

1. Introduction

This Policy sets out the obligations of Learn to Trade Limited (referred to as “LTT” or “the Company”) regarding data protection and the rights of current, past and prospective staff, suppliers, clients, customers, and others with whom it has business or with whom it communicates (“data subjects”) in respect of their personal data in accordance with UK data protection law which includes but may not be limited to the UK General Data Protection Regulation (“UK GDPR”), the Privacy and Electronic Communications Regulation (PECR) and the data Protection Act 2018 (DPA) (hereafter referred to as UK data protection law). Other legislation may be applicable according to the jurisdiction in which an individual for whom we may process personal data may reside.

UK data protection law defines “personal data” as any information relating to an identified or identifiable natural person (a data subject); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, name, email address, telephone number, postal address, IP address etc, and credit card numbers.

This Policy sets out the procedures that are to be followed when dealing with personal data. The procedures and principles set out herein must be followed at all times by LTT, its employees, agents, contractors, or other parties working on behalf of the Company.

LTT is committed to ensuring that it treats personal information lawfully and places high importance on the correct, lawful, and fair handling of all personal data, respecting the legal rights, privacy, and trust of all individuals with whom it deals.

2. The Data Protection Principles

This Policy aims to ensure compliance with the Regulation. The Regulation sets out the following principles with which any party handling personal data must comply. All personal data must be:

- a) processed lawfully, fairly, and in a transparent manner in relation to the data subject;

- b) collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be incompatible with the initial purposes;
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed;
- d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which they are processed, is erased or rectified without delay;
- e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the Regulation in order to safeguard the rights and freedoms of the data subject;
- f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.
- g) Demonstrably accounted for with accurate records of all processing activities, please refer to section 9 of this policy.

3. **Lawful, Fair, and Transparent Data Processing**

The Regulation seeks to ensure that personal data is processed lawfully, fairly, and transparently, without adversely affecting the rights of the data subject. The Regulation states that processing of personal data shall be lawful if at least one of the following applies:

- a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes;

- b) processing is necessary for the performance of a contract to which the data subject is a party or to take steps at the request of the data subject prior to entering into a contract;
- c) processing is necessary for compliance with a legal obligation to which the controller is subject;
- d) processing is necessary to protect the vital interests of the data subject or of another natural person;
- e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- f) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the fundamental rights and freedoms of the data subject which require protection of personal data, where the data subject is a child.
- g) LTT will initially process the personal data of potential and actual customers using their consent (a). Once a prospective customer becomes an actual customer the lawful basis will be contractual obligation (b). For the avoidance of doubt, this condition provides for the sharing of the data with other companies details of which are included in the terms of the contract.

4. Processed for Specified, Explicit and Legitimate Purposes

To conduct its normal business, LTT collects and uses certain types of personal information about living individuals. This personal data will be processed according to the legal basis of consent, contractual relationships

with data subjects, compliance with regulated activities in which LTT is engaged and for the purposes of legitimate interests pursued by LTT , for example processing data to help improve the Company's products and services.

In particular:-

4.1 LTT collects and processes the personal data set out in Appendix C of this Policy. This may include personal data received directly from data subjects (for example, contact details used when a data subject communicates with us) and data received from third parties.

4.2 LTT only processes personal data for the specific purposes set out in Appendix A of this Policy (or for other purposes expressly permitted by the Regulation). The purposes for which we process personal data will be informed to data subjects at the time that their personal data is collected, where it is collected directly from them, or as soon as possible (not more than one calendar month) after collection where it is obtained from a third party.

5. Adequate, Relevant and Limited Data Processing

LTT will only collect and process personal data for and to the extent necessary for the specific purpose(s) informed to data subjects as under Part 4, above.

6. Accuracy of Data and Keeping Data Up to Date

LTT shall ensure that all personal data collected and processed is kept accurate and up-to-date. The accuracy of data shall be checked when it is collected and at regular intervals thereafter. Where any inaccurate or out-of-date data is found, all reasonable steps will be taken without delay to amend or erase that data, as appropriate.

7. Timely Processing

LTT shall not keep personal data for any longer than is necessary in light of the purposes for which that data was originally collected and processed. When the data is no longer required, all reasonable steps will be taken to erase it without delay. LTT's data retention policy is located at Appendix

8. **Secure Processing**

LTT shall ensure that all personal data collected and processed is kept secure and protected against unauthorised or unlawful processing and against accidental loss, destruction or damage. Further details of the data protection and organisational measures which shall be taken are provided in Parts 22 and 23 of this Policy.

9. **Accountability**

9.1 LTT, as Data Controller provides a structure that acknowledges the responsibilities and accountability for data protection. This is detailed in Appendix B.

9.2 LTT keeps internal records of all personal data collection, holding, and processing, which incorporate the following information:

- a) LTT's name and details, responsible person(s) for data protection (see Appendix B), and any applicable third-party data processors (see Appendix D);
- b) The purposes for which LTT processes personal data (see Appendix A);
- c) Details of the categories of personal data collected, held, and processed by the Company; and the categories of data subject to which that personal data relates; (See Appendix C)
- d) Details (and categories) of any third parties that will receive personal data from LTT; (See Appendix C)
- e) Details of any transfers of personal data to non-EEA countries including all mechanisms and security safeguards;
- f) Details of how long personal data will be retained by LTT (see Appendix E); and
- g) Detailed descriptions of all technical and organisational measures taken by LTT to ensure the security of personal data (refer to the IT Security Policy).

10. **Privacy Impact Assessments (DPIAs)**

LTT shall carry out Privacy Impact Assessments when and as required under the Regulation. The provision of a Privacy Impact Assessment shall be overseen by LTT's Compliance Team and shall address the following areas of importance:

10.1 The purpose(s) for which personal data is being processed and the processing operations to be carried out on that data;

10.2 Details of the legitimate interests being pursued by LTT;

10.3 An assessment of the necessity and proportionality of the data processing with respect to the purpose(s) for which it is being processed;

10.4 An assessment of the risks posed to individual data subjects; and

10.5 Details of the measures in place to minimise and handle risks including safeguards, data security, and other measures and mechanisms to ensure the protection of personal data, sufficient to demonstrate compliance with the Regulation.

11. **The Rights of Data Subjects**

The Regulation sets out the following rights applicable to data subjects:

- a) The right to be informed;
- b) The right of access;
- c) The right to rectification;
- d) The right to erasure (also known as the 'right to be forgotten');
- e) The right to restrict processing;
- f) The right to data portability;
- g) The right to object;
- h) Rights with respect to automated decision-making and profiling.

Attached at Appendix F is the process for a data subject to follow to exercise one of it's rights in respect of 11 a) – h).

12. Keeping Data Subjects Informed

12.1 LTT shall ensure that the following information is provided - by reference to this Data Protection Policy - to every data subject when personal data is collected:

- a) Details of LTT including, but not limited to, the identity of any appointed Data Protection Officer;
- b) The purpose(s) for which the personal data is being collected and will be processed (as detailed in Appendix A of this Policy) and the legal basis justifying that collection and processing;
- c) Where applicable, the legitimate interests upon which LTT is justifying its collection and processing of the personal data;
- d) Where the personal data is not obtained directly from the data subject, the categories of personal data collected and processed;
- e) Where the personal data is to be transferred to one or more third parties, details of those parties;
- f) Where the personal data is to be transferred to a third party that is located outside of the European Economic Area (the "EEA") or any other country which the UK or the EU do not consider adequate, details of that transfer, including but not limited to the safeguards in place (see Part 21 of this Policy for further details concerning such third country data transfers);
- g) Details of the length of time the personal data will be held by LTT (or, where there is no predetermined period, details of how that length of time will be determined);
- h) Details of the data subject's rights under the Regulation;
- i) Details of the data subject's right to withdraw their consent to LTT's processing of their personal data at any time;

j) Details of the data subject's right to complain to the Information Commissioner's Office (the 'supervisory authority' under the Regulation);

k) Where applicable, details of any legal or contractual requirement or obligation necessitating the collection and processing of the personal data and details of any consequences of failing to provide it;

l) Details of any automated decision-making that will take place using the personal data (including but not limited to profiling), including information on how decisions will be made, the significance of those decisions and any consequences.

12.2 The information set out above in Part 12.1 shall be provided to the data subject at the following applicable time:

12.2.1 Where the personal data is obtained from the data subject directly, at the time of collection;

12.2.2 Where the personal data is not obtained from the data subject directly (i.e. from another party):

a) If the personal data is used to communicate with the data subject, at the time of the first communication; or

b) If the personal data is to be disclosed to another party, before the personal data is disclosed; or

c) In any event, not more than one month after the time at which LTT obtains the personal data.

13. **Data Subject Access**

13.1 A data subject may make a subject access request ("SAR") at any time to find out more about the personal data which LTT holds about them. LTT is normally required to respond to SARs within one month of receipt (this can be extended by up to two months in the case of complex and/or numerous requests, and in such cases the data subject shall be informed of the need for the extension).

13.2 All subject access requests received must be forwarded to the name of your Data Protection officer.

13.3 LTT will not charge a fee for the handling of normal SARs. LTT reserves the right to charge reasonable fees for additional copies of information that has already been supplied to a data subject, and for requests that are manifestly unfounded or excessive, particularly where such requests are repetitive.

13.4 All SARs will be handled in accordance with the guidance of the ICO.

14. Rectification of Personal Data

14.1 If a data subject informs LTT that personal data held by LTT is inaccurate or incomplete, requesting that it be rectified, the personal data in question shall be rectified, and the data subject informed of that rectification, within one month of receipt the data subject's notice (this can be extended by up to two months in the case of complex requests, and in such cases the data subject shall be informed of the need for the extension).

14.2 In the event that any affected personal data has been disclosed to third parties, those parties shall be informed of any rectification of that personal data.

15. Erasure of Personal Data

15.1 Data subjects may request that LTT erases the personal data it holds about them in the following circumstances:

- a) It is no longer necessary for LTT to hold that personal data with respect to the purpose for which it was originally collected or processed;
- b) The data subject wishes to withdraw their consent to LTT holding and processing their personal data;
- c) The data subject objects to LTT holding and processing their personal data (and there is no overriding legitimate interest to allow LTT to

continue doing so) (see Part 18 of this Policy for further details concerning data subjects' rights to object);

- d) The personal data has been processed unlawfully;
- e) The personal data needs to be erased for LTT to comply with a legal obligation

15.2 Unless LTT has reasonable grounds to refuse to erase personal data, all requests for erasure shall be complied with, and the data subject informed of the erasure, within one month of receipt of the data subject's request (this can be extended by up to two months in the case of complex requests, and in such cases the data subject shall be informed of the need for the extension).

15.3 In the event that any personal data that is to be erased in response to a data subject request has been disclosed to third parties, those parties shall be informed of the erasure (unless it is impossible or would require disproportionate effort to do so).

16. **Restriction of Personal Data Processing**

16.1 Data subjects may request that LTT ceases processing the personal data it holds about them. If a data subject makes such a request, LTT shall retain only the amount of personal data pertaining to that data subject that is necessary to ensure that no further processing of their personal data takes place.

16.2 In the event that any affected personal data has been disclosed to third parties, those parties shall be informed of the applicable restrictions on processing it (unless it is impossible or would require disproportionate effort to do so).

17. **Data Portability**

17.1 LTT processes personal data using automated means to ensure compliance with environmental legislation.

17.2 Where data subjects have given their consent to LTT to process their personal data in such a manner or the processing is otherwise required for

the performance of a contract between LTT and the data subject, data subjects have the legal right under the Regulation to receive a copy of their personal data and to use it for other purposes (namely transmitting it to other data controllers, e.g. other organisations).

17.3 To facilitate the right of data portability, LTT shall make available all applicable personal data to data subjects in one of the following formats:

- a) CSV files;
- b) PDF files
- c) Other multimedia, electronic (soft) or hard copy files.

17.4 Where technically feasible, if requested by a data subject, personal data shall be sent directly to another data controller.

17.5 All requests for copies of personal data shall be complied with within one month of the data subject's request (this can be extended by up to two months in the case of complex requests in the case of complex or numerous requests, and in such cases the data subject shall be informed of the need for the extension).

18. Objections to Personal Data Processing

18.1 Data subjects have the right to object to LTT processing their personal data based on legitimate interests (including profiling), direct marketing (including profiling), and processing for historical research and statistics purposes.

18.2 Where a data subject objects to LTT processing their personal data based on its legitimate interests, LTT shall cease such processing forthwith, unless it can be demonstrated that LTT's legitimate grounds for such processing override the data subject's interests, rights and freedoms; or the processing is necessary for the conduct of legal claims.

18.3 Where a data subject objects to LTT processing their personal data for direct marketing purposes, LTT shall cease such processing forthwith.

18.4 Where a data subject objects to LTT processing their personal data for historical research and statistics purposes, the data subject must, under the Regulation, 'demonstrate grounds relating to his or her particular situation'. LTT is not required to comply if the research is necessary for the performance of a task carried out for reasons of public interest.

19. Automated Decision-Making

19.1 In the event that LTT uses personal data for the purposes of automated decision-making and those decisions have a legal (or similarly significant effect) on data subjects, data subjects have the right to challenge to such decisions under the Regulation, requesting human intervention, expressing their own point of view, and obtaining an explanation of the decision from LTT.

20. Profiling

Where LTT uses personal data for profiling purposes, the following shall apply:

- a) Clear information explaining the profiling will be provided, including its significance and the likely consequences;
- b) Appropriate mathematical or statistical procedures will be used;
- c) Technical and organizational measures necessary to minimise the risk of errors and to enable such errors to be easily corrected shall be implemented; and
- d) All personal data processed for profiling purposes shall be secured in order to prevent discriminatory effects arising out of profiling (see Parts 22 and 23 of this Policy for more details on data security).

21. International Transfer of Data

21.1 LTT may transfer personal data to countries who are not signatory to the GDPR for the following reasons:

- a) To provide the data subject by telephone and e-mail with details of LTT's events, products and services which is facilitated by Learn to Trade Smart Charts Consulting Inc (LTT SC Inc), a Company registered in the Philippines.
- b) LTT has entered into an agreement with LTT SC PHL to ensure LTT SC PHL upholds LTT's data protection and data privacy policies.
- c) LTT's Compliance Team will regularly hold training with LTT SC Inc to ensure the compliance with the relevant legislation:

21.2 Where data is shared with or is accessible from a third country, LTT will adhere to its obligation regarding the UK data transfer regime. This includes but may not be limited to undertaking a transfer risk assessment. LTT will ensure that a UK safeguard is in force in such circumstances. These include using the UK addendum in combination with the EU standard contractual clauses (SCCs) or the UK international data transfer agreement (IDTA).

21.3 The Philippines legislation, the Data privacy Act of 2012 (Republic Act No. 10173) requires a suitable data sharing agreement between group companies for the purpose of inter-group transfers. Such an agreement should include details relating to: –

- a) purposes of the data sharing and the appropriate lawful basis
- b) objectives that the data sharing is meant to achieve
- c) identify all controllers that are a party to the data sharing agreement, and for each party, the agreement should specify:
- d) the types of personal data it will share
- e) whether the personal data processing will be outsourced, and if so, the types of processing the processor will be allowed to perform
- f) the method to be used for processing; and
- g) the designated data protection officer ('DPO')
- h) term and duration of the data sharing arrangement

- i) operational details of the data sharing, including the procedure the parties intend to observe in implementing the arrangement
- j) description of the reasonable and appropriate organisational, physical and technical security measures that the parties intend to adopt
- k) process for data breach management
- l) mechanisms that allow the data subjects to exercise their rights relative to their personal data, including:
 - m) identity of the party or parties responsible for addressing information requests, complaints by the data subject, and/or any investigation by the NPC; and
 - n) procedure by which a data subject can access or obtain a copy of the data sharing agreement; and
 - o) rules for retention of the shared data, and the method that will be adopted for the secure return, destruction, or disposal of the shared data and the timeline.

21.4 Where the recipient is authorised to disclose the shared data or grant public access to the same, the data sharing agreement must clearly establish this, including the justification for allowing such public access, the parties to whom access is granted, the types of personal data made accessible, and the frequency and volume of such access.

Furthermore, if the disclosure or further access is facilitated by an online platform, the program, middleware, and encryption method that will be used should also be identified in the data sharing agreement. The controllers' respective DPOs must sign as witnesses to the data sharing agreement. Furthermore, NPC Circular 20-03 also requires controllers to establish and maintain a record of its data sharing arrangements, including, among other things, contact details of all parties and their respective DPOs, legal bases for the data sharing arrangements, and, where applicable, proof of consent obtained from data subjects.

22. Data Protection Measures

LTT shall ensure that all its employees, agents, contractors, or other parties working on its behalf comply with the following when working with personal data:

- a) All emails containing personal data must be encrypted;
- b) Where any personal data is to be erased or otherwise disposed of for any reason (including where copies have been made and are no longer needed), it should be securely deleted and disposed of. Hardcopies should be shredded.
- c) Personal data may be transmitted over secure networks only; transmission over unsecured networks is not permitted in any circumstances;
- d) Personal data may not be transmitted over a wireless network if there is a wired alternative that is reasonably practicable;
- e) Personal data contained in the body of an email, whether sent or received, should be copied from the body of that email and stored securely. The email itself should be deleted. All temporary files associated therewith should also be deleted;
- f) Where Personal data is to be sent by facsimile transmission the recipient should be informed in advance of the transmission and should be waiting by the fax machine to receive the data;
- g) Where Personal data is to be transferred in hardcopy form it should be passed directly to the recipient or sent using Royal Mail or an equivalent postal service;
- h) No personal data may be shared informally and if an employee, agent, sub-contractor, or other party working on behalf of LTT requires access to any personal data that they do not already have access to, such access should be formally requested from the DPCO.
- i) All hardcopies of personal data, along with any electronic copies stored on physical, removable media should be stored securely in a locked box, drawer, cabinet or similar;

- j) No personal data may be transferred to any employees, agents, contractors, or other parties, whether such parties are working on behalf of the Company or not, without the authorisation of the DPCO.
- k) Personal data must be handled with care at all times and should not be left unattended or on view to unauthorised employees, volunteers, agents, sub-contractors or other parties at any time;
- l) If personal data is being viewed on a computer screen and the computer in question is to be left unattended for any period of time, the user must lock the computer and screen before leaving it;
- m) No personal data should be stored on any mobile device (including, but not limited to, laptops, tablets and smartphones), whether such device belongs to LTT or otherwise without formal written approval and, in the event of such approval, strictly in accordance with all instructions and limitations described at the time the approval is given, and for no longer than is absolutely necessary.
- n) No personal data should be transferred to any device personally belonging to an employee and personal data may only be transferred to devices belonging to agents, volunteers, contractors, or other parties working on behalf of LTT where the party in question has agreed to comply fully with the letter and spirit of this Policy and of the Regulation (which may include demonstrating to LTT that all suitable technical and organisational measures have been taken);
- o) All personal data stored electronically should be encrypted and backed up weekly with back-ups stored offsite.
- p) All electronic copies of personal data should be stored securely using passwords and data encryption;
- q) All passwords used to protect personal data should be changed regularly and should not use words or phrases that can be easily guessed or otherwise compromised. All passwords must contain a combination of uppercase and lowercase letters, numbers, and symbols;

r) Under no circumstances should any passwords be written down or shared between any employees, volunteers, agents, contractors, or other parties working on

behalf of LTT, irrespective of seniority or department. If a password is forgotten, it must be reset using the applicable method. IT staff do not have access to passwords;

s) Where personal data held by LTT is used for marketing purposes, it shall be the responsibility of the Head of Marketing, to ensure that no data subjects have added their details to any marketing preference databases including, but not limited to, the Telephone Preference Service, the Mail Preference Service, the Email Preference Service, and the Fax Preference Service. Such details should be checked at least annually.

23. Organisational Measures

LTT shall ensure that the following measures are taken with respect to the collection, holding, and processing of personal data:

a) All employees, volunteers, agents, contractors, or other parties working on behalf of LTT shall be made fully aware of both their individual responsibilities and LTT's responsibilities under the Regulation and under this Policy, and shall be provided with a copy of this Policy;

b) Only employees, agents, sub-contractors, or other parties working on behalf of LTT that need access to, and use of, personal data in order to carry out their assigned duties correctly shall have access to personal data held by LTT;

c) All employees, volunteers, agents, contractors, or other parties working on behalf of LTT handling personal data will be appropriately trained to do so;

d) All employees, volunteers, agents, contractors, or other parties working on behalf of LTT handling personal data will be appropriately supervised;

e) Methods of collecting, holding and processing personal data shall be regularly evaluated and reviewed;

- f) The performance of those employees, volunteers, agents, contractors, or other parties working on behalf of LTT handling personal data shall be regularly evaluated and reviewed;
- g) All employees, volunteers, agents, contractors, or other parties working on behalf of LTT handling personal data will be bound to do so in accordance with the principles of the Regulation and this Policy by contract;
- h) All agents, contractors, or other parties working on behalf of LTT handling personal data must ensure that any and all of their employees who are involved in the processing of personal data are held to the same conditions as those relevant employees of LTT arising out of this Policy and the Regulation;
- i) Where any agent, contractor or other party working on behalf of LTT handling personal data fails in their obligations under this Policy that party shall indemnify and hold harmless LTT against any costs, liability, damages, loss, claims or proceedings which may arise out of that failure.

24. Data Breach Notification

24.1 All personal data breaches must be reported immediately to LTT by e-mail to data@learntotrade.co.uk.

24.2 If a personal data breach occurs and that breach is likely to result in a risk to the rights and freedoms of data subjects (e.g. financial loss, breach of confidentiality discrimination, reputational damage, or other significant social or economic damage), the data protection officer must ensure that the Information Commissioner's Office is informed of the breach without delay and in any event within 72 hours after having become aware of the breach.

24.3 In the event that a personal data breach is likely to result in a high risk (that is, a higher risk than that described under Part 24.2) to the rights and freedoms of data subjects, the data protection officer must ensure that all affected data subjects are informed of the breach directly and without undue delay.

24.4 Data breach notifications shall include the following information:

- a) The categories and approximate number of data subjects concerned;
- b) The categories and approximate number of personal data records concerned;
- c) The name and contact details of LTT's data protection officer (or other contact point where more information can be obtained);
- d) The likely consequences of the breach;
- e) Details of the measures taken, or proposed to be taken, by LTT to address the breach including, where appropriate, measures to mitigate its possible adverse effects.

25. General Training

LTT is responsible for ensuring that all of its employees, volunteers, associates, interns and contractors are aware of their personal responsibilities in relation to personal data, ensuring that it is properly protected at all times and is processed only in line with LTT's procedures.

To this end, LTT shall ensure that all of its employees are given appropriate and relevant training.

26. Implementation of Policy

This Policy was updated on 10th January 2023 and is reviewed annually.

APPENDIX A

1. LTT is a financial trading education company founded in 2003, which provides educational products and services to the public. LTT provides education in foreign exchange trading and also stocks, indices and commodities.. As LTT;

- a) Markets and offers to the general public free promotional events that provide information on education products and services. LTT's marketing activities collect data by way of implied consent to which all data subjects are asked to agree to and have the option to change their preferences at any time;

APPENDIX B – LTT data protection responsibilities

LTT will maintain a team with management oversight and responsibility for operational processes and maintenance of data protection policies and activities. The team will be made up of:-

Chief Executive Officer, with oversight of application of the regulation.

Head of Digital Marketing with responsibility for oversight of marketing activities with regard to compliance with the Regulation.

IT Manager with responsibility for Data compliance for all LTT systems, data stores and maintaining secure systems and processes through IT security policies

APPENDIX C - PERSONAL DATA

The following data may be collected, held and processed by LTT:

TYPE OF DATA	LAWFUL REASON FOR PROCESSING	PROSPECTIVE CUSTOMER	CUSTOMER	STAFF
FIRST NAME	CONSENT OR CONTRACTUAL	Y	Y	Y
LAST NAME	CONSENT OR CONTRACTUAL	Y	Y	Y
E-MAIL ADDRESS	CONSENT OR CONTRACTUAL	Y	Y	Y
TELEPHONE NUMBER	CONSENT OR CONTRACTUAL	Y	Y	Y

MOBILE NUMBER	CONSENT OR CONTRACTUAL	Y	Y	Y
IP ADDRESS	CONSENT	Y	Y	Y
DATE OF BIRTH	CONSENT OR LEGAL OBLIGATION	N	Y	Y
POSTAL ADDRESS	CONSENT OR CONTRACTUAL	N	Y	Y
GENDER	CONSENT	N	Y	Y
EDUCATION LEVEL	CONSENT	N	N	Y
EMPLOYMENT STATUS	COMPLIANCE WITH LEGAL OBLIGATION	N	N	Y
ANNUAL INCOME	COMPLIANCE WITH LEGAL OBLIGATION	N	N	Y
CREDIT /DEBIT CARD	CONTRACTUAL	N	Y	N
BANK ACCOUNT DETAILS	CONTRACTUAL	N	Y	Y
NATIONAL INSURANCE NUMBER	CONTRACTUAL	N	N	Y
NATIONALITY	CONTRACTUAL	N	N	Y
NEXT OF KIN	COMPLIANCE WITH LEGAL OBLIGATION	N	N	Y

DATA LTT SHARES WITH SMART CHARTS

DATA TYPE	LAWFUL REASON FOR PROCESSING	PROSPECTIVE CUSTOMER
NAME	CONTRACTUAL / LEGITIMATE INTEREST	Y
EMAIL ADDRESS	CONTRACTUAL / LEGITIMATE INTEREST	Y
TELEPHONE	CONTRACTUAL / LEGITIMATE INTEREST	Y
ADDRESS	CONTRACTUAL / LEGITIMATE INTEREST	Y

DATA LTT SHARES WITH CAPITAL INDEX

DATA TYPE	LAWFUL REASON FOR PROCESSING	PROSPECTIVE CUSTOMER	CUSTOMER
NAME	CONSENT CONTRACTUAL	N	Y
E-MAIL ADDRESS	CONSENT CONTRACTUAL	N	Y
TELEPHONE NUMBER	CONSENT CONTRACTUAL	N	Y

APPENDIX D - List of Data Processors of LTT (Systems used by LTT to process data)

a) Auditors

- b) External IT Providers
- c) Salesforce
- d) Ringcentral
- e) Kapow
- f) Force 24
- g) Calendly
- h) Webinar Fuel
- i) Click funnels
- j) SCRM
- k) Integromat
- l) Power BI
- m) Typeform
- n) Go to webinar
- o) Facebook forms
- p) Send in Blue
- q) Twillio
- r) Zapier
- s) Supermetrics
- t) Pipedrive
- u) All other software, platforms and external consultants in the future

APPENDIX E- Retention Table

Category	Retention	DATA TYPE RETAINED	Unsubscribe Option	FREQUENCY OF PURGE
Advanced Programme Customer	7 years from date of invoice	Documents required for audit e.g. invoices, receipts, payments history	N	1 YEAR
	6 years from date of enrolment on to programme	Salesforce customer information		
	90 days	Outlook 365 Default policy for e-mails		
Digital Learn Forex Customer	7 years from date of invoice	Documents required for audit e.g. invoices, receipts, payments history	N	1 YEAR
	6 years from date of enrolment on to programme	Salesforce customer information		
	90 days	Outlook 365 Default policy for e-mails		

Privacy Policy Statement

This privacy statement is made on behalf of Learn to Trade Pty Limited (ACN 138 178 542, AFSL 339557). All references to “LTT”, “we”, “us” or “our” in this policy are references to Learn to Trade Pty Limited.

LTT is committed to protecting your privacy and to compliance with the Australian Privacy Principles contained in the Privacy Act 1988 (Cth). If you have any questions relating to this privacy statement or your privacy rights please contact us.

This Privacy Statement sets out the policy of LTT for management of personal information. We are committed to ensuring the privacy of your information and recognise that you, as a customer, are concerned about your privacy and about the confidentiality and security of information that LTT may hold about you.

This Policy is designed to inform customers of:

The LTT Privacy Policy;

- What information we collect and the purposes for which we collect it;
- Use and disclosure of information collected;
- Security of your personal information;
- Gaining access to information we hold about you;
- What to do if you believe the information we hold about you is inaccurate;
- Complaints in relation to privacy; and
- How to contact us.

Personal Information

Personal information is information or an opinion about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion. LTT will also collect any personal information necessary for the purposes of complying with the Anti-Money Laundering and Counter-Terrorism Financing Act 2006. The information we collect from you will depend on what services we provide to you and may include your name, address and contact details, your e-mail address and identification and verification information.

Open and transparent management of personal information

LTT seeks to ensure that personal information we hold about an individual is managed in an open and transparent manner. We have implemented procedures to ensure compliance with the Australian Privacy Principles and any applicable codes, and to deal with any complaints relating to our compliance therewith.

LTT has a clear and up-to-date privacy policy outlining our management of personal information, including details regarding the kind of personal information we collect and hold; how and why we collect and hold this information, and how an individual may access and seek correction of the information we hold about them. We further provide details regarding our complaints handling process, our policy on disclosure of information to overseas recipients (and if so, which countries).

Collection of personal information

This policy details how LTT adheres to the Australian Privacy Principles regarding the collection of solicited personal information. LTT only collects personal information directly from individuals, which is reasonably necessary for the provision of our services, and only by lawful and fair means. Information is generally sought through our course registration and application forms, in which the purpose is articulated. Accordingly, we will always ensure you are apprised of our purpose in collecting information, and your right to gain access to such information. If you do not provide the information requested, we may be unable to provide you with our services.

Please note that generally we will only use the personal information we collect for the main purposes disclosed at the time of collection such as to provide financial services.

Where possible we will collect the information directly from you via our course registration, enrolment form and Live chat.

We may also collect information about you from our web site but this information will only identify who you are if you provide us with your details (eg. if you e-mail your contact details to us). When you visit

our web site our web server collects the following types of information for statistical purposes:

- your Internet service provider's address;
- the number of users who visit the web site;
- the date and time of each visit;
- the pages accessed and the documents downloaded;
- the type of browser used.

No attempt is made to identify individual users from this information. The LTT web site contains links to the web sites of third parties. If you access those third party web sites they may collect information about you. LTT does not collect information about you from the third parties. You will need to contact them to ascertain their privacy standards.

Cookies

A cookie is a small text file placed on your computer hard drive by a web page server. Cookies may be accessed later by our web server. Cookies store information about your use of our web site. Cookies also allow us to provide you with more personalised service when using our web site.

LTT uses cookies to:

- determine whether you have previously used the LTT web site;
- identify the pages you have accessed; and
- facilitate administration of the site and for security purposes.

Most web browsers are set to accept cookies but you may configure your browser not to accept cookies. If you set your browser to reject cookies you may not be able to make full use of the LTT web site. In line with normal business practices we use Google Analytics and re-marketing services and Google and other third party suppliers provide advertising services online on our behalf. LTT and third-party vendors, including Google, use first-party cookies (such as the Google Analytics cookie) and third-party cookies (such as the DoubleClick cookie) together to inform, optimize, and serve ads based on someone's past visits to your website.

LTT and third-party vendors, including Google, use first-party cookies (such as the Google Analytics cookies) and third-party cookies (such

as the DoubleClick cookie) together to report how your ad impressions, other uses of ad services, and interactions with these ad impressions and ad services are related to visits to your site. If you don't wish to be contacted in this way Google provide a service to opt out.

E-mail address

If you provide us with your e-mail address during a visit to our web site it will only be used for the purpose for which you provided it to us. It will not be added to a mailing list without your consent unless the mailing list is related to the purpose for which you provided your e-mail address to us. We may use your e-mail address, for example, to provide you with information about a particular service or respond to a message you have sent to us.

If you subscribe to one of our services and provide your e-mail address to us so that we may communicate with you through e-mail, we may also use your e-mail address to advise you of upgrades and changes to those services.

Unsolicited personal information

We require that all e-mails promoting Learn to Trade or its products are sent only to clients who have agreed to receive such messages. We prohibit any advertising of our brand and Web site using unsolicited email messages. Not complying with this policy will cause partnership termination and/or affiliate account termination.

If you feel you've been sent unsolicited emails promoting our brand or website and would like to register a complaint, please email our abuse department at: info@learntotrade.com.au. We will immediately investigate all allegations made related to unsolicited messages.

Notification of the collection of personal information

When we obtain personal information about you, we ensure that you have our contact details and that you are aware of the collection of information and our purposes for doing so. As per above, we are unable to provide certain services if the requested information is not

provided. We do not disclose your information to third parties, unless they are related entities or services providers, in which case they are required to conform to our procedures.

Use and disclosure of personal information

LTT collects and holds personal information about an individual for the purpose of providing financial services. We collect this information with your consent as per our application forms or other documentation, for the primary purpose disclosed to you at the time of collection.

However, in some cases LTT will use or disclose personal information for secondary purposes (any purpose other than a primary purpose). Personal information obtained to provide financial services may be applied to secondary purposes if the secondary purpose is related to the primary purpose of collection and the person concerned would reasonably expect the personal information to be used or disclosed for such secondary purpose.

In some cases we may ask you to consent to any collection, use or disclosure of your personal information. Your consent will usually be required in writing but we may accept verbal consent in certain circumstances. We may also disclose your personal information where it is required or authorised by law.

We may use your personal information to:

- process your registration or course enrolment application;
- respond to any specific requests you may make of us;
- notify you of any products that may be of interest to you;
- audit and monitor the services we provide to you;
- update your personal files; and
- enable us to meet our obligations under law, for example, the Anti-Money Laundering and Counter Terrorism Financing Act 2006 (Cth) and Australian taxation laws.

We may disclose your personal information to:

- our agents, contractors or third party service providers to enable them to provide administrative and other support services to us; and

- where the disclosure is required by law, for example to government agencies and regulatory bodies as part of our statutory obligations, or for law enforcement purposes.
- LTT may use third party service providers to maintain some of our data systems and provide auxiliary services. We require any party that has access to personal information to conform to our privacy standards.

Direct Marketing

LTT will only use personal information obtained for the provision of financial services, for the secondary purpose of direct marketing where:

1. LTT collected the personal information from the individual; and
2. The individual would reasonably expect LTT to use or disclose the information for the purpose of direct marketing; and
3. LTT provides a simple means through which an individual can request to not receive marketing communications; and
4. The individual has NOT requested such communications cease.

Often the law requires us to advise you of certain changes to products/ services or regulations. You will continue to receive this information from us even if you choose not to receive direct marketing information from us. We will not disclose your information to any outside parties for the purpose of allowing them to directly market to you.

Cross border disclosure/Sensitive information/Use of government identifiers/Anonymity & Pseudonymity

LTT does not, for the purposes of the Privacy Act, collect sensitive information. Wherever lawful and practicable, individuals may deal anonymously with LTT but given the nature of our services, it is unlikely that this will be a viable option. LTT does not use official identifiers (e.g. tax file numbers) to identify individuals. An individual's name or Australian Business Number is not an identifier for the purposes of the Privacy Act and hence may be used to identify individuals.

LTT may on occasion transfer personal information to its parent company overseas.

Quality of personal information

LTT takes all reasonable steps to ensure the personal information held about individuals is accurate, up-to-date and complete. We verify personal information at the point of collection. The accuracy of records is also maintained by regular mail-out of statements.

LTT encourage you to help us by telling us immediately if you change your contact details (such as your phone number, street address or email address) or if any of your details need to be corrected or updated. A person wishing to update their personal information may contact our staff or the Privacy Officer on the contact details shown within this document.

Access to personal information

Where a person requests access to their personal information, our policy is, subject to certain conditions (as outlined below) to permit access. LTT will correct personal information where that information is found to be inaccurate, incomplete or out of date. We will not charge you a fee for your access request but may charge you the reasonable cost of processing your request.

If a person wishes to access their personal information or correct it, they should contact the Privacy Officer, and we will seek to provide such information within a reasonable period of time, and in the manner so requested (where reasonable to do so).

LTT may not always be able to give you access to all the personal information we hold about you. If this is the case, we will provide a written explanation of the reasons for our refusal; together with details of our complaints process for if you wish to challenge the decision.

We may not be able to give you access to information in the following circumstances:

- 1. Where we reasonably believe this may pose a serious threat to the life, health or safety of any individual or to public health/safety;**
- 2. Which would unreasonably impact the privacy of another individual;**
- 3. Where such request is reasonably considered to be frivolous or**

vexatious;

4. Which relates to existing or anticipated legal proceedings which would otherwise not be accessible in the discovery process relating to such proceedings;
5. Which would reveal our intentions and thereby prejudice our negotiations with you;
6. Which would be unlawful;
7. Which is prohibited by law or a court/tribunal order;
8. Which relates to suspected unlawful activity or serious misconduct, where access would likely prejudice the taking of appropriate action in relation thereto;
9. Where enforcement activities conducted by or on behalf of an enforcement body may be prejudiced; or
10. Where access would reveal details regarding a commercially sensitive decision-making process.

Correction of personal information

Where LTT believes information we hold about an individual is inaccurate, out-of-date, incomplete, irrelevant or misleading, OR an individual requests us to correct information held about them, LTT will take all reasonable steps to correct such information in a reasonable time frame. No fees are payable for such requests. If you request us to similarly advise a relevant third party of such correction, we will facilitate that notification unless impracticable or unlawful for us to do so.

If LTT intends to refuse to comply with your correction request, we will notify you in writing of our reasons for such refusal, and the complaints process you may avail if you wish to challenge that decision. You may also request that we associate the personal information we hold with a statement regarding your view of its inaccuracy.

Security of personal information

We take reasonable steps and precautions to keep personal information secure from loss, misuse, and interference, and from unauthorised access, modification or disclosure

If you use the Internet to communicate with us, you should be aware that there are inherent risks in transmitting information over the Internet. LTT does not have control over information while in transit over the Internet and we cannot guarantee its security.

Where information is no longer required to be held or retained by LTT for any purpose or legal obligation, we will take all reasonable steps to destroy or de-identify the information accordingly.

Privacy Complaints

If you have a complaint relating to our compliance with privacy laws or our treatment of your personal information, please contact our Privacy Officer at the following:

Learn to Trade Pty Ltd

Level 12,

141 Walker Street

2060 North Sydney NSW

You can also contact us via email at info@learntotrade.com.au between the hours of 9am – 5pm AEST

We will investigate your complaint and endeavor to resolve the issue to your satisfaction. If you are not satisfied with the outcome of your complaint, you have the right to lodge a complaint with the Office of the Australian Information Commissioner by telephoning 1300 363 992 or visiting their website at www.oaic.gov.au

General Advice Warning

LTT will only provide you with general advice, not personal advice. That means, we will not take into account your personal objectives, financial situation or needs, even if they are known. Accordingly, the advice may not be appropriate for you.

We may provide general advice regarding trade size, the level of margin needed and risk management techniques appropriate for our trading strategies.

Financial products are complex and all entail risk of loss.

Over-the-counter derivative and foreign exchange products are considered speculative because they are highly leveraged and carry risk of loss beyond your initial investment, hence should only be

traded with capital you can afford to lose. Please ensure you obtain professional advice to ensure trading or investing in any financial products is suitable for your circumstances, and ensure you obtain, read and understand any applicable offer document

Learn to Trade Pty Ltd (ABN 98 138 178 542 AFSL 339557)

Risks of trading Margin FX and CFDs

LTT's training can help you manage but not avoid the risks of trading margin Foreign eXchange and Contracts For Differences. Your broker's Product Disclosure Statement details these risks including:

- Many untrained novice traders lose much of their capital
- High leverage up to 100:1 greatly magnifies both risks and returns
- Adverse market moves can lose you all your equity and more, or at least cause your broker to call for more equity margin
- Stop losses are recommended to manage risk but may trigger "at market" orders which may be filled past the intended order level
- Markets can be volatile, jumpy, and even "gap" on surprise news/events
- Some markets can be especially illiquid and volatile if thinly traded such as cryptocurrencies
- You could become an unsecured creditor if your broker goes bust and inadequately protects its client trust accounts