

Data Protection and Privacy Policy

Data Protection Act

London Capital Group Limited (LCG) may process information relating to you (including personal data as defined under the Data Protection Act 1998), including holding such information in a manual format or electronic database, in order to satisfy any contractual, regulatory or statutory requirements we may have. Unless we receive specific written instructions to the contrary, by providing this information you agree that we may process this information in order to fulfill such obligations.

Privacy Policy

Introduction:

Protecting the security and privacy of your personal information is important to LCG and to the way it conducts its business in compliance with laws on privacy, data protection and data security. LCG hopes the policy outlined below will help you understand what information LCG may collect, how it uses and safeguards that information and with whom it may share it.

At LCG, we are committed to maintaining the highest standards of integrity in our business. In the course of our business, it is necessary to collect Personal Information about our potential clients. We take this activity seriously and seek to provide fair, secure and appropriate methods for the handling of Personal Information. All such activities are intended to be consistent with both generally accepted privacy ethics and standard business practices. Your Personal Information may be shared with a limited number of trusted partners and/or affiliates of LCG where such use is restricted to the management of your account and will not breach any elements of the UK Data Protection Act 1998.

If you have any questions or comments about LCG's Privacy Policy, please contact our Customer Support team via the details on the Contacts page.

Personally Identifiable Information

Through its websites, LCG will not collect any personally identifiable information about you (e.g. your name, address, telephone number or e-mail address ("personal information")), unless you voluntarily choose to provide it (e.g. by registration, email enquiry, survey). If you do not want your personal information collected, please do not submit it. When you do provide personal information, LCG usually uses it to respond to your enquiry, or provide you access to specific account information, and to support its customer relationship with you.

LCG may store and process personal information and share it within the LCG group of companies to better understand your business needs and how LCG can improve its products and services; or LCG (or a third party on its behalf) may use Personal Information to contact you about a LCG offer in support of your business needs or to conduct online surveys to understand better its customers' needs and profiles.

If you choose not to have your personal information used to support its customer relationship programmes (especially direct-marketing or market-research), LCG will respect your choice. LCG do not now (and do not intend to in the future) sell, rent or otherwise market your personal information to third parties.

You may opt out of receiving marketing emails at any time by selecting the 'unsubscribe' link at the top of the emails or by emailing our Customer Support team (via the details on the Contacts page) with your request.

Children

No personal information should be submitted to LCG's websites by children without the consent of their parent or guardian. LCG encourages all parents or guardians to instruct their

children in the safe and responsible use of their personal information while using the Internet. LCG will not knowingly collect or use any personal information collected from children for any purpose whatsoever, including disclosure to third parties.

Non-Personal Information Collected Automatically

When you access its websites, LCG may automatically (i.e. not by registration) collect information that is not personally identifiable (e.g. type of Internet browser and computer operating system used; domain name of the website from which you came; number of visits, average time spent, pages viewed). LCG may use this information and share it within the LCG group to measure the use of its website and improve its content.

Third Party Sites

This web site contains links to other web sites. Please be notified that LCG cannot be held responsible for the privacy practices of other web sites. We encourage all visitors to be aware and read the privacy statements of each and every web site that collects personally identifiable information.

Privacy Statement Changes

LCG may change this privacy statement at any time. You are advised to read this statement each and every time you access the site so that you are satisfied with the privacy conditions under which you provide LCG with your personal information.

UK Data Protection Act 1998

The Government of the United Kingdom passed a Data Protection Act in 1998. LCG is bound to comply with the principles of good practice in the processing of personal data. Details of Data Protection registration may be found on their website www.dpr.gov.uk

Retention of records

We will keep Personal Information only as long as it is necessary, including for the purposes of updating the product or services or as required by law. When the Personal Information is no longer required, it will be destroyed either by shredding or other approved destruction methods to prevent unauthorised parties from gaining access to the information during and after the process.

We will safeguard information in our custody.

Security

LCG takes precautions to ensure the security of your personal information and strives to keep it accurate. LCG carefully protects your personal information from loss, destruction, falsification, manipulation, and unauthorised access or unauthorised disclosure and has developed and will maintain security procedures to safeguard Personal Information against loss, theft, copying, and unauthorised disclosure, use or modification. Access to Personal Information is restricted to employees and authorised service providers who need it to perform their work.

Cookies - How is your Personal Information collected by our website?

Personal Information may be submitted on our website in two areas:

a) Public Area

If you do provide your name and address on the public area of this website in order to request information about our products and services, you may voluntarily provide additional personal information. You will be asked to provide your Personal Information in this area for the purposes of registering with LCG and opening an account with us.

b) Private Area

If you are already one of our customers and have opened an account with us, you must use a password to enter the LCG website. A "session cookie" is used to enable you to leave and re-

enter our website without re-entering your password. Our web server will record the pages you visit within our website.

To ensure a good quality of service we may monitor and record any communication you have with us whether in writing, by phone or by electronic mail. E-mail is not encrypted to/ from either the public or private areas of this website. LCG recommends that you do not send us Personal Information by e-mail.

How we use Cookies on our Site and what Information we collect.

Like most websites, LCG uses cookies to improve your experience on our websites. We do not link the information we store in cookies to any personally identifiable information you submit while on our site. If you choose to opt out of cookies you may still use our site, but your ability to use some areas will be limited. In certain circumstances, there may be instances where our content management system generates a wholly anonymous and non-intrusive cookie to your system that has not been outlined below. LCG uses the following cookies;

Strictly necessary

Cookie	Name	Purpose	Type
Limited Risk Identifier	LRA	Part of the account opening process to define whether the user is more suited to a limited risk account.	Persistent (1 day)
Unique application reference number	AppNo/apln	Generates a unique application reference if you choose to apply for an account.	Session
Logged in to platform	ASP.NET_sessionId	Allows our web servers to respond to your actions on our website.	Session
Risk Warning	count	Displays a risk warning to those on their first visit to the website.	Persistent (10 years)
Terms and Conditions	Terms(date)	Allows us to inform you of terms and conditions changes when you log into our live trading platform.	Persistent (10 years)
Application form steps	page	Allows the users details to be joined together through various application steps.	Session
Failed Application	Client UncompletedId	Reports back if an account application has failed.	Session
Geographic location	CCID	This cookie records the country you are visiting from based on your IP address. It is used for geographic specific content and allows webpages to present content specific to your location.	Persistent (30 days)

Returning user	RetUser	This cookie is used to recognise and store if you are visiting our Site (including all language versions) for the first time.	Persistent (30 days)
Returning user language	DomRetUser	This cookie is used to recognise and store if you are visiting our Site for the first time and to store the language version of our Site selected by you.	Persistent (30 days)
Fonts	sifrFetch	This cookie is used to improve your browsing experience by improving Site performance. The cookie is set when normal (html) text is replaced with a 'fancy' representation. Prevents the font replacement script from checking if 'fancy' fonts are already in place which could slow down your browser.	Session
Referrer	ITWMID, WMID	Webmaster ID – This cookie shows us how you found our Site and which website you came from. This helps us know which of our online marketing channels is most effective. They allow us to reward some external websites and affiliates for directing you to us	Persistent (30 days)
Identify traffic with tracking codes	SITE_PARAMS	This cookie stores all arguments and their values passed in the query string of the url (after question mark).	Persistent (1800 days)
Referrers	TDPEH TDUID VALUE	These cookies are used in conjunction with the WMID cookie to determine the source of website traffic.	Persistent (30 days)

Functionality Cookies

Create Account ID record	cemail	Creates an account ID in our system based on the user's e-mail address when they fill out an application form.	Persistent (1 day)
Promotional Offer	promocode	Contains a promotional code to populate the live application form if applicable.	Session
Javascript Identifier	has_js	Used to determine whether the user's browser accepts Javascript.	Session
Game Identifier	GameID	During a promotional trading game we may use this cookie to identify if you are enrolled.	Persistent (30 days)
LiveChat	Pid LivePersonID HumanClickKEY HumanClickCHATKEY HumanClickACTIVE	LivePerson LiveChat service uses cookies to enhance the user experience by recognising a user's return visit. The cookies are being set in .liveperson.com domain.	Session

	HumanClickSiteCont ain erID_22070814	Policy http://www.liveperson.com/policies/privacy	
Video download	BC_BANDWIDTH	BC_BANDWIDTH - BrightCove Video Cloud service cookie detects initial bandwidth capability for progressive download deliveries. BrightCove sets also additional cookies in .tubemogul.com domain. Policy: http://support.brightcove.com/en/docs/video-cloud-player-cookies	Session

Performance Cookies

Google Analytics	_umta _umtb _umtc _umtz _umtv	Google Analytics is a web analytics service which sets a cookie in order to evaluate your use of our Sites. Google analytics cookies are used by Vimeo Player, YouTube Player, Twitter, Facebook, LiveChat, Add2Any social widget Policies/ How to reject or delete these cookies http://www.google.com/policies/privacy/ https://www.facebook.com/about/privacy/ https://twitter.com/privacy http://vimeo.com/privacy	Persistent 30 minutes 30 minutes 6 months Persistent
Video downloads	_tmid	BrightCove Video Cloud service cookie identifies unique viewers and new viewers. Policy http://support.brightcove.com/en/docs/video-cloud-player-cookies	Persistent (1 year)
Adform	TPC uid C cid GCM	Creates a randomly generated user ID to identify repeat visits by users and help us to understand users' journeys on our site.	Session & Persistent (up to 60 days)
ClickDensity / Intellitracker	Vidi ltc	Gathers typical web performance data such as information on referrer, content and page interactions.	Persistent (5 years)

Targeting or advertising cookies

3rd Party

Cookie	Name	Purpose	Type
Affiliates	Agentid	Allows us to credit affiliate websites for	Persistent (90

		driving traffic to our website.	days)
Trade doubler	GUID	Allows us to credit affiliate websites for driving traffic to our website	Persistent (90 days)
* Media6Degrees	*Media6Degrees	<p>m6d's technology uses "network neighbour" data to help us deliver relevant online advertisements. "network neighbours" are generally two or more people that visit the same website pages while surfing the Internet.</p> <p>m6d is a member of the <u>Network Advertising Initiative (NAI)</u> and is in compliance with the NAI's Self-Regulatory Principles.</p> <p>Policy http://m6d.com/info/privacy-policy/ http://m6d.com/info/consumer-assistance/</p>	Persistent (180 days)
* Adform	* Adform	<p>Adform's technology is used to create and deliver online marketing campaigns. Adform supports strict online privacy and security standards and has implemented several techniques to monitor advertising material for potentially unsafe content and unlawful privacy breaches.</p> <p>Policy http://www.adform.com/site/privacy-policy/</p>	Persistent (60 days)

We would strongly recommend that you allow cookies on our website to ensure you have the best possible experience. Turning off cookies may result in reduced performance of our website and trading platform, however if you would still like to opt out of cookies, you can do this through your website browser. Our customer support team would be happy to talk you through this process if you require assistance.

Session Cookies.

We use session cookies for the following purposes:

- To allow you to carry information across pages of our site and avoid having to re-enter information.
- Within registration to allow you to access stored information.
- Non personal data for tagging purposes only (by random number)

Persistent Cookies.

We use persistent cookies for the following purposes:

- To help us recognise you as a unique visitor (just a number) when you return to our website and to allow us to tailor content or advertisements to match your preferred interests or to avoid showing you the same adverts repeatedly.
- To compile anonymous, aggregated statistics that allow us to understand how users use our site and to help us improve the structure of our website.

- To internally identify you by account name, name, email address, customer ID, currency and location (geographic and computer ID/IP address).
- To differentiate users who are on the same network to enable us to correctly allocate bets to the appropriate account.
- Within research surveys to ensure you are not invited to complete a questionnaire too often or after you have already done so.

Third Party Cookies

Third parties serve cookies via this site. These are used for the following purposes:

- To serve advertisements on our site and track whether these advertisements are clicked on by users.
- To control how often you are shown a particular advertisement.
- To tailor content to your preferences.
- To count the number of anonymous users of our site.
- For website usage analysis

Use of Web Beacons

Some of our Web pages may contain electronic images known as Web beacons (sometimes known as clear gifs) that allow us to count users who have visited these pages. Web beacons collect only limited information which includes a cookie number, time and date of a page view, and a description of the page on which the Web beacon resides. We may also carry web beacons placed by third party advertisers. These beacons do not carry any personally identifiable information and are only used to track the effectiveness of a particular campaign.

Disabling/Enabling Cookies

You have the ability to accept or decline cookies by modifying the settings in your browser. However, you may not be able to use all the interactive features of our site if cookies are disabled.

To find out how to enable/disable cookies see www.allaboutcookies.org

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