



SGT Markets
Setting the Standard Since 2006

Privacy Policy

Introduction

Protecting your personal information is important to us. We have, therefore, created this statement in accordance with the EU data protection regime introduced by the General Data Protection Regulation (Regulation 2016/679 the “GDPR”). GDPR strengthens and unifies data protection across the European Union. It also applies to all organisations that hold or process the personal information of EU-based individuals.

The legislation is intended to ensure that all personal information held by organisations (including, for example, an email address) which might allow you, as an individual, to be identified, is accurate and secure and there is no miss-use of personal information by that organisation.

This document sets out how the Sterling Gent Trading Ltd. (“SGT”) collects, uses and safeguards the personal information that you, as an individual, provide to us.

This statement covers all communication with SGT, including users of SGT websites.

In this privacy statement:

“you” or “your” refers to you as an individual and not to any legal entity (such as your employer) which you may be representing by viewing our websites or communicating with us “our”, “ours”, “we” or “us” refers to SGT.

Please note, if you provide personal information relating to other individuals (for example contact details in a work context), you must either advise those individuals of the details of this statement or provide them with a link to this statement.

By providing your information to SGT you consent to the collection and use of your personal information in the manner set out below.

The privacy statement covers only SGT, it does not cover the privacy policies of other entities which may be accessible through, or linked to, any SGT website or communication.

We will not notify you separately of any changes or updates to this privacy statement, but instead will post them to this page. Any change or update will be effective immediately upon posting

Should you have any questions on this statement, please email them to:
compliance@sgtmarkets.com

Information Collected by Sterling Gent Trading

When you visit an SGT website or contact with SGT, and when providing any services to you, SGT may collect personally identifiable information about you from information provided by you.

This can include the following information relating to you: name, address (residential or corporate), geographical location, email address, contact details, corporate contact information, correspondence records.

We may also obtain personal information on you from other public sources.

Purposes of Processing and Legal basis for processing

Generally, SGT will use the personal information provided by you to:

Create an account allowing access to detailed information about the funds we manage.

Facilitate the administration of a website account.

Email updates relating to the products and services that SGT and related parties offer Respond to queries or provide services to you.

Maintain or update contact data about you or a third party (for example your employer) within SGT's systems.

Enable us to act on any agreement with you, your employer or any other relevant third party.

Provide to any third parties that may host, maintain or manage services for SGT, solely to the extent necessary to fulfil their hosting, maintenance or service management functions.

We will never share your personal information with others for marketing purposes, unless you have given us your explicit permission to do so.

Where you have done so, we will only share your information with:

Those service providers that help us manage our marketing activities; or with related parties for the purposes of providing you with related products and services.

Accordingly, you understand that we may use your personal information for the purposes as described above, provided that we are acting in a fair, transparent and accountable manner and that we have taken appropriate steps to prevent the activity having any unwarranted impact on you and also noting your right to object to such use, as discussed below.

Should we wish to use your personal information for other purposes (including, if applicable, any purpose that requires your additional consent), we will contact you.

The categories of nonpublic personal information which Sterling Gent Trading Ltd shall collect include:

1. information provided by the customer when opening an account, or to process a transaction, such as name, address, assets, bank information, prior trading experience, etc.;
2. information used to verify the identity of the customer, including copies of government issued identification materials such as passports, driver's licenses, and credit reports

3. information resulting from transactions between the customer and Sterling Gent Trading Ltd or an affiliate of Sterling Gent Trading Ltd, such as withdrawal and deposit forms;
4. information derived from customer's navigation and usage of Sterling Gent Trading Ltd.'s website and online platforms, including account trading statements;

Usage of Personal

Information

Sterling Gent Trading Ltd may use the information collected from you to verify your identity and contact information. Sterling Gent Trading Ltd may also use this information to establish and setup your trading or demo account, issue an account number and a secure password, maintain your account activity, and contact you with account information.

Should you close your account, Sterling Gent Trading Ltd will retain your information, but only use it to comply with regulatory requirements and to periodically contact you to offer you the opportunity to reactivate your account or participate in other valuable offers.

Recipients of Data and Transfer of Data

SGT may disclose personal information to:

Entities within the SGT group, service providers of the business it manages, its service providers and their respective affiliates engaged by SGT to process data for the above-mentioned purposes;

To regulatory authorities, courts and bodies as required by law or to service providers for internal investigations and reporting.

The disclosure of personal information to the third parties set out above may involve the transfer of data other jurisdictions outside the European Economic Area ("EEA") which may include the United States. Any transmission of personal information by SGT or its service providers outside the EEA shall be in accordance with the conditions of the GDPR. These countries may not have the same data protection laws that apply in the EEA, but SGT will authorise its group entities or other service providers to transfer personal information to other countries only where standard contractual clauses or other safeguards permitted under the GDPR have been put in place with parties to whom personal information will be transferred.

SGT and its service providers apply appropriate information security measures designed to protect personal information in its or its service providers' possession from unauthorised access by third parties or from any form of computer corruption.

Information Disclosed by Sterling Gent Trading Ltd and To Whom Sterling Gent Trading Ltd Discloses the Information

Sterling Gent Trading Ltd may share information with affiliates if the information is required to provide the product or service you have requested or to provide you the opportunity

to participate in the products or services our affiliates offer.

Except for the limited circumstances described below or as otherwise permitted by law, Sterling Gent Trading Ltd does not share nonpublic personal information about our current or former customers with any third parties.

* Sterling Gent Trading Ltd may share nonpublic personal information with introducing brokers for translation services. When introducing brokers provide translation services, we endeavor to protect such personal information by requiring those introducing brokers to enter into an agreement with Sterling Gent Trading Ltd to safeguard the confidentiality of personal information.

* When a client is referred by an introducing broker, Sterling Gent Trading Ltd generally shares nonpublic personal information concerning the account opening and maintenance process with the introducing broker who made the referral.

* Sterling Gent Trading Ltd may engage another business or person to help us identify client and demo user needs and notify clients and demo users of product and service offerings. Use of the information shared is limited to the performance of the task we request and is not used for any other purpose. These third parties are required to enter into an agreement with Sterling Gent Trading Ltd to safeguard the confidentiality of personal information before they provide such services. Examples of information shared are identifying information such as name, mailing address, e-mail address and telephone number and information on account activity.

* Sterling Gent Trading Ltd may provide information to non-affiliated third parties, as permitted by law, in providing financial services to you.

* Sterling Gent Trading Ltd may provide information, as permitted by law, to government or regulatory agencies and to comply with a legal summons, court order, subpoena or a similar legal process, audit or investigation; and

* Sterling Gent Trading Ltd may also disclose your nonpublic personal information if you authorize such disclosure.

If you do not wish to have Sterling Gent Trading Ltd share nonpublic personal information with non-affiliated third parties pursuant to any of the provisions listed above, please opt out of those provisions by sending an e-mail to compliance@sgtmarkets.com or calling Sterling Gent Trading Ltd at +44 800 298 7925. Opting out will apply for all financial products or services you obtain through Sterling Gent Trading Ltd. Please note that you cannot opt out of any provisions if sharing of the information is required by law. Further, please note that an opt-out election must be made for each separate account you hold at Sterling Gent Trading Ltd or with any Sterling Gent Trading Ltd affiliates.

Third party sites

Our communications may contain links to third party websites. As we do not control the information on these websites, you should review their privacy policies and cookies to learn about how that website may collect and use your personal information.

When accessing any third party sites that may be linked you will leave this website. These third party sites are not controlled or endorsed by SGT. SGT is not responsible for the contents, operation or security of such sites.

Retention period

SGT will retain personal information only for as long as required for the purposes set out above. Once the personal information is no longer required, we will take appropriate steps to dispose of any records containing your personal information, to the extent this is operationally feasible and proportionate.

Data subject rights

Where SGT holds personal information, the owner of that information has the following rights, in certain circumstances, in relation to their personal information:

- Right to access any personal data held
- Right to have any inaccurate personal data rectified
- Right to restrict the use of personal data
- Right to request that personal data is erased
- Right to object to the processing of personal data
- Right to obtain a copy of any personal data held in electronic form (data portability)

SGT will notify you of any personal data breach affecting you that is likely to result in a high risk to your rights and freedoms.

You also have the right to lodge a complaint with the Office of the Data Protection Commissioner, or your local supervisory authority, if you consider that the processing of your personal information by us infringes the Data Protection Legislation.

If your personal information has changed or requires correcting, please let us know by emailing compliance@sgtmarkets.com so that we can update our records.

Opting out of receiving communications

SGT and its service providers from time to time send communications, such as market holiday schedules, changes in margin requirements, new instruments or products, general SGT updates and event information. All such communications from us include an “unsubscribe” link which can be clicked should you no longer wish to receive these types of communication from us. Alternatively, you can send an email to compliance@sgtmarkets.com requesting to be removed from some of or all our mailing lists.

Personal data requests

Any questions about our use of your personal information should be directed to SGT at compliance@sgtmarkets.com

Confidentiality and Security Procedures

Only those staff members for whom the information is necessary to complete a given transaction shall possess the authority to access the information. Sterling Gent Trading Ltd,

its personnel, and its affiliates shall strictly adhere to security practices and procedures to ensure the confidentiality of its customers' information.

Sterling Gent Trading Ltd maintains numerous safeguards that comply with Federal regulations to guard your nonpublic personal information including the use of encryption technology, firewalls and authentication systems (usernames and passwords).

Sterling Gent Trading Ltd will continue to protect the privacy of former customers' nonpublic personal information in the same manner as when they were customers. Unlike current customers, however, former customers will not receive annual privacy notices.

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Cookies

Introduction

A cookie is a small text file placed on your device that stores information about a user's use of a website. Tracking technologies, such as cookies and local shared objects (sometimes called "Flash cookies") may be used by this website. We use cookies for allowing the website to work and enhancing usability, as well as for providing information to us. The different types of cookie we use are outlined below:

"Session based": This is a temporary cookie and, once you close out of the website, any information is no longer needed and is deleted. It is essential for parts of the website to operate and is used to allow the website to carry background information as you navigate between pages, allowing the website to provide you an efficient service.

"Persistent": This remains in the cookie file of your browser even after you log out of the website or close the browser. It enables a website to remember you the next time you visit the website and can remember your site settings preferences. You will be asked for your explicit consent before agreeing to the use of this function.

Given the nature of some cookies however, you may not be able to use all features of the website, or access secure areas, if these are disabled.

For more information on cookies and why they are used, please visit: www.allaboutcookies.org

How we use cookies

SGT websites use cookies in the following ways:

Enabling us to provide you requested services, including, where those services are held in secure areas of our websites, by identifying and authenticating you.

Measuring your use of our websites so that we can improve them, enhancing overall user experience.

Measuring the effectiveness of our performance updates, factsheets, information campaigns and event invitations (we may also use cookies from third-parties to help us to do this).
Understanding when or if emails sent from or documents held on our websites have been opened and acted upon.

Some of our cookies may collect and store your personal information. Protecting your personal data is important to us and we will ensure that all personal information collected by us is handled in accordance with our privacy statement.

SGT may set cookies and other data capture mechanisms on your computer that allow us to store data about your visit. Cookies help us learn which areas of our site are useful and which areas need improvement. You may configure your browser to prevent cookies from being set on your computer. If you do so, you may still access the website but certain features may be disabled and/or not function properly.

Managing Cookies

You have the ability to change your internet browser settings to accept or reject cookies. To find out how to do this please either refer to the “Help” menu of your specific browser or visit www.allaboutcookies.org - Manage Cookies.

If you do not wish to accept cookies from this website, please either disable them or leave this website. If cookies are disabled, however, it may mean that either you experience reduced functionality or may be prevented from using some, or all, of this site.

Security Technology

Sterling Gent Trading Ltd uses Secure Socket Layer (SSL) encryption technology in order to protect certain information that is submitted. This technology protects you from having your information intercepted by anyone other than Sterling Gent Trading Ltd while it is being transmitted to us. We work diligently to ensure that our Web sites are secure and that they meet industry standards. We also use other safeguards such as firewalls, authentication systems (e.g., passwords and personal identification numbers), and access control mechanisms to control unauthorized access to systems and data.