

**PRIVACY POLICY  
OF BENCHMARK FINANCE**

Please read the provided information in the following document carefully and if you have any further questions or concerns, do not hesitate to reach us at the below contact details.

## **1. Who is administrating your personal data**

Your personal data shall be administered entirely by BenchMark Finance Jsc, whose registered address is 32, Cherni vruch Blvd., ent. A, Sofia, 1407, Bulgaria, authorized and regulated by the Financial Supervision Commission (FSC), with license № 03-0212/09.05.2006, registered in the Commercial register of the Registry Agency with Unified Identity Code (UIC) 131225156, hereinafter the "Company".

## **2. Why do we need to collect your personal data**

If a prospective client decides to open an account with the Company, there is certain personal information that will be required in order to identify them when applying for a live account. This information includes, but is not limited to, personal data such as name, address, date and place of birth, phone number and other contact details, passport details, employment details, as well as other necessary financial information. The purpose for the recollection of this information is to identify the prospective client and to assess whether the service requested by them is appropriate. From time to time, the Company may require further information which will help to fulfill the regulatory duty to maintain the client verification data in current form and volume.

In accordance with the applicable laws, the Company is required to process personal data in order to identify and categorize its clients, to determine their tax status and to initiate actions for anti-money laundering and fraud prevention. The Company obligations are stipulated in the Markets in Financial Instruments Act, the Anti-money Laundering Act and their correspondent regulations. If a client decides that he does not want to share certain personal data, the Company may not be able to provide the requested service. Personal information is collected besides in the aforementioned cases, but also in instances when the Company provides a client with information about products and services, that the Company deem of interest to a client. In such occasions, the Company processes client's personal data in pursuit of the clients' consent. A client should inform the Company if he wishes its personal data to be deleted with an immediate effect by the Company.

If you register for our product "Free education on trading in Financial Markets", (e.g. by opening a demo account or by registering for seminars or courses), the amount of personal data that we require is reduced to minimum (name and contact details) for the purpose of providing a client with the service and contact. In these cases, we process the information and send you product information based on our legitimate interest in raising your knowledge and skills in the field of trading in financial instruments in order to open a real account and to improve the quality of our services.

The Company may also collect personal data through the use of "cookies", considered in [Policy for use of "cookies"](#).

For the purpose of improving our services, the Company can process any information, available in the public registers (e.g. public databases), as well as information, received during the course of conducting its legal requirements.

To keep the database records in current type, the Company may require a client to update, modify or to confirm their authenticity.

### **3. Use of information**

The Company does not reveal any personal data, unless its obliged by law to provide certain information. Under extraordinary circumstances, the Company may supply client personal data to competent public authorities and/or supervisor authorities or other person, when the Company is bound by law. In certain cases, the Company is required to reveal information to courts, regulatory or other official authorities when enforcing official act or decision; based on contract agreements between the Company and other administrators, processing personal data in accordance with the requirements of the current legislation; when a client gives specific instructions to the Company or when an authorized by the client person provide such instructions in accordance with the Trading Agreement. The Company demands all third parties, that the Company reveals personal details or such third parties that the Company can reveal such data on its behalf, to guarantee their privacy and to manage them following strictly the law.

### **4. How do we protect your data**

The Company applies physical, technological and organizational measures to guarantee the security of the data. In order to ensure this, the Company has accepted the necessary internal procedures. The Company employees are familiar with the requirements of protecting your personal data. The processing of such information is decreased to the bare minimum, required in order to accomplish the set objectives.

The Company has implemented various measures to ensure effectively applying the principals of protecting personal data, including, but not only:

- guaranteed constant confidentiality, integrity, availability and sustainability of the processing system and services;
- measures in case when there is a physical or technical incident to assure timely recovery and access to personal data;
- internal processes for testing, estimating and assessing the effectiveness of the technical and organizational measures in place in order to guarantee the security of processing;
- technical and organizational measures to avoid random or unlawful destruction, loss, amendment, unauthorized disclosure or access to personal data.

### **5. How long is your personal data stored**

The Company observe the principle that personal data should be stored for a period no longer than the period required to accomplish the set objectives. The Company stores personal details until a client terminates its agreement with the Company and for a period of 10 years after the termination of the agreement, when taking into consideration the terms of storing accounting information. Under certain circumstances, the Company might store a client personal details for longer period.

### **6. What are your rights**

In accordance with the applicable laws governing the protection of personal data, a client has the following rights:

**Right to access:** a client has the right to receive a confirmation from the Company that its data is being processed and, if so, to obtain a copy of the data and information concerning the processing. Please keep in mind that the Company may impose reasonable fee for additional copies to cover the administrative expenses.

**Right to modify:** if a client data is incomplete or inaccurate, he has the right to require them to be edited.

**Right to restrict processing:** in certain circumstances, a client may require the Company to limit the processing of its personal details. For example, if a client would like to find out the reason for collecting such information. The restricted use of personal data means only storing it with any other usage being suspended.

**Right to portability:** a client has the right to receive its personal details, submitted to the Company, in structured and widely-used format, as well as a client can transfer them to another administrator without the process being obstructed by the Company, as far as the transfer is being processed automatically on grounds on a client consent.

**Right to revoke consent:** if the processing of personal details is based on a client consent, he has the right revoke consent at any time.

**Right to make an objection:** a client can protest the right of the Company to process his personal data if there are any legal grounds for this; if the reason for a client objection is justified, his personal details will not be processed in the future. A client can always protest against collecting personal details for the purpose of direct marketing and the Company will cease processing the immediately.

**Right to complaint:** if a client decides that processing personal details by the Company violates the current legislation, he has the right to file a complaint to the Commission for personal data protection.

**Right to delete:** in certain circumstances a client has the right to request the Company to delete his personal details. Such examples include cases when the gathered data is no longer required for the purposes it was initially collected; if a client withdraws his consent, supposing that gathering information was based on it; if a client exercise his right of objection; and others.

Please keep in mind that in some instances a client rights might be partially restricted, when there is a legal basis for processing the information, some of them might not be applicable. For example, the Company can modify, limit or delete personal details only to the extent that the Company is permitted by the applicable laws and regulations.

The Company might request further information from a potential client in order to verify client identity. This is an additional security measure in place, which aim is to guarantee that client personal details will not be disclosed to unauthorized third parties, as well as the Company will process the request in a timely manner. The Company will verify and confirm a client rights request free of charge. In certain circumstances, the Company may levy a reasonable administrative fee if a client request is invalid, more frequent or to decline to take any actions.

### **How you can exercise your rights?**

If a client requests to exercise his rights, he can contact the Company by one of the following methods, described below (Contact us section). The Company will provide respond to comments, questions and inquires for a period of one month. In case of necessity, the Company can extend this period with two more months, depending on the complexity and frequency of client requests.

## **7. Contact us**

If a client has certain requests in connection with the processing of personal information, you may contact the responsible person at the Company: BenchMark Finance Jsco, 32, Cherni vruch Blvd., ent. A, Sofia, 1407, Bulgaria or at [dpo@benchmarkcn.com](mailto:dpo@benchmarkcn.com).