

**PRIVACY POLICY
OF BENCHMARK FINANCE**

Please read the information in this document and if you have any questions, please contact us in the manner described in the "Contact Us" section below.

1. Who is administrating your personal data

Your personal data is administered by BenchMark Finance AD, whose registered address is 32, Cherni Vrah Blvd., entrance 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 referred to as the "Company".

2. Why do we need to collect your personal data

If a prospective client decides to open an account in BenchMark Finance, there is a certain personal information that will be required for the identification of the client. 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. Information about experience and knowledge of the client about the investments is collected in order to be provided the most appropriate service for him. Income, property, bank information is collected as well. Additional information may be required in regards to the fulfilment of the statutory obligations for identifying and maintaining data in an up-to-date format 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 deems of interest to a client. In such occasions, the Company processes client's personal data only if the Company has received clients' consent. The client has the right to withdraw his consent at any time. Furthermore, the client may object to the processing of the data for the stated purposes, in which case the Company shall stop the processing immediately.

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. We process your data only insofar as it is necessary for the fulfilment of the purposes described above and in compliance with the principle that this does not affect your rights in a way that would prevail over our legitimate interest. We adhere to the rule that at any time you may object to the processing of data for the purposes specified.

The Company may also collect personal data through the use of "cookies", as set out in the [Cookie Policy](#).

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.

If you contact us to join our affiliate program to respond to your request, we will process your personal information contained therein as necessary. This is done to improve our service so that we can assist you in the most efficient way. In order to respond to you, we may need to further review information in our systems that may contain your personal information collected on another occasion. We may have a contractual or legal obligation to store your request and respond to you. In all other cases, we will do so on the basis of our legitimate interest in processing your request in an adequate and timely manner, which will undoubtedly be covered and your interest will be answered.

3. To whom we can disclose your personal data

The Company does not reveal any personal data, unless its obliged by law to provide certain information. Under extraordinary circumstances, the Company may provide client personal data to competent public authorities and/or supervisor authorities or other person, when this is required from the Company by law. In certain cases, we are required to disclose information: in execution of a judicial, regulatory or other official act or decision; on the basis of an agreement between us and another administrator(s) or processor(s) of personal data, in accordance with the requirements of the applicable law; upon instructions given by the client to a person authorized by the client under the terms of the Trading Agreement. We require all third parties to whom we disclose personal information or who may obtain it on our behalf, to guarantee their confidentiality and to manage them in accordance with legal requirements.

4. How do we protect your personal 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. In certain circumstances, if we are required by a longer statutory storage period, your personal data may be stored for a 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 of erasure (right "to be forgotten"): 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. We will perform actions to satisfy your rights above free of charge, unless your requests are manifestly ill-founded or excessive, in particular because of our repetitive nature - in these cases we may charge a reasonable fee for our administrative costs or refuse to take action.

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 months, depending on the complexity and the frequency of client's requests. The client will be informed about that within the initial one-month period.

7. Contact us

For questions and requests regarding the processing of your personal information, please send them to the attention of our Data Protection Officer, at: BenchMark Finance AD, 1407 Sofia, Cherni Vrah Blvd., entrance A, or by email at dpo@benchmark.bg.