

# Privacy Notice

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## INTRODUCTION

Triland Metals Limited ("Triland", "we", "us") respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

Whilst all Triland's customers are corporate or institutional organisations, in the course of serving such customers, we may obtain personal information about you as an individual. Your privacy is important to us and we value the trust that you place on its safekeeping with us. If you have any questions or comments about this privacy notice or the way we collect and process your personal data, please do not hesitate to contact us.

## 1. IMPORTANT INFORMATION AND WHO WE ARE

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### PURPOSE OF THIS PRIVACY NOTICE

This privacy notice gives you important information on how Triland collects and processes personal data, including any data provided through this website, or when you sign up to our market reports, purchase a product or service, or apply for jobs at Triland.

The services we provide are not intended for individual persons and our counterparties are wholly corporate bodies. As such, our processing activities in respect of personal information are of an ancillary nature, as further detailed below.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

### CONTROLLER

Triland is the controller and responsible for your personal data. Our organisation is made up of different legal entities (together, the "Triland Group"), details of which can be found on our website on the [Contact Us](#) page. This privacy notice is issued on behalf of the Triland Group so when we mention "Triland", "we", "us" or "our" in this privacy notice, we are referring to the relevant company in the Triland Group responsible for processing your data. We are the controller and responsible for this website.

Triland's Compliance team and Data Security Officer are responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us using the details set out below.

## CONTACT DETAILS

Company name: Triland Metals Limited  
Data Security Officer: David Cumming  
Email address: [dataprotection@triland.com](mailto:dataprotection@triland.com)  
Postal address: MidCity Place, 71 High Holborn,  
London WC1V 6BA, United  
Kingdom  
Telephone number: +44 (0)20 7061 5568

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## 2. THE DATA WE COLLECT ABOUT YOU

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Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- ♦ **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- ♦ **Contact Data** includes postal address, email address and telephone numbers.
- ♦ **Transaction Data** includes details about payments to and from you or the organisation you represent and other details of products and services you or the organisation you represent have received from us.
- ♦ **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website and receive products and services from us.
- ♦ **Profile Data** includes your username and password, orders and transactions made by you, suitability

## CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

**This version was last updated on May 2018.**

Historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## THIRD-PARTY LINKS

This website and any materials we send to you may include links to third-party websites, plug-ins and applications. Visiting or clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

information, your interests, preferences, feedback and survey responses.

- ♦ **Usage Data** includes information about how you use our website, products and services.
- ♦ **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

## IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you or your organisation and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you or the organisation you represent (for example, to

provide you or the organisation you represent with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

## 3. HOW IS YOUR PERSONAL DATA COLLECTED?

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We use different methods to collect data from and about you including through:

- ♦ **Direct interactions.** You (or someone acting on your behalf) may give us personal data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data we are provided with in connection with:
  - ♦ entering into a business relationship with us;
  - ♦ applying for our products or services;
  - ♦ creating an account on our website or otherwise;
  - ♦ subscribing to our service or publications;
  - ♦ requesting marketing to be sent to you;
- ♦ **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our cookie policy for further details.
- ♦ **Third parties or publicly available sources.** We may receive personal data about you from various third parties such as credit reference agencies, a member of the Triland Group, introducing brokers and intermediaries, or someone acting on your behalf.

## 4. HOW WE USE YOUR PERSONAL DATA

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We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- ♦ Where we need to perform the contract we are about to enter into or have entered into with you or as someone associated with our corporate or institutional client.
- ♦ Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- ♦ Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time. If you wish to withdraw consent, please [Contact Us](#).

## PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

In no event does Triland sell or trade your personal data.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [Contact Us](#) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

## LAWFUL BASES AND PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

Basis for processing your personal data	Type of data	Key activities
<b>To comply with our legal and regulatory obligations, including:</b> <ul style="list-style-type: none"> <li>The rules and regulations of the Financial Conduct Authority (FCA) and other regulatory bodies pursuant to which we: <ul style="list-style-type: none"> <li>carry out KYC and due diligence</li> <li>assess suitability for particular products and services</li> <li>implement measures in order to prevent market abuse and fraud</li> <li>detect transactions which deviate from normal patterns</li> <li>monitor and report transactions and associated risks</li> <li>record phone calls, chats and emails, where required</li> <li>maintain records in connection with services and transactions</li> <li>cooperate with regulators and official enquiries or requests</li> </ul> </li> <li>Prevention of money-laundering and terrorist financing</li> <li>Compliance with sanctions legislation and embargoes</li> <li>Prevention of tax fraud, tax evasion or its facilitation and compliance with tax controls</li> <li>Preventing any other types of financial crime and/or breaches of applicable law</li> </ul>	Identity Contact Transaction	Account-opening Account review Account, relationship, order and transaction handling and management Regulatory risk management activity, including financial crime; AML review, tax notification, identity screening and verification Monitoring orders and transactions Reporting transactions or positions to regulators, exchanges, trade repositories or similar entities
<b>To perform a contract with you or your organisation, including:</b> <ul style="list-style-type: none"> <li>Providing you with information regarding our products and services</li> <li>Assisting you with enquiries and requests</li> <li>Entering into transactions with you</li> <li>Receiving and accepting orders from you</li> <li>Assess suitability for particular products and services and under what other conditions, including: <ul style="list-style-type: none"> <li>setting up users for our trading applications and online services</li> <li>providing training or assistance with our services</li> </ul> </li> </ul>	Identity Contact Transaction Technical Profile Usage	Account, relationship, order and transaction handling and management Product offerings and service set-up, e.g. Tri-X, Triton, TriReports Education and training events, seminars and workshops
<b>To fulfil our legitimate interest, including:</b> <ul style="list-style-type: none"> <li>Preventing crime, money laundering, fraud, financial crime and/or other breaches of applicable law</li> <li>To keep our records updated and to run our business administration <ul style="list-style-type: none"> <li>Safeguarding against loss, theft, unauthorised processing and misuse</li> </ul> </li> <li>Improving and developing our products or services <ul style="list-style-type: none"> <li>Statistical analyses for business growth and marketing strategy; improving our services and creating new product offerings</li> <li>Personalising our services to your organisation and better understand you and your organisation's interests</li> <li>Inviting you to participate in surveys and provide feedback to us</li> </ul> </li> <li>IT and IT infrastructure development and management <ul style="list-style-type: none"> <li>IT security, business continuity and disaster recovery</li> </ul> </li> <li>Delivering relevant website content and using data analytics <ul style="list-style-type: none"> <li>Developing advertisements and measuring the effectiveness of marketing activities and user experience</li> </ul> </li> <li>Exercising and defending our legal rights <ul style="list-style-type: none"> <li>Proof of transactions, debt recovery</li> <li>Proof of evidence of authority of persons acting on behalf of our counterparties</li> <li>Copyright and trademark infringement</li> </ul> </li> </ul>	Identity Contact Transaction Technical Profile Usage Marketing and Communication	Administration and operation of our business Keeping our website updated and relevant, including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data Staff training Contacting you about our services and product offerings (with your prior consent where required by applicable law) Monitoring and review

#### 4. HOW WE USE YOUR PERSONAL DATA (Continued)

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##### MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. If you have any questions or comments please [Contact Us](#).

##### PROMOTIONAL OFFERS FROM US

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or received services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

##### THIRD-PARTY MARKETING

We will get your express opt-in consent before we share your personal data with any company outside the Triland group of companies for marketing purposes.

##### OPTING OUT

You can ask us or third parties to stop sending you marketing messages; please [Contact Us](#) at any time.

Where you opt out of receiving these marketing messages, this

will not apply to personal data provided to us as a result of a product/service, warranty registration, product/service experience or other transactions.

##### COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our [Cookie Policy](#) on our website.

##### CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [Contact Us](#).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

#### 5. DISCLOSURES OF YOUR PERSONAL DATA

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We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- ♦ Triland Group entities
- ♦ Service providers which perform services on our behalf, including ratings agencies, screening service providers, fraud prevention agencies and consultancy firms
- ♦ Persons acting on your behalf
- ♦ Independent agents, intermediaries or brokers with which we have a regular relationship

- ♦ Regulatory, taxation or judicial bodies upon request and to the extent permitted by law
- ♦ Exchanges, trading venues and clearing houses
- ♦ Certain regulated professionals such as lawyers and auditors

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We only permit our third-party service providers to process your personal data for specified purposes and in accordance with our instructions.

## 6. INTERNATIONAL TRANSFERS

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We share your personal data within the Triland Group. This will involve transferring your data outside the European Economic Area (EEA).

Some of our external third parties are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- ♦ We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see [European Commission: Adequacy of the protection of personal data in non-EU countries](#).

- ♦ Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see [European Commission: Model contracts for the transfer of personal data to third countries](#).
- ♦ Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see [European Commission: EU-US Privacy Shield](#).

Please [Contact Us](#) if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## 7. DATA SECURITY

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We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

Triland implements and maintains information security practices that integrate the protection of personal data into the process lifecycles of the business.

We have also put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 8. DATA RETENTION

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### HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we

process your personal data and whether we can achieve those purposes through other means, and the applicable legal and regulatory requirements. Most personal data collected in relation to a specified customer is kept for the duration of the contractual relationship with the customer, plus the number of years specified in applicable rules and/or regulations.

Details of retention periods for different aspects of your personal data are available upon request; please [Contact Us](#) if you require more information.



## 9. YOUR LEGAL RIGHTS

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Under certain circumstances, you have rights under data protection laws in relation to your personal data. If you wish to exercise any of the rights set out below, please [Contact Us](#).

- ♦ **Access** | You can receive information about how we process your personal data and a copy of such personal data. This is commonly known as a “data subject access request”.
- ♦ **Rectification** | You can require us to correct your personal data, where you consider it to be inaccurate or incomplete.
- ♦ **Erasure** | You can require the deletion of your personal data, to the extent permitted by law.
- ♦ **Restriction** | You can request the restriction of the processing of your personal data.
- ♦ **Objection** | You may object to the processing of your personal data on grounds relating to your particular situation. In the case of direct marketing, we will immediately cease further processing if we receive your objection.
- ♦ **Transfer** | Where legally applicable, you can require us to transfer (or have returned) your personal data where technically feasible.
- ♦ **Consent withdrawal** | You have the right to withdraw your consent at any time.

### NO FEE

In most cases, you will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

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### Triland Metals Limited

MidCity Place  
71 High Holborn  
London WC1V 6BA  
United Kingdom  
+44 20 7061 5500  
[www.triland.com](http://www.triland.com)

Triland Metals Tokyo Ltd.  
7-2 Marunouchi  
2-Chome, Chiyoda-ku  
Tokyo 100-7027  
Japan

Triland Metals Americas Inc.  
655 Third Avenue  
New York  
NY10017  
United States

Triland Metals Singapore Pte. Ltd.  
3 Temasek Avenue  
#32-01 Centennial Tower  
Singapore 039190