this data. Instead, the privacy policy of the relevant User, who is the controller of such processing, applies.

Who is this policy addressed to?

References in this notice to "**you**" or "**your**" are references to Users (or, where those Users are corporate entities), members of personnel of those Users and any other individual whose personal data AbbeyCross collects and processes.

The information we collect and how we use it

Under the Data Protection Laws, we are required to explain what information we collect from you and how and why we use your personal information (the "**processing activity**"). We are also required to have a "**lawful basis**" on which to process your personal information. This is summarised in the table below.

Processing activity: Why we use your information?	What information is collected?	Lawful basis of processing
To establish, develop and preserve business relationships with our Users and other individuals with whom we deal.	<ul style="list-style-type: none">• name,• address,• phone number,• email address	The processing is necessary for our legitimate interest to provide our services to you.
To create, establish and administer our Users' accounts.	<ul style="list-style-type: none">• name,• address,• phone number,• email address,• username,	To take steps at your request to create, establish and administer a contract with you. Or, where we do not have an agreement directly with you, the processing is

Processing activity: Why we use your information?	What information is collected?	Lawful basis of processing
	<ul style="list-style-type: none"> password, account number, payment method details, payments made or due, details of authorised persons on the account, identity documents (e.g. driver's licence, utility bills or passport), information from third parties (with your consent or authorisation), namely financial institutions, banks and payment service providers you or any recipient uses to transfer monies. 	necessary for our legitimate interest to provide you with a good customer experience and to provide you with features to keep your account secure
To provide, and assist us in providing and improving the provision of, the products or services that we offer and ensure that all related transactions are supported and implemented	<ul style="list-style-type: none"> name, address, phone number, email address, information pertaining to your use of our products and services. 	The processing is necessary for our legitimate interest to promote our business and our products and services.
To conduct surveys on the quality of our products, services or customer service or to provide our Users with offers for additional products and services that we feel may be of interest to our Users or that we believe meet our Users' changing needs.	<ul style="list-style-type: none"> name, address, phone number, email address other information deemed important to complete surveys. 	<p>The processing is necessary for our legitimate interest to promote our business and our products and services.</p> <p>We will only send you marketing by email if you have given us your prior consent or (in some cases where you are an existing or former Customer), where you have not otherwise opted-out.</p> <p>You have a right to stop us from sending you direct marketing at any time. You may do so by clicking the "unsubscribe" link in our marketing emails, or by contacting our Data Protection contact using the details set out in this policy.</p>
To verify and authenticate the identity of our Users and other individuals with whom we deal, and preserve their privacy when they contact us by telephone, electronic means or otherwise	<ul style="list-style-type: none"> name, address, phone number, email address, mobile number, identity documents (i.e. driver's licence or passport), information from third parties (with your consent or otherwise authorised), namely financial institutions, banks and payment service 	The processing is necessary for our legitimate interests to protect our business and co-operate with law enforcement authorities.

Processing activity: Why we use your information?	What information is collected?	Lawful basis of processing
	<p>providers to verify your identity.</p> <ul style="list-style-type: none"> Information from public sources to verify your identity information. 	
For internal training, quality assurance, data analysis, statistical and research purposes and to measure the effectiveness of advertising we serve	<ul style="list-style-type: none"> email records 	The processing is necessary for our legitimate interests to improve our offering and provide you with a good customer experience.
To manage our business and ensure the efficiency, reliability and security of our systems and networks	<ul style="list-style-type: none"> name address, phone number, email address. 	The processing is necessary for us to comply with our legal obligations.
To meet legal and regulatory requirements and allow AbbeyCross to meet contractual requirements relating to the products and services provided to Users	<ul style="list-style-type: none"> name address, phone number, email address. other information provided by you. 	The processing is necessary for us to comply with our legal obligations.
To detect and prevent fraud and other illegal uses of our product and services and to comply with “know-your-customer” terrorist financing and anti-money laundering requirements	<ul style="list-style-type: none"> name account number, information relating to your use of our services; and reports provided by fraud prevention agencies. information about credits and debits processed through the services, payment transaction reference, and transaction data including transaction history. 	The processing is necessary for our legitimate interests to protect our business and co-operate with law enforcement authorities.
To process job applications of prospective employees of AbbeyCross	<ul style="list-style-type: none"> name address phone number CV information country/region of residence references, correspondence with you relating to any application. 	The processing is necessary for our legitimate interest to review and interview job candidates.

Where we process personal data on the legal basis of 'legitimate interests' (as indicated in the above table), we have determined, acting reasonably and considering the circumstances, that we are able to do so after carrying out a balancing exercise to make sure that our legitimate interests are not overridden by your interests, rights and freedoms. Where we rely on this legal basis, (a) we process the data only to the extent that is necessary for the relevant purpose; and (b) the relevant processing activities can be reasonably expected. The legitimate interests we pursue are specified in the above table with respect to each relevant purpose.

Where we process personal data on the legal basis of 'consent' (as indicated in the above table), you may refuse to consent to our processing and you may also withdraw your consent at any time: (i) in respect of cookies and other tracking mechanisms used on our website, by using the cookie consent manager in our cookie notification banner and as otherwise described in the AbbeyCross privacy policy, (ii) in respect of marketing communications, as set out in the "marketing communications" section below, or (iii) in respect of other matters, by contacting our Data Protection contact at enquiries@abbeycross.net. Withdrawing consent does not affect any processing carried out without your consent.

How we collect data

Most personal data will be collected directly from you or the company for whom you work for example through the Customer onboarding processes or from you via our website. The sources of any personal data collected indirectly are mentioned in this statement.

Data retention period

We will retain your data for:

- As long as necessary to deal with your query
- As long as you might legally bring a claim against us
- Where a Customer, after your account has been closed or otherwise come to an end based on our legal and regulatory requirements

Opting out of marketing communications

You are free to opt out of receiving all marketing communications from us and our partners at any time by contacting us or logging into your online account. Should you be opted in to receive email correspondence, there is an unsubscribe link in each email we send out, if you use this, we will not send any unsolicited mail to your registered email address.

Communications regarding changes to existing products or services held, our terms, conditions and policies is important and sometimes critical. You may not opt out of receiving these communications.

Security

We have in place appropriate policies, rules and technical and organisational measures to protect your personal information from unauthorised or unlawful processing, and against accidental loss, destruction or damage.

We also have procedures in place to deal with any data security breach. We will notify you and any applicable regulator of a data security breach where we are legally required to do so.

Sharing your personal information

We will only disclose your personal information to:

- companies within our group both in and outside of the UK and/or European Economic Area;
- our professional advisors (including without limitation tax, legal or other corporate advisors who provide professional services to us);
- payment providers;
- other third party suppliers, business partners and sub-contractors for business administration, support, processing, services, or IT purposes;
- analytics or search engines, that enable us to optimise and improve your Website experience;
- other third party suppliers for marketing purposes;
- third parties that you approve (including without limitation, social media sites);
- our regulators, law enforcement or fraud prevention agencies, as well as our legal advisers, courts, the police and any other authorised bodies, for the purposes of investigating any actual or suspected criminal activity or other regulatory or legal matters; and
- tax authorities or agencies to comply with our legal and regulatory obligations.

We will disclose your personal information to third parties:

- in the event that we consider selling or buying any business or assets, in which case we will disclose your personal information to any prospective sellers or buyers of such business or assets;
- in the event we are the subject of any insolvency situation (e.g. the administration or liquidation);
- if we, or substantially all of our assets, are acquired by a third party, in which case personal information held by us about our Users will be one of the transferred assets;
- where you have provided your consent;
- in order to enforce or apply our terms and conditions;
- to protect our rights, property, or safety, or that of our staff, our Users, or others. This includes exchanging information with other companies and organisations (including without limitation tax authorities, the local police or other local law enforcement agencies) for the purposes of staff and customer safety, crime prevention, fraud protection and credit risk reduction; and
- if we are under a duty to disclose or share your personal information in order to comply with any legal obligation or regulatory requirements, or otherwise for the prevention or detection of fraud or crime.

International transfers of your personal information

We may transfer personal information to countries other than the country in which the data was originally collected (for example, outside the UK or European Economic Area (“**EEA**”)) in connection with the purposes set out in this privacy policy. These countries may not have the same data protection laws as the country in which you initially provided the information and may not provide the same level of protection.

We have taken appropriate safeguards to require that your personal data will remain protected in accordance with this privacy policy. For example, if we transfer personal data from the UK or EEA to one of our group companies or another recipient located in a country outside the UK or EEA which has not been deemed to have adequate protection to data, such as the United States, we will implement an appropriate data export solution such as the European Commission's Standard Contractual Clauses or otherwise take measures to provide an adequate level of data protection in accordance with Data Protection Laws.

Your rights

Right	Description
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To be informed	You have the right to be informed about the personal information we hold about you.
Of access	You have the right to request confirmation that your personal data is being processed, access to your personal data (through us providing a copy) and other information about how we process your personal data.
To rectification	You have the right to request that we rectify your personal data if it is not accurate or not complete.
To erasure	<p>You have the right to ask us to delete the personal information we hold about you. This right will only apply where (for example):</p> <ul style="list-style-type: none"> • we no longer need to use the personal information to achieve the purpose we collected it for; • where you withdraw your consent if we are using your personal information based on your consent; or • where you object to the way we process your data (in line with Right 7 below).
To restrict processing	<p>In certain circumstances, you have the right to restrict our processing of the personal information we hold about you. This right will only apply where (for example):</p> <ul style="list-style-type: none"> • you dispute the accuracy of the personal information held by us; • where you would have the right to ask us to delete the personal information but would prefer that our processing is restricted instead; or • where we no longer need to use the personal information to achieve the purpose we collected it for, but you need the data for the purposes of establishing, exercising or defending legal claims.
To data portability	In certain circumstances, you have the right to receive the personal information you have given us, in a structured, commonly used and machine readable format. You also have the right to require us to transfer this personal information to another organisation, at your request.
To object	You have the right to object to our processing of the personal information we hold about you where our lawful basis is for the purpose of our legitimate interests, unless we are able to demonstrate, on balance, legitimate grounds for continuing to process the personal information which override your rights or which are for the establishment, exercise or defence of legal claims.
In relation to automated decision making and profiling	You have the right for you not to be subject to a decision based solely on an automated process, including profiling, which produces legal effects concerning you or similarly significantly affect you. We do not carry out any automated processing or profiling.

To withdraw	You have the right to withdraw your consent, where we are relying on it to use your personal information (for example, to provide you with brochures and newsletters).
To post-mortem guidance	Applicable to French data subjects: you have the right to provide guidelines regarding the retention, deletion and communication of your personal data after your death.
To complain	If you deem that your rights under the applicable local laws and regulations have been infringed, you have the right to lodge a complaint with the competent supervisory authority for data protection in your country.

How to Contact Us

If you have any queries or complaints about our collection, storage or use of your personal information, or if you wish to exercise any of your rights in relation to your personal information, please contact us at:

–Email: info@abbeycross.com

– Post:

Collingham House 10-12 Gladstone Road, Wimbledon, London, United Kingdom, SW19 1QT

Data Protection Authority

We encourage you to contact us first if you have any queries, comments or concerns about the way we handle your personal information. However, as noted above, you also have the right to make a complaint to your local supervisory authority. Contact information relating to these authorities is below:

UK	First Contact Team, Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF.
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Changes to this policy

AbbeyCross will review and update its policies and procedures as required to keep current with rules and regulations, new technologies, standards and customer concerns. Our privacy policy may therefore change from time to time. We will post any privacy policy changes on our website and, if the changes are significant, we will provide a more prominent notice.

This policy was last reviewed and updated in **October 2023**.