



Privacy and the FMSB

Protecting the privacy of the people who give us their data is critically important to us. Our privacy policy sets out how we handle personal data, and how we protect the privacy of the individuals whose data we process.

The FICC Markets Standards Board Limited ('FMSB', 'we', 'us' or 'our') is a standards setting body for the wholesale fixed income, currencies and commodities (FICC) market. FMSB is practitioner led, and funded by members which include banks, asset managers, corporations, brokers, trading platforms, exchanges and infrastructure providers.

Our mission is to enhance standards of behaviour in FICC markets by developing clear standards and guidance on conduct which fill the gap between high-level principles and detailed regulation.

We may need to process personal data as part of our work, for example from our members, business contacts, members of the public, and users of our website ('you' or 'yours').

Privacy policy

Our principles

- 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 aim for full transparency on how we gather, use, and share your personal information.

Our Privacy Policy incorporates and clarifies these principles.

What this policy covers

This Privacy Policy applies to information that we collect about you.

Controllers and responsible companies

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

Information we collect

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

Information you provide to us

We collect information that you provide to us. The amount and type of information depends on the context and how we use the information. For example:

- **Basic membership information:** We ask for basic information from our members such as name, company name, and email address.
- **Signing up to updates/communications from us:** You may provide us with information so that we can send you updates or other communications.
- **Communications with us:** You may also provide us information when you respond to a Transparency Draft, or a survey.

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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.
- **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, for example to understand in which geographic regions our services are accessed by users.

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 to:

- provide, further develop, and improve our products and services;
- monitor and analyse trends and better understand how users interact with our products and services, which helps us improve them;
- measure, gauge, and improve the effectiveness of our website, and other communications;
- 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;
- confirm your role or participation in FMSB work if requested as part of reference checking conducted by an employer, prospective employer, or other agency;
- communicate with you, for example through an email to seek your feedback, or keep you up to date; and
- personalise your experience using our products and services, e.g. provide content recommendations.

Sharing information

How we share information

We do not sell your private personal information.

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

- **FMSB employees, secondees from other organisations and independent contractors who are developing a product or service:** By responding to a Transparency Draft, as well as your personal details, you may provide opinions or other information. The response will be assessed to inform our work as a standards setter. We may use your details to contact you to clarify any aspects of your response. All responses will be anonymised, and generalised categories applied to provide context to the response (e.g. buy-side, wholesale bank, or asset manager) before sharing with FMSB members developing the product or service in a committee, sub-committee or working group, or any other organisation. All personal data will be redacted from the responses within five years of receipt. Information provided in response to the Transparency Draft, including personal information, may be subject to publication or disclosure to other parties in accordance with access to information regimes, or as otherwise required by law. Please indicate if you regard all, or some of, the information you provide as confidential. If we receive a request for disclosure of this information, we will take your indication(s) into account but cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system on emails will not, of itself, be regarded as binding on us.

- **Employees, secondees and independent contractors:** We may disclose information about you to our employees, secondees from other organisations 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 employees, secondees 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.
- **Legal requests:** Where legally required to do so, we may disclose information about you in response to a subpoena, court order, or other legal or 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 or merger with another organisation:** 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 as far as it is 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

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.

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.

Security

While no online service is 100% secure, we work hard to protect information about you against unauthorised 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.
- **Opt-out of electronic communications:** We use a third-party provider, MailChimp, based in the United States, to manage subscriptions and deliver our email updates through their standard service. MailChimp participates in, and has certified its compliance with, a recognised EU-U.S. privacy framework. For more information about MailChimp's security practices and privacy policy visit mailchimp.com/legal/privacy. You may opt out of receiving emails by following the instructions in the email. You can also email secretariat@fmsb.com to unsubscribe.
- **Cookies:** 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 [Allaboutcookies.org](https://www.aboutcookies.org) or www.aboutcookies.org.

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

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

- [Google Chrome](https://www.google.com/policies/cookies/)
- [Microsoft Edge](https://privacy.microsoft.com/en-gb/default.aspx)
- [Mozilla Firefox](https://support.mozilla.org/en-US/kb/cookies-all-you-need-to-know)

- [Microsoft Internet Explorer](#)
- [Opera](#)
- [Apple Safari](#)

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.

For FMSB members, we retain personal information for a period of seven years from the date of provision for the purposes of confirming your role with the FICC Standards Markets Board Limited if required. For example, if an employer/prospective employer wishes to confirm your role at FMSB.

Your rights

If you are located in certain countries, including those that fall under the scope of the European General Data Protection Regulation (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, and deletion or correction of, information about you;
- object to how we use and process your information;
- request that we limit our use and processing of your personal data;
- request that your personal data be transferred to another organisation; and
- complain to the Information Commissioner's Office if you are unhappy about the way we use information about you. EU individuals also have the right to make a complaint to a government supervisory authority.

Find out more about your privacy rights

If you are interested in learning more about your privacy rights, more information is available from the Information Commissioner's Office on the [ICO website](#).

How to contact 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 email secretariat@fmsb.com or +44 (0) 203 961 6150.

Changes to this Privacy Policy

We may change our Privacy Policy from time to time. We will publish it on the website, and update the change log.

Change log

24 April 2020: Privacy policy updated to incorporate how we deal with personal data provided in responses to Transparency Drafts, together with stylistic changes to the document.

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

7 June 2018: Privacy policy implemented.