

General Data Privacy Policy

Policy Objective:

- This Privacy Policy explains what we do with your personal data. It describes how we collect, use and process your personal data, and how, in doing so, we comply with our legal obligations to you. Your privacy is important to us, and we are committed to protecting and safeguarding your data privacy rights.

Who does this Policy apply to?

- This Privacy Policy applies to the personal data of [End Users](#), [Suppliers](#), [Commodities Producers](#), [Counterparties](#), [Job Applicants](#), [Website Users](#), and [other people whose personal data we may process](#) as the emergency contacts and dependents of our [Staff](#). To be clear, if you are a member of ECTP Staff, you should refer to the ECTP Global Staff Data Privacy Policy, which is available on the ECTP intranet.
- For the purpose of applicable data protection legislation (including but not limited to the General Data Protection Regulation (Regulation (EU) 2016/679) (the "[GDPR](#)"), the company responsible for your personal data ("**ECTP**" or "**us**") can be found [here](#).
- This Privacy Policy applies in relevant countries throughout our international network. Different countries may approach data privacy in slightly different ways and so we may have country-specific parts to this Privacy Policy.

Key Principles/Controls:

- Description of types of data processed by ECTP
- Manner of collection, use, protection and retention of personal data consistent with the GDPR

It is important to point out that we may amend this Privacy Policy from time to time. Please visit this page if you want to stay up to date, as we will post any changes here.

If you are dissatisfied with any aspect of our Privacy Policy, you may have legal rights. We have described these as well where relevant.

Table of Contents

| | | |
|-----|--|----|
| 1 | OBJECTIVE AND SCOPE | 3 |
| 2 | WHAT KIND OF PERSONAL INFORMATION DO WE COLLECT? | 3 |
| 3. | HOW DO WE COLLECT YOUR PERSONAL DATA? | 6 |
| 4. | HOW DO WE USE YOUR PERSONAL DATA? | 8 |
| 5. | WHO DO WE SHARE YOUR PERSONAL DATA WITH? | 12 |
| 6. | HOW DO WE SAFEGUARD YOUR PERSONAL DATA? | 13 |
| 7. | HOW LONG DO WE KEEP YOUR PERSONAL DATA FOR?..... | 13 |
| 8. | HOW CAN YOU ACCESS, AMEND OR TAKE BACK THE PERSONAL DATA THAT YOU HAVE GIVEN TO US? | 14 |
| 9. | WHO IS RESPONSIBLE FOR PROCESSING YOUR PERSONAL DATA? | 16 |
| 10. | HOW DO WE STORE AND TRANSFER YOUR DATA INTERNATIONALLY?..... | 17 |
| 11. | COOKIES POLICY | 18 |
| 12. | OUR LEGAL BASES FOR PROCESSING YOUR DATA | 19 |

Policy

1 OBJECTIVE AND SCOPE

ECTP entities (“ECTP”) are committed to using all reasonable endeavours to ensure compliance with the requirements of Data Protection and Privacy laws and regulations. To comply with the GDPR and other applicable data privacy laws, information about individuals must be collected and used for a lawful purpose, stored safely and securely, not disclosed to any third party unlawfully, and eliminated consistent with GDPR principles.

2 WHAT KIND OF PERSONAL INFORMATION DO WE COLLECT?

The information described below is in addition to any personal data we are required by law to process in any given situation.

END USER DATA:

- We will collect the contact details of individuals at your organisation (such as names, telephone numbers, job title and email or postal addresses) in order to ensure our relationship runs smoothly. If we are required to carry out "Know Your Customer" verification checks to comply with our regulatory and legal obligations, we may also collect specific information about relevant individuals. This information may include, for example, date of birth, payment details, tax residence information, copies of photo identification such as a driving licence and/or passport/identity card, information about nationality/citizenship/place of birth, national identification numbers and other identity verification documents. We may also hold extra information that someone in your organisation has chosen to tell us or that you have chosen to tell an ECTP [Staff](#) member. In certain circumstances, calls with you may be recorded, depending on the applicable local laws and requirements. If we need any additional personal data for any reason, we will let you know.
- To the extent that you access our website, we will also collect certain data from you. If you would like more information about this, please click [here](#).

SUPPLIER DATA:

- We'll collect your contact details or the details of individuals at your organisation (such as names, telephone numbers, job title and email or postal addresses, locations of your relevant staff such as drivers) in order to ensure our relationship runs smoothly. We will also collect bank details, so that we can pay you. We may also hold extra information that someone in your organisation has chosen to tell us. In certain circumstances, our calls with you may be recorded, depending on the applicable local laws and requirements.
- To the extent that you access our website, we will also collect certain data from you. If you would like more information about this, please click [here](#).

COUNTERPARTIES AND COMMODITIES PRODUCERS DATA:

- We'll collect your contact details or that of individuals at your organisation (such as names, telephone numbers, job title, email or postal addresses, identifiers for any relevant messenger services or bank details) in order to ensure the our interactions run smoothly. We may hold additional information that someone in your organisation has chosen to tell us or that you have chosen to tell an ECTP [Staff](#) member. In certain circumstances, calls with you may be recorded, depending on the applicable local laws and requirements.
- We will also collect your passport number or national identification number as well as your date of birth in order to comply with our legal and regulatory obligations.
- To the extent that you access our website, we will also collect certain data from you. If you would like more information about this, please click [here](#).

JOB APPLICANT DATA:

- Depending on the relevant circumstances and applicable local laws and requirements, we may collect some or all of the information listed below to enable us to engage in a recruitment exercise. In some jurisdictions, we are restricted from processing some of the data outlined below. In such cases, we will not process the data in those jurisdictions
 - Name;
 - Age/date of birth;
 - National identification number;
 - Sex/gender;
 - Marital status;
 - Contact details;
 - Photograph;
 - Education details;
 - Employment history;
 - Emergency contacts and details of any dependants;
 - Referee details;
 - Immigration status (whether you need a work permit);
 - Nationality/citizenship/place of birth;
 - A copy of your driving licence and/or passport/identity card;
 - Financial information (where we need to carry out financial background checks);
 - Social security number (or equivalent in your country) and any other tax-related information;
 - Diversity information including racial or ethnic origin, religious or other similar beliefs, and physical or mental health, including disability-related information;
 - Details of any criminal convictions if this is required for a role that you are interested in applying for;

- Details about your current remuneration, pensions and benefits arrangements;
 - Information on your interests and needs regarding future employment, both collected directly and inferred, for example from jobs viewed or articles read on our website;
 - Extra information that you choose to tell us;
 - Extra information that your referees choose to tell us about you;
 - Extra information that we find from other third party sources such as job sites;
 - IP address; and
 - CCTV footage if you attend our premises.
- Please note that the above list of categories of personal data we may collect is not exhaustive.
 - To the extent that you access our website, we will also collect certain data from you. If you would like more information about this, please click [here](#).

PEOPLE WHOSE DATA WE RECEIVE FROM JOB APPLICANTS AND STAFF, SUCH AS REFEREES AND EMERGENCY CONTACTS:

- To ask for a reference, we need the referee's contact details (such as name, email address and telephone number). We will also need these details if a job applicant or a member of our [Staff](#) has put you down as their emergency contact so that we can contact you in the event of an accident or an emergency.
- We may collect your date of birth, postal address and potentially some health information if a member of our [Staff](#) has put you down as a dependent for an benefit connected with their employment or if a member of our [Staff](#) exercises certain employment rights. We may also be provided with information tending to indicate your sexual orientation if a member of our [Staff](#) identifies you as a spouse or partner when putting you down as a dependent or next of kin.
- To the extent that you access our website, we will also collect certain data from you. If you would like more information about this, please click [here](#).

WEBSITE USERS

- We collect a limited amount of data from our [Website Users](#) that we use to help us to improve your experience when using our website and to help us manage the services we provide. This includes information such as how you use our website, the frequency with which you access our website, your browser type, the location you view our website from, the language you choose to view it in and the times that our website is most popular. If you contact us via the website, we will collect any information that you provide to us, for example your name and contact details.
- If you would like to find out more information about what data we collect about you when you visit our website, please click [here](#).

3 HOW DO WE COLLECT YOUR PERSONAL DATA?

END USER DATA:

- We collect personal data in three ways:
 1. Personal data that you give to us:
 - Where you contact us proactively, usually by phone or email; and/or
 - Where we contact you, either by phone or email,
 2. Personal data that we receive from other sources:
 - In limited circumstances, ECTP needs to know certain information about you in order to comply with its legal and regulatory obligations.
 - Where appropriate and in accordance with any local laws and requirements, we may seek more information about you or your organisation from other sources generally by way of due diligence or other market intelligence including:
 - From third party market research and by analysing online and offline media (which we may do ourselves, or employ other organisations to do for us); and
 - From other limited sources and third parties.
 3. Personal data that we collect automatically:
 - To the extent that you access our website, read, or click on an email from us, where appropriate and in accordance with any local laws and requirements, we may collect your data automatically or through you providing it to us. For more information, please click [here](#).

SUPPLIER DATA

- We collect personal data in three ways:
 1. Personal data that we receive directly from you;
 - Where you contact us proactively, usually by phone or email; and/or
 - Where we contact you, either by phone or email.
 2. Personal data that we receive from other sources;
 - Where appropriate and in accordance with any local laws and requirements, we may seek more information about you or your organisation from other sources generally by way of due diligence or other market intelligence including:
 - From third party market research and by analysing online and offline media (which we may do ourselves, or employ other organisations to do for us); and
 - From other limited sources and third parties.
 3. Personal data that we collect automatically.
 - To the extent that you access our website, read, or click on an email from us, where appropriate and in accordance with any local laws and requirements, we may collect your data automatically or through you providing it to us. For more information, please click [here](#).

COUNTERPARTIES AND COMMODITIES PRODUCERS DATA:

- We collect personal data in three primary ways:
 1. Personal data that you give to us;
 - Where you contact us proactively, usually by phone or email; and/or
 - Where we contact you, either by phone or email,
 2. Personal data that we receive from other sources;
 - ECTP needs to know certain information about you in order to comply with its legal and regulatory obligations.
 - Where appropriate, and in accordance with any local laws and requirements, we will be provided with such information about you from your organisation.
 - Where appropriate and in accordance with any local laws and requirements, we may also seek more information about you or your organisation from other sources generally by way of due diligence or other market intelligence including:
 - From third party market research and by analysing online and offline media (which we may do ourselves, or employ other organisations to do for us); and
 - From other limited sources and third parties.
 3. Personal data that we collect automatically:
 - To the extent that you access our website, read, or click on an email from us, where appropriate and in accordance with any local laws and requirements, we may collect your data automatically or through you providing it to us. For more information, please click [here](#).

JOB APPLICANT DATA:

- We collect personal data in three primary ways:
 1. Personal data that you give to us;
 - ECTP needs to know certain information about you in order to engage in a recruitment exercise and appoint the best applicants to ECTP.
 - There are numerous ways you can share your information with us. It all depends on what suits you. These may include:
 - Entering your details on an application form and supplying that to ECTP;
 - Leaving a hard copy CV at a ECTP office; or
 - Emailing your CV to an ECTP employee such as HR.
 2. Personal data we receive from other sources
 - We also receive personal data about job applicants from other sources. Depending on the relevant circumstances and applicable local laws and requirements, these may include personal data received in the following situations:
 - Your referees may disclose personal information about you;
 - We may obtain information about you from searching for potential applicants from third party sources, such as LinkedIn and other job sites;

- If you 'like' our page on Facebook or 'follow' us on Twitter we will receive your personal information from those sites; and
 - If you were referred to us through a recruitment agency, they may share personal information about you with us.
3. Personal data we collect automatically.
- To the extent that you access our website, read, or click on an email from us, where appropriate and in accordance with any local laws and requirements, we may collect your data automatically or through you providing it to us. For more information, please click [here](#).

WEBSITE USERS:

- When you visit our website there is certain information that we may automatically collect, whether or not you decide to use our services. This includes your IP address, the date and the times and frequency with which you access the website and the way you browse its content. We will also collect data from you when you contact us via the website, for example by using the chat function.
- We collect your data automatically via cookies, in line with cookie settings in your browser. If you would like to find out more about cookies, including how we use them and what choices are available to you, please click [here](#).

4 HOW DO WE USE YOUR PERSONAL DATA?

Having obtained data about you, we then make sure we use it appropriately.

END USER DATA:

- We use your personal data for:
 - [Trading Activities;](#)
 - [Marketing Activities; and](#)
 - [To help us to establish, exercise or defend legal claims.](#)

Trading Activities

- Below are the various ways in which we use your data in order to ensure the smooth running of our agreements and dealings with you.
 - Processing your data in order to carry out anti-money laundering and "Know Your Customer" checks in accordance with our legal and regulatory obligations;
 - Storing your details (and updating them when necessary) on our database, so that we can contact you in relation to our relevant activities;
 - Keeping records of our conversations and meetings, so that we can provide targeted services to you and in order to comply with our legal and regulatory obligations; and
 - Undertaking customer satisfaction surveys.

- We may use your personal data for these purposes if we deem this necessary for our legitimate interests. If you would like to know more about what this means, please click [here](#).
- If you are not happy about this, in certain circumstances you have the right to object and can find out more about how and when to do this [here](#).

Marketing Activities

- We may periodically send you information that we think you may find interesting. In particular, we may wish to use your data for the purposes listed below, where appropriate and in accordance with any local laws and requirements. Please note that this list is not exhaustive.
- To:
 - enable us to develop and market other products and services; and
 - send you details of reports, promotions, offers, networking and events, and general information about the industry sectors which we think might be of interest to you;

We need your consent for some aspects of these activities which are not covered by our legitimate interests (in particular, the collection of data via cookies, and the delivery of direct marketing to you through digital channels) and, depending on the situation, we'll ask for this via an opt-in or soft-opt-in (which we explain further below).

- Soft opt-in consent is a specific type of consent, which applies where you have previously engaged with us, and we are marketing other related services. Under 'soft opt-in' consent, we will take your consent as given unless or until you opt out. For other types of e-marketing, we are required to obtain your explicit consent.
- If you want to know more about how we obtain consent, please click [here](#). If you are not happy about our approach to marketing, you have the right to withdraw your consent at any time and can find out more about how to do so [here](#).
- If you are not happy about this, you have the right to opt out of receiving marketing materials from us and can find out more about how to do so [here](#).
- Please note that in certain of the jurisdictions in which we operate, we comply with additional local law requirements regarding marketing activities. For more information, please click [here](#).

To help us to establish, exercise or defend legal claims

- In more unusual circumstances, we may use your personal data to help us to establish, exercise or defend legal claims.

SUPPLIER DATA:

- We will use your information:
 - To store (and update when necessary) your details on our database, so that we can contact you in relation to our agreements or our dealings with you;
 - To offer services to you or to obtain support and services from you;
 - To perform certain legal and regulatory obligations, such as carrying out anti-money laundering and "Know Your Customer" checks;
 - Facilitating our payroll and invoicing processes;

- To help us to target appropriate marketing campaigns; and
- In more unusual circumstances, to help us to establish, exercise or defend legal claims.
- We may use your personal data for these purposes if we deem this necessary for our legitimate interests. If you want to know more about what this means, please click [here](#).
- We will not, as a matter of course, seek your consent when sending marketing messages to a corporate postal or email address.
- If you are not happy about this, in certain circumstances you have the right to object and can find out more about how to do so [here](#).
- Please note that in certain of the jurisdictions in which we operate, we comply with additional local law requirements. For more information, please click [here](#).

COUNTERPARTIES AND COMMODITIES PRODUCERS:

- We use your information in the following ways:
 - Storing (and updating when necessary) your details on our database, so that relevant ECTP [Staff](#) can contact you;
 - To offer services to you or to obtain support, goods and services from you;
 - To perform certain legal and regulatory obligations;
 - To carry out research for the purpose of producing analysis and materials for both internal and external use; and
 - Monitoring and storing records of calls and communications with ECTP [Staff](#);
 - Recording appropriate details of the transactions we have undertaken with you and disclosing the same to relevant regulatory authorities if required; and
 - In more unusual circumstances, processing in order to help us to establish, exercise or defend legal claims.
- We may use your personal data for these purposes if we deem this necessary for our legitimate interests. If you want to know more about what this means, please click [here](#).
- We may use your personal data in order to comply with our legal and regulatory obligations. For more information about this, please click [here](#).

JOB APPLICANT DATA:

- We generally use job applicant data in the following ways:
 - [Recruitment Activities](#);
 - [Equal Opportunities Monitoring](#); and
 - [To help us to establish, exercise or defend legal claims](#).

Recruitment Activities

- We have listed below various ways in which we may use your personal data for this purpose, where appropriate and in accordance with any local laws and requirements. Please note that this list is not exhaustive.

- Collecting your data from you and other sources, such as LinkedIn;
- Storing your details (and updating them when necessary) on our database, so that we can contact you in relation to recruitment;
- To facilitate the recruitment process;
- Assessing data about you against vacancies which we think may be suitable for you;
- Enabling you to submit your CV;
- Carrying out our obligations arising from any contracts entered into between us;
- Carrying out our obligations arising from any contracts entered into between ECTP and third parties in relation to your recruitment;
- Facilitating our payroll and invoicing processes;
- Carrying out satisfaction surveys;
- Verifying details you have provided, using third party resources (such as psychometric evaluations or skills tests), or to request information (such as references, qualifications and potentially any criminal convictions, to the extent that this is appropriate and in accordance with local laws); and
- Complying with our legal obligations in connection with the detection of crime or the collection of taxes or duties.
- We may use your personal data for the above purposes if we deem it necessary to do so for our legitimate interests. If you want to know more about what this means, please click [here](#). If you are not happy about this, in certain circumstances you have the right to object and can find out more about how and when to do this [here](#).

Equal Opportunities Monitoring:

- We are committed to ensuring that our recruitment processes are aligned with our approach to equal opportunities. Some of the data we may (in appropriate circumstances and in accordance with local law and requirements) collect about you comes under the umbrella of "diversity information". This could be information about your ethnic background, gender, disability, age, sexual orientation, religion or other similar beliefs, and/or social-economic background. Where appropriate and in accordance with local laws and requirements, we will use this information on an anonymised basis to monitor our compliance with our equal opportunities policy.
- This information is 'sensitive' personal data. We therefore need to obtain your explicit consent before we can collect it. We will ask for your consent by offering you an opt-in. This means that you have to explicitly, and clearly tell us that you agree to us collecting and using this information.
- We may collect other Sensitive Personal Data about you, such as health-related information, religious affiliation, or details of any criminal convictions if this is appropriate in accordance with local laws and is required for a role that you are interested in applying for. We will never do this without your explicit consent.
- If you would like to find out more about consent, please click [here](#).
- If you are not happy about this, you have the right to withdraw your consent at any time and you can find out how to do so [here](#)

To help us to establish, exercise or defend legal claims

- In more unusual circumstances, we may use your personal data to help us to establish, exercise or defend legal claims.

PEOPLE WHOSE DATA WE RECEIVE FROM JOB APPLICANTS AND STAFF, SUCH AS REFEREES, EMERGENCY CONTACTS AND DEPENDENTS:

- We will only use the information about you for the following purposes:
 - If a [Job Applicant](#) or [Staff](#) member put you down on our form as an emergency contact, we'll contact you in the case of an accident or emergency affecting them; or
 - If you were put down by a [Job Applicant](#) as a referee, we will contact you in order to take up a reference; or
 - If you put down by a [Staff](#) member as a next of kin or dependent, we will store your personal data to ensure the personnel records of the [Staff](#) member are correct and disclose your information to the relevant benefits provider. We may also process your personal data (including Sensitive Personal Data) to allow the [Staff](#) member to exercise certain employment rights.
- We may use your personal data for these purposes if we deem this necessary for our legitimate interests. If you would like to find out more about what this means, please click [here](#).
- If you are not happy about this, you have the right to object and can find out more about how to do so [here](#).

WEBSITE USERS:

- We use your data to help us to improve your experience of using our website, for example by analysing your recent job search criteria to help us to present jobs to you that we think you'll be interested in.
- If you would like to find out more about cookies, including how we use them and what choices are available to you, please click [here](#).

5 WHO DO WE SHARE YOUR PERSONAL DATA WITH?

Where appropriate and in accordance with local laws and requirements, we may share your personal data, in various ways and for various reasons, with the following categories of people:

- Any of our group or Affiliate companies;
- Individuals and organisations who hold information related to Job Applicant's reference or application to work with us, such as current, past or prospective employers, educators and examining bodies and employment and recruitment agencies;
- Tax, audit, regulatory bodies or other authorities, when we believe in good faith that the law or other regulation requires us to share this data (for example, because of a request by a tax authority, in connection with any anticipated litigation or in compliance with our legal and regulatory obligations);

- Third party service providers (including [Suppliers](#)) who perform functions on our behalf (including administrators, external consultants, business associates and professional advisers such as lawyers, auditors and accountants, transport and distribution suppliers, technical support functions and IT consultants carrying out testing and development work on our business technology systems);
- Third party outsourced IT and document storage providers where we have an appropriate processing agreement (or similar protections) in place;
- Marketing technology platforms and suppliers;
- If you are a [Commodities Producer](#), we may share your personal data with [Counterparties](#) and [End Users](#) as appropriate.
- In the case of [Job Applicants](#) and their referees, we may share your personal data with third parties who we have retained to provide services such as reference, qualification and criminal convictions checks, to the extent that these checks are appropriate and in accordance with local laws;
- If ECTP merges with or is acquired by another business or company in the future, we may share your personal data with the new owners of the business or company (and provide you with notice of this disclosure).

6 HOW DO WE SAFEGUARD YOUR PERSONAL DATA?

We are committed to taking all reasonable and appropriate steps to protect the personal information that we hold from misuse, loss, or unauthorised access. We do this by having in place a range of appropriate technical and organisational measures. These include measures to deal with any suspected data breach.

If you suspect any misuse, loss of, or unauthorised access to your personal information, please let us know immediately. Details of how to contact us can be found [here](#).

7 HOW LONG DO WE KEEP YOUR PERSONAL DATA FOR?

We will ordinarily process your data throughout the course of our interactions and will then generally retain it for an appropriate amount of time after we have parted ways. The precise length of time will depend the type of data, our legitimate business needs and other legal or regulatory rules that may require us to retain it for certain minimum periods. We may, for example, be required to retain certain data for the purposes of tax reporting or responding to tax queries. In other instances, there may be some other legal, regulatory or risk-management requirements to retain data, including where certain data might be relevant to any potential litigation (bearing in mind relevant limitation periods).

In determining the appropriate retention period for different types of personal data, we always consider the amount, nature, and sensitivity of the personal data in question, the potential risk of harm from unauthorised use or disclosure of that personal data, the purposes for which we need to process it and whether we can achieve those purposes by other means (in addition of course to ensuring that we comply with our legal, regulatory and risk-management obligations, as described above).

Once we have determined that we no longer need to hold your personal data, we will [Delete](#) it from our systems.

8 HOW CAN YOU ACCESS, AMEND OR TAKE BACK THE PERSONAL DATA THAT YOU HAVE GIVEN TO US?

One of the GDPR's main objectives is to protect and clarify the rights of EU citizens and individuals in the EU with regards to data privacy. This means that you retain various rights in respect of your data, even once you have given it to us. These are described in more detail below.

To get in touch about these rights, please [contact us](#). We will seek to deal with your request without undue delay, and in any event within one month (subject to any extensions to which we are lawfully entitled). Please note that we may keep a record of your communications to help us resolve any issues that you raise.

Right to object:

- This right enables you to object to us processing your personal data where we do so for one of the following four reasons: (i) our [legitimate interests](#); (ii) to enable us to perform a task in the public interest or exercise official authority; (iii) to send you direct marketing materials; and (iv) for scientific, historical, research, or statistical purposes.
- The "legitimate interests" and "direct marketing" categories above are the ones most likely to apply. If your objection relates to us processing your personal data because we deem it necessary for your legitimate interests, we must act on your objection by ceasing the activity in question unless:
 - we can show that we have compelling legitimate grounds for processing which overrides your interests; or
 - we are processing your data for the establishment, exercise or defence of a legal claim.
- If your objection relates to direct marketing, we must act on your objection by ceasing this activity.

Right to withdraw consent:

- Where we have obtained your consent to process your personal data for certain activities (for example, for our marketing arrangements or automatic profiling), you may withdraw this consent at any time and we will cease to carry out the particular activity that you previously consented to unless we consider that there is an alternative reason to justify our continued processing of your data for this purpose in which case we will inform you of this condition.

Data Subject Access Requests (DSAR):

- You may ask us to confirm what information we hold about you at any time, and request us to modify, update or delete such information. We may ask you to verify your identity and for more information about your request. If we provide you with access to the information we hold about you, we will not charge you for this unless your request is "manifestly unfounded or excessive". If you request further copies of this information from us, we may charge you a reasonable administrative cost where legally permissible. Where we are legally permitted to do so, we may refuse your request. If we refuse your request we will always tell you the reasons for doing so.

- Please note that in certain of the jurisdictions in which we operate, we comply with additional local law requirements regarding data subject access requests and may refuse your request in accordance with such laws. For more information, please click [here](#).

Right to erasure:

- You have the right to request that we erase your personal data in certain circumstances. Normally, the information must meet one of the following criteria:
 - the data are no longer necessary for the purpose for which we originally collected and/or processed them;
 - where previously given, you have withdrawn your consent to us processing your data, and there is no other valid reason for us to continue processing;
 - the data has been processed unlawfully (i.e. in a manner which does not comply with the GDPR);
 - it is necessary for the data to be erased in order for us to comply with our legal obligations as a data controller; or
 - if we process the data because we believe it necessary to do so for our legitimate interests, you object to the processing and we are unable to demonstrate overriding legitimate grounds for our continued processing.
- Please note that in certain of the jurisdictions in which we operate, we comply with additional local law requirements regarding data subject right to erasure and may refuse your request in accordance with local laws. For more information, please click [here](#).
- We would only be entitled to refuse to comply with your request for erasure for one of the following reasons:
 - to exercise the right of freedom of expression and information;
 - to comply with legal or regulatory obligations or for the performance of a public interest task or exercise of official authority;
 - for public health reasons in the public interest;
 - for archival, research or statistical purposes; or
 - to exercise or defend a legal claim.
- When complying with a valid request for the erasure of data we will take all reasonably practicable steps to [Delete](#) the relevant data.

Right to restrict processing:

- You have the right to request that we restrict our processing of your personal data in certain circumstances. This means that we can only continue to store your data and will not be able to carry out any further processing activities with it until either: (i) one of the circumstances listed below is resolved; (ii) you consent; or (iii) further processing is necessary for either the establishment, exercise or defence of legal claims, the protection of the rights of another individual, or reasons of important EU or Member State public interest.
- The circumstances in which you are entitled to request that we restrict the processing of your personal data are:

- Where you dispute the accuracy of the personal data that we are processing about you. In this case, our processing of your personal data will be restricted for the period during which the accuracy of the data is verified;
 - Where you object to our processing of your personal data for our legitimate interests. Here, you can request that the data be restricted while we verify our grounds for processing your personal data;
 - Where our processing of your data is unlawful, but you would prefer us to restrict our processing of it rather than erasing it; and
 - Where we have no further need to process your personal data but you require the data to establish, exercise, or defend legal claims.
- If we have shared your personal data with third parties, we will notify them about the restricted processing unless this is impossible or involves disproportionate effort. We will notify you before lifting any restriction on processing your personal data.

Right to rectification:

- You also have the right to request that we rectify any inaccurate or incomplete personal data that we hold about you. If we have shared this personal data with third parties, we will notify them about the rectification unless this is impossible or involves disproportionate effort. Where appropriate, we will also tell you which third parties we have disclosed the inaccurate or incomplete personal data to. Where we think that it is reasonable for us not to comply with your request, we will explain our reasons for this decision.

Right of data portability:

- If you wish, you have the right to transfer your personal data between data controllers. To allow you to do so, we will provide you with your data in a commonly used machine-readable format that is password-protected so that you can transfer the data to an online platform. Alternatively, we may directly transfer the data for you. This right of data portability applies to: (i) personal data that we process automatically (i.e. without any human intervention); (ii) personal data provided by you; and (iii) personal data that we process based on your consent or in order to fulfil a contract.

Right to lodge a complaint with a supervisory authority:

- You also have the right to lodge a complaint with your local supervisory authority. Details of how to contact them can be found [here](#).
- If you would like to exercise any of these rights, or withdraw your consent to the processing of your personal data (where consent is our legal basis for processing your personal data), details of how to contact us can be found [here](#). Please note that we may keep a record of your communications to help us resolve any issues that you raise.
- You may ask to unsubscribe from direct marketing at any time.
- It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during the period for which we hold your data.

9 WHO IS RESPONSIBLE FOR PROCESSING YOUR PERSONAL DATA?

You can find out which ECTP entity is responsible for processing your personal data and where it is located by following this [link](#).

If you have any comments or suggestions concerning this Privacy Policy, please follow this [link](#).

10 HOW DO WE STORE AND TRANSFER YOUR DATA INTERNATIONALLY?

In order to carry out the [purposes](#) described in this Privacy Policy, your data may be transferred:

- between and within entities within our group and affiliate companies
- to third parties (such as regulatory authorities, advisers or other suppliers to the business);
- to overseas End Users;
- to End Users within your country who may, in turn, transfer your data internationally;
- to a cloud-based storage provider; and
- to other third parties, as referred to [here](#).

We want to make sure that your data are stored and transferred in a way that is secure. We will therefore only transfer data outside of the European Economic Area or EEA (i.e. the Member States of the European Union, together with Norway, Iceland and Liechtenstein) where it is compliant with data protection legislation and the means of transfer provides adequate safeguards in relation to your data, for example:

- by way of data transfer agreement, incorporating the current standard contractual clauses adopted by the European Commission for the transfer of personal data by data controllers in the EEA to data controllers and processors in jurisdictions without adequate data protection laws; or
- by signing up to the EU-U.S. Privacy Shield Framework for the transfer of personal data from entities in the EU to entities in the United States of America or any equivalent agreement in respect of other jurisdictions; or
- transferring your data to a country where there has been a finding of adequacy by the European Commission in respect of that country's levels of data protection via its legislation; or
- where it is necessary for the conclusion or performance of a contract between ourselves and a third party and the transfer is in your interests for the purposes of that contract (for example, if we need to transfer data outside the EEA in order to meet our obligations under that contract if you are a customer of ours); or
- where you have consented to the data transfer.

To ensure that your personal information receives an adequate level of protection, we have put in place appropriate procedures with the third parties we share your personal data with to ensure that your personal information is treated by those third parties in a way that is consistent with the law on data protection.

11 COOKIES POLICY

What's a cookie?

- A "cookie" is a piece of information that is stored on your computer's hard drive and which records your navigation of a website so that, when you revisit that website, it can present tailored options based on the information stored about your last visit. Cookies can also be used to analyse traffic and for advertising and marketing purposes.
- Cookies are used by nearly all websites and do not harm your system. If you want to check or change what types of cookies you accept, this can usually be altered within your browser settings.

How do we use cookies?

- We use cookies to track your use of our website. This enables us to understand how you use the site and track any patterns that emerge individually or from larger groups. This helps us to develop and improve our website and services in response to what our visitors want and need.
- Cookies are either:
 - **Session cookies:** these are only stored on your computer during your web session and are automatically deleted when you close your browser – they usually store an anonymous session ID allowing you to browse a website without having to log in to each page but they do not collect any information from your computer; or
 - **Persistent cookies:** a persistent cookie is stored as a file on your computer and it remains there when you close your web browser. The cookie can be read by the website that created it when you visit that website again. We use persistent cookies for Google Analytics and for personalisation (see below).
- Cookies can also be categorised as follows:
 - **Strictly necessary cookies:** These cookies are essential to enable you to use the site effectively and therefore cannot be turned off. Without these cookies, the services available to you on our site cannot be provided. These cookies do not gather information about you that could be used for marketing or remembering where you have been on the internet.
 - **Performance cookies:** These cookies enable us to monitor and improve the performance of our site. For example, they allow us to count visits, identify traffic sources and see which parts of the site are most popular.
 - **Functionality cookies:** These cookies allow our website to remember choices you make (such as your language or the region you are in) and provide enhanced features. For instance, we may be able to provide you with news or updates relevant to the services you use. These cookies can also be used to remember changes you have made to text size, font and other parts of web pages that you can customise. They may also be used to provide services you have requested such as viewing a video or commenting on a blog. The information these cookies collect is usually anonymised.
 - **Personalisation cookies:** These cookies help us to advertise details of potential job opportunities that we think may be of interest. These cookies are persistent (for

as long as you are registered with us) and mean that when you log in or return to the website, you may see advertising for jobs that are similar to jobs that you have previously browsed.

12. OUR LEGAL BASES FOR PROCESSING YOUR DATA

LEGITIMATE INTERESTS

- Article 6(1)(f) of the GDPR says that we can process your data where it "*is necessary for the purposes of the legitimate interests pursued by [us] or by a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of [you] which require protection of personal data.*"
- You have the right to object to us processing your personal data on this basis. If you would like to know more about how to do so, please click [here](#).
- Please note that in certain of the jurisdictions in which we operate, a different legal basis for data processing might apply in certain cases. For more information, please click [here](#).

END USER DATA:

- To ensure that we provide you with the best service possible, we use and store your personal data and/or the personal data of individual contacts at your organisation as well as keeping records of our conversations, meetings, and communications. We deem these uses of your data to be necessary for our legitimate interests as an organisation trading in commodities.
- We have to make sure our business runs smoothly. We therefore also need to use your data for our internal administrative activities, such as invoicing where relevant.
- We may want to provide you with relevant information to read to which you have indicated your interest to us in writing or to which we reasonably believe you will be interested in and you have not opted out from receiving marketing information. We therefore think it is reasonable for us to process your data to make sure that we send you the most appropriate content.
- We have our own obligations under the law, which it is a legitimate interest of ours to insist on meeting. If we believe in good faith that it is necessary, we may therefore share your data in connection with crime detection or tax collection.

SUPPLIER DATA:

- We use and store the personal data of individuals within your organisation in order to facilitate the receipt of services from you as one of our [Suppliers](#). We also hold your financial details, so that we can pay you for your services.

We deem all such activities to be necessary within the range of our legitimate interests as a recipient of your services.

COUNTERPARTIES:

- To ensure that we provide you with the best service possible, we use and store your personal data and/or the personal data of individual contacts at your organisation as well as keeping records of our conversations, meetings, and other communications.
- We want to provide you with relevant information to read to which you have indicated your interest to us in writing or to which we reasonably believe you will be interested in and you have not opted out from receiving marketing information. We therefore think it's reasonable for us to process your data to make sure that we send you the most appropriate content.
- We think this is reasonable – we deem these uses of your data to be necessary for our legitimate interests as an organisation providing services to you.
- We have to make sure our business runs smoothly, so that we can carry on providing services. We therefore also need to use your data for our internal administrative activities.
- We have our own obligations under the law, which it is a legitimate interest of ours to insist on meeting. If we believe in good faith that it is necessary, we may therefore share your data in connection with crime detection or tax collection.

COMMODITIES PRODUCERS:

- We use and store the personal data of individuals connected with your organisations in order to facilitate the buying and selling of commodities, futures and options.
- We deem such activities necessary within the range of our legitimate interests as an organisation.

JOB APPLICANT DATA:

- We think it's reasonable to expect that if you are looking for employment or have provided your CV or application form you are happy for us to collect and otherwise use your personal data to engage in a recruitment exercise, consider whether to offer employment to you and double check any information you've given us (such as the results from psychometric evaluations or skills tests) or to confirm your references, qualifications and criminal record, to the extent that this is appropriate and in accordance with local laws. We need to do these things so that we can carry out and appoint the best applicants to join ECTP.

PEOPLE WHOSE DATA WE RECEIVE FROM JOB APPLICANTS AND STAFF, SUCH AS REFEREES AND EMERGENCY CONTACTS:

- If you have been put down by a [Job applicant](#) or a member of [Staff](#) as one of their referees, we use your personal data in order to contact you for a reference. This is to be necessary for our legitimate interests as an organisation to ensure we appoint the best applicants to join ECTP.
- If a [Staff](#) member has given us your details as an emergency contact, we will use these details to contact you in the case of an accident or emergency. We have a legitimate interest to store this data and use it in appropriate circumstances on behalf of our [Staff](#).
- If a [Staff](#) member has given us your details as a dependent or a next of kin, we will use your personal data as appropriate for the purpose of benefits (e.g. death in service, privacy medical insurance or childcare funding) or employment rights (e.g. maternity or paternity).

leave or a flexible working request). We have a legitimate interest to store this data and use it in appropriate circumstances on behalf of our [Staff](#).

CONSENT

In certain circumstances, we are required to obtain your consent to the processing of your personal data in relation to certain activities. Depending on exactly what we are doing with your information, this consent will be opt-in consent or soft opt-in consent.

Article 4(11) of the GDPR states that (opt-in) consent is "*any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.*" In plain language, this means that:

- you have to give us your consent freely, without us putting you under any type of pressure;
- you have to know what you are consenting to – so we'll make sure we give you enough information;
- you should have control over which processing activities you consent to and which you don't. We provide these finer controls within our privacy preference centre; and
- you need to take positive and affirmative action in giving us your consent – for example, we may provide a tick box for you to check so to meet this requirement in a clear and unambiguous fashion.
- we will keep records of the consents that you have given in this way.

In some cases, we will be able to rely on soft opt-in consent. For example, we can offer products or services to you that relate to the services we provide as long as you do not actively opt-out from these communications

As we have mentioned, you have the right to withdraw your consent to these activities. You can do so at any time, and details of how to do so can be found [here](#).

LEGAL OBLIGATIONS

We also have legal and regulatory obligations with which we need to comply. . Article (6)(1)(c) of the GDPR states that we can process your personal data where this processing "*is necessary for compliance with a legal obligation to which [we] are subject*".

If we believe in good faith that it is necessary, we may share your data in connection with crime detection or tax collection.

We also may share your data with regulatory agencies or other relevant bodies in order to comply with our regulatory obligations.

We will keep records of your personal data (including personal data contained in communications and calls) in accordance with our legal and regulatory obligations.

TO EXERCISE OUR RIGHTS OR CARRY OUT OUR EMPLOYMENT AND SOCIAL SECURITY LAW OBLIGATIONS

For [Job Applicants](#) and those whose personal data is provided by [Job Applicants](#) and [Staff](#), sometimes it will be necessary for us to process your [Sensitive Personal Data](#), for example during the course of the recruitment process. Article 9(2)(b) of the [GDPR](#) allows us to do this where the processing is "*necessary for the purposes of carrying out the obligations and exercising [our or your] specific rights... in the field of employment and social security and*

social protection law", as long as this is allowed by law.

We process your [Sensitive Personal Data](#) for the purpose of ensuring our compliance with our equal opportunities obligations where this in accordance with local law, but we may also process other elements of your [Sensitive Personal Data](#) for other reasons as appropriate, for example to allow the relevant [Staff](#) member to access certain benefits or employment rights. You can find out how we process your [Sensitive Personal Data here](#).

For [Job Applicants](#), where appropriate and in accordance with any local laws and requirements, we may also process your medical data to enable us to provide you with adequate support if you suffer from a health condition or disability, in order to determine any reasonable adjustments to interview or other arrangements.

ESTABLISHING, EXERCISING OR DEFENDING LEGAL CLAIMS

Sometimes it may be necessary for us to process personal data and, where appropriate and in accordance with local laws and requirements, sensitive personal data in connection with exercising or defending legal claims. Article 9(2)(f) of the GDPR allows this where the processing "*is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity*".

This may arise for example where we need to take legal advice in relation to legal proceedings or are required by law to preserve or disclose certain information as part of the legal process.



ANNEX 1 – HOW TO CONTACT US

| Country in which you use ECTP services or supply ECTP with services | <i>ECTP entity responsible for processing your personal data</i> | Other ECTP entities that may process your personal data | <p>How you can get in touch with us:</p> <ul style="list-style-type: none"> • to access, amend or take back the personal data that you have given to us; • if you suspect any misuse or loss of or unauthorised access to your personal information; • to withdraw your consent to the processing of your personal data (where consent is the legal basis on which we process your personal data); • with any comments or suggestions concerning this Staff Privacy Policy |
|---|--|---|---|
| UK | <i>Engelhart CTP Holding (UK) Limited and its subsidiaries</i> | <p><i>Engelhart CTP Group SA</i></p> <p><i>Engelhart CTP Group (UK) Limited</i></p> | <p>You can write to us at the following address:</p> <p>Berkeley Square House, 3rd Floor, 4-19 Berkeley Square, London, W1J 6BR</p> <p>Alternatively, you can send an email to:</p> <p><i>OL-ECTP-Dataprotection@ectp.com</i></p> |



ANNEX 2 – HOW TO CONTACT YOUR LOCAL SUPERVISORY AUTHORITY

| Country in which you use ECTP services or supply ECTP with services | Details of your local supervisory authority |
|--|---|
| UK | <p>The Information Commissioner's Office. You can contact them in the following ways:</p> <ul style="list-style-type: none">• Phone: 0303 123 1113• Email: casework@ico.org.uk• Live chat.• Post: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF |
| Luxembourg | <p>The National Commission for Data Protection (<i>Commission nationale pour la protection des données</i>). You can contact them in the following ways:</p> <ul style="list-style-type: none">• Phone: (+352) 26 10 60-1• Online form• Post: Commission nationale pour la protection des données Service des plaintes 1, avenue du Rock'n'Roll L-4361 Esch-sur-Alzette |
| The Netherlands | <p>The Dutch Data Protection Authority (<i>Autoriteit Persoonsgegevens</i>). You can contact them in the following ways:</p> <ul style="list-style-type: none">• Phone: (+31) – (0)70 – 888 85 00 |

| | |
|--------------------|--|
| | <ul style="list-style-type: none">• Post: Autoriteit Persoonsgegevens Postbus 93374 2509 AJ DEN HAAG |
| Switzerland | <p>The Federal Data Protection and Information Commissioner (Préposé fédéral à la protection des données et à la transparence). You can contact them in the following ways:</p> <ul style="list-style-type: none">• Phone: +41 (0)58 462 43 95• Email: info@edoeb.admin.ch• Post: Office of the Federal Data Protection and Information Commissioner FDPIC Feldeggweg 1 CH - 3003 Berne |



GLOSSARY

- **Affiliates** - means any person directly or indirectly controlled by, or controlling of, or under the common control with, the Company, which shall be deemed to include, for the avoidance of doubt, the Company's current corporate member, BTG GAM (UK) Limited, and/or any replacement corporate member of the Company and/or any of its or their respective Subsidiaries or Associates.
- **Associate** - means a body corporate:
 - which for the time being is a Parent Undertaking of the Company or a Subsidiary of the Company or of such a Parent Undertaking; or
 - in whose Equity Share Capital for the time being an interest of 20 per cent or more is held directly or indirectly (through another body corporate or other bodies corporate or otherwise) by a Parent Undertaking of the Company or by a Subsidiary (including the Company) of such a Parent Undertaking or by a combination of two or more such Parent Undertakings or Subsidiaries.
- **End Users** – this category covers buyers and end user clients with whom ECTP trades physical commodities.
- **Delete** – Once personal data reaches the end of its nominal retention period, or where ECTP receives a valid request to erase it, ECTP will put in place specific operational and systems measures to ensure that the personal data is "put beyond use". While the data will still technically exist on an archive system, ECTP will ensure that it cannot be accessed by any of our operational systems, processes or [Staff](#). Only a very small number of senior [Staff](#), in very limited and carefully prescribed situations, will be able to restore this personal data so that it can be viewed for those legitimate purposes. Once all relevant legally mandated retention periods have expired, ECTP will undertake to carry out a "hard delete", so that not even a very limited number of senior [Staff](#) would be able to restore the personal data.
- **General Data Protection Regulation (GDPR)** – a European Union statutory instrument which aims to harmonise European data protection laws. It has an effective date of 25 May 2018, and any references to it should be construed accordingly to include any national legislation implementing it.
- **Commodities Producers** – includes business contacts and other staff of corporate companies who produce commodities in markets managed by ECTP (e.g. timberland and agriculture), sole traders, and any other individual whose personal data may be processed as a result of ECTP's contact with such companies, co-operatives or sole traders.
- **Counterparties**– includes individual and institutional traders, brokers, investment managers, agents, representatives etc. from counterparties with whom ECTP trades in futures and options.
- **Job Applicants** - includes applicants for all roles advertised or promoted by ECTP, including permanent, part-time and temporary positions [and freelance roles] ECTP as well as people who have supplied a speculative CV to ECTP not in relation to a specific job.

- **Other people whose personal data we may process** – these may include ECTP [Staff](#) emergency contacts and next of kin, referees and dependents for the purpose of benefits (e.g. privacy medical insurance or childcare funding). It also includes referees provided by Job Applicants)
- **Sensitive Personal Data** – this is personal data consisting of information such as your racial or ethnic origin, your political opinions or religious beliefs, whether you are a trade union member, your physical and mental health, your genetic and biometric data, data relating to your sex life and sexual orientation, and whether you have or are alleged to have committed a criminal offence. Due to the nature of sensitive personal data, data protection legislation is much stricter about how such data should be held and processed. We will only process your sensitive personal data where appropriate and in accordance with local law requirements.
- **Staff** – includes current and former employees and interns engaged directly in the business of ECTP (or who have accepted an offer to be engaged) as well as other workers currently or previously engaged in the business of providing services to ECTP (even though they are not classed as employees). Independent contractors and consultants performing services for ECTP also fall within the definition of a Staff for the purposes of this Privacy Policy.
- **Subsidiary** - means Subsidiary Undertaking, and "Subsidiary Undertaking", "Parent Undertaking" and "Equity Share Capital" shall have the respective meanings attributed to them by sections 1162 and 548 of the Companies Act 2006.
- **Suppliers** – refers to partnerships, companies (including sole traders), third party service providers (including administrators and distributors), introducer agents and atypical workers such as independent contractors and freelance workers, who provide services to ECTP. For the purposes of this Policy, regulatory agencies and external bodies will be treated as suppliers.
- **Website Users** - any individual who accesses any of the ECTP website(s)