# Privacy Policy FICC Markets Standards Board Limited

# Your privacy is critically important to us and we wish you to know:

- We are thoughtful about the personal information we ask you to provide and the personal information that we collect about you through the operation of our services.
- We store personal information for only as long as we have a reason to keep it.
- We aim to make it as simple as possible for you to control what information is shared publicly (or kept private), indexed by search engines, and permanently deleted.
- We help protect you from overreaching government demands for your personal information.
- We aim for full transparency on how we gather, use, and share your personal information.

Below is our Privacy Policy, which incorporates and clarifies these principles.

## **What This Policy Covers**

This Privacy Policy applies to information that we collect about you when you use our website and/or sign up for email updates.

Please note that this Privacy Policy does not apply to any of our products or services that have a separate privacy policy.

#### **Information We Collect**

We only collect information about you if we have a reason to do so.

#### Information You Provide to Us

It's probably no surprise that we collect information that you provide to us. The amount and type of information depends on the context and how we use the information. Here are some examples:

- **Basic Membership Information:** We ask for basic information from our members and users such as name, company name and email address.
- **Communications With Us:** You may also provide us information when you respond to surveys or post a comment.

## Information We Collect Automatically

• **Log Information:** We may collect information that web browsers, mobile devices, and servers typically make available, such as the browser type, IP address, unique device identifiers, language preference, referring site, the date and time of access, operating system, and mobile network information.

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- Usage Information: We may collect information about your usage of our services.
- **Location Information:** We may determine the approximate location of your device from your IP address. We may collect and use this information to, for example, calculate how many people visit our services from certain geographic regions.

#### Information We Collect from Other Sources

We may also get information about you from other sources.

# **How And Why We Use Information**

# Purposes for Using Information

We may use information about you as mentioned above and for the purposes listed below:

- To provide, further develop and improve our services;
- To monitor and analyse trends and better understand how users interact with our services, which helps us improve our services and make them easier to use;
- To measure, gauge, and improve the effectiveness of our website, and better understand user retention and attrition;
- To monitor and prevent any problems with our services, protect the security of our services, detect and prevent fraudulent transactions and other illegal activities, fight spam, and protect the rights and property;
- To communicate with you, for example through an email to, solicit your feedback, or keep you up to date; and
- To personalise your experience using our services, provide content recommendations.

## Legal Bases for Collecting and Using Information

A note here for those in the European Union about our legal grounds for processing information about you under EU data protection laws, which is that our use of your information is based on the grounds that:

- 1) The use is necessary in order to fulfil our commitments to you under our Terms of Service or other agreements with; or
- 2) The use is necessary for compliance with a legal obligation; or
- 3) The use is necessary in order to protect your vital interests or those of another person; or
- 4) We have a legitimate interest in using your information for example, to provide and update our services, to improve our services, to safeguard our services, to communicate with you, to measure, gauge, and improve the effectiveness of our services, or to monitor and prevent any problems with our services; or
- 5) You have given us your consent.

# **Sharing Information**

#### How We Share Information

We do not sell our users' private personal information.

We share information about you in the limited circumstances spelled out below and with appropriate safeguards on your privacy:

- Subsidiaries, Employees, and Independent Contractors: We may disclose
  information about you to our subsidiaries, our employees, and individuals who are our
  independent contractors that need to know the information in order to help us provide our
  services or to process the information on our behalf. We require our subsidiaries,
  employees, and independent contractors to follow this Privacy Policy for personal
  information that we share with them.
- **Third Party Vendors:** We may share information about you with third party vendors who need to know information about you in order to provide their services to us, or to provide their services to you (for example, see our cookie policy below).
- **Legal Requests:** We may disclose information about you in response to a subpoena, court order, or other governmental request.
- To Protect Rights, Property, and Others: We may disclose information about you when
  we believe in good faith that disclosure is reasonably necessary to protect the property or
  rights of FICC Markets Standards Board Limited, third parties, or the public at large.
- Business Transfers: In connection with any merger, sale of company assets, or
  acquisition of all or a portion of our business by another company, or in the unlikely event
  that FICC Markets Standards Board Limited goes out of business, user information would
  likely be one of the assets that is transferred or acquired by a third party. If any of these
  events were to happen, this Privacy Policy would continue to apply to your information and
  the party receiving your information may continue to use your information, but only
  consistent with this Privacy Policy.
- **With Your Consent:** We may share and disclose information with your consent or at your direction.
- **Aggregated or De-Identified Information:** We may share information that has been aggregated or reasonably de-identified, so that the information could not reasonably be used to identify you.

## Cookie policy

Cookies are small text files that are placed on your computer or other device by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. The following privacy overview is available to users when they visit the website.

#### Privacy overview

## Privacy overview

Cookie information is stored in your browser and performs functions such as recognising you when you return to our website and helping our team to understand which sections of the website you find most interesting and useful.

## Strictly necessary cookies

Strictly necessary cookies should be enabled at all times so that we can save your preferences for cookie settings. If you disable this cookie, we will not be able to save your preferences. This means that every time you visit this website you will need to enable or disable cookies again.

## Third party cookies

When someone visits our website we use a third party service, Google Analytics, to collect anonymous information such as the number of visitors to the site, and the most popular pages. We use this to keep track of the number of visitors to the different sections of our website and understand how it is being used.

Keeping this cookie enabled helps us to improve our website.

We use the following cookies:

## \_ga (Google Analytics)

Used to distinguish users. (Expires after 2 years)

## \_gid (Google Analytics)

Used to distinguish users. (Expires after 1 year)

# \_gat (Google Analytics)

Used to throttle request rate. If Google Analytics is deployed via Google Tag Manager, this cookie will be named \_dc\_gtm\_property-id>.

## AMP\_TOKEN (Google Analytics)

Contains a token that can be used to retrieve a Client ID from AMP Client ID service. Other possible values indicate opt-out, inflight request or an error retrieving a Client ID from AMP Client ID service. (Expires between 30 seconds to 1 year)

## \_gac\_property-id> (Google Analytics)

Contains campaign related information for the user. If you have linked your Google Analytics and AdWords accounts, AdWords website conversion tags will read this cookie unless you opt-out.

## gdpr[allowed\_cookies], gdpr[consent\_types], moove\_gdpr\_popup

These cookies are used to store your cookie preferences if you opt in to receiving any cookies from the website.

# wp-settings-1, wp-settings-time-1

These are essential cookies set by Wordpress in order to run the website.

Cookies can be removed by deleting them from your browser history (cache) when you leave the site. You can find more information about cookies, including how to control the use of these through your browser settings at <u>Allaboutcookies.org</u> or www.aboutcookies.org.

If you want to opt out of being tracked by Google Analytics across all websites, please visit <a href="http://tools.google.com/dlpage/gaoptout">http://tools.google.com/dlpage/gaoptout</a>.

You can find out how to manage cookies on popular browsers through the following websites:

- Google Chrome
- Microsoft Edge
- Mozilla Firefox
- Microsoft Internet Explorer
- Opera
- Apple Safari

## Information Shared Publicly

Information that you choose to make public is disclosed publicly.

Public information may also be indexed by search engines or used by third parties.

#### **How Long We Keep Information**

We generally discard information about you when we no longer need the information for the purposes for which we collect and use it – which are described in the section above on How and Why We Use Information – and we are not legally required to continue to keep it.

#### **Security**

While no online service is 100% secure, we work very hard to protect information about you against unauthorized access, use, alteration, or destruction, and take reasonable measures to do so, such as monitoring our services for potential vulnerabilities and attacks.

#### Choices

You have several choices available when it comes to information about you:

- **Limit the Information that You Provide:** If you are a member or user, you can choose not to provide profile information.
- **Limit Access to Information On Your Mobile Device:** Your mobile device operating system should provide you with the ability to discontinue our ability to collect stored information or location information via our mobile apps.
- **Opt-Out of Electronic Communications:** You may opt out of receiving informational messages from us. Just follow the instructions in those messages. If you opt out of informational messages, we may still send you other messages, for example legal notices.

# **Your Rights**

If you are located in certain countries, including those that fall under the scope of the European General Data Protection Regulation (AKA the "GDPR"), data protection laws give you rights with respect to your personal data, subject to any exemptions provided by the law, including the rights to:

Request access to your personal data;

- Request correction or deletion of your personal data;
- Object to our use and processing of your personal data;
- Request that we limit our use and processing of your personal data; and
- Request portability of your personal data.

EU individuals also have the right to make a complaint to a government supervisory authority.

# **Controllers and Responsible Companies**

FICC Markets Standards Board Limited is the controller of personal information, which means that we are responsible for processing that information.

#### **How to Reach Us**

If you have a question about this Privacy Policy, or you would like to contact us about any of the rights mentioned in the Your Rights section above, please contact us at <a href="mailto:secretariat@fmsb.com">secretariat@fmsb.com</a> or at +44 (0) 203 961 6150.

## **Other Things You Should Know**

#### **Privacy Policy Changes**

Although most changes are likely to be minor, FICC Markets Standards Board Limited may change its Privacy Policy from time to time. If we make changes, we will notify you by revising the change log below, and, in some cases, we may provide additional notice or send you a notification through email

## **Change log**

29 November 2019: Privacy policy updated to incorporate cookies policy.

7 June 2018: Privacy policy implemented.