



**globalCHL**<sup>®</sup>  
COMMODITIES HOLDINGS LTD.

# Global Commodities Holdings Privacy Policy

## version 1.4

### - April 2023 -

At Global Commodities Holdings, we take your privacy seriously. This privacy notice tells you what to expect when we collect personal information. It applies to personal information we collect about:

- Individuals whose details have been provided to us by organisations that use our services (including Market Members, subscribers to our Market Reports and Delayed Price Feeds and to licensees under our Product Licensing Agreements) (“Clients”), individuals who have registered on our websites (“Registrants”) and individuals whose details have been provided to us by third-party suppliers (“Suppliers”) – please see the section entitled [Clients, Registrants and Suppliers](#)
- Visitors to our website – please see the section entitled [Visitors to our website](#)
- Job applicants – please see the section entitled [Job applicants](#)

We never buy or sell personal data.

You have various data protection rights – please see the section entitled [Your Rights](#).

## 1. Clients, Registrants and Suppliers

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We control and process personal information submitted by our Clients, Registrants and Suppliers. This consists of personal and/or work contact details and information required for Know Your Customer (KYC) checks.

### 1.1 Why we collect personal information

We only use your personal information for fulfilling a contract with you, when we are legally required to do so, or where it is necessary for one of the following purposes:

- providing the services that you ask for

- providing the services that our Clients ask for
- carrying out the agreements that we have with our Suppliers
- conducting customer research or
- promoting our services to you

The information will be held only for as long as reasonably necessary for us to effectively provide those services or to carry out the agreements with our Suppliers.

## 1.2 Monitoring

When you call us, your calls will be recorded and may be monitored in accordance with our compliance policies. Similarly, we monitor emails and other electronic communications (e.g. instant messenger). We do so as required by our regulators to record information about trades and potential trades, to ensure compliance with the laws and regulations that we are subject to, including those on market abuse, and to improve our service.

## 1.3 Third party service providers

We use a number of third party service providers to enable us to supply our products and services, including document management and trading platform services.

We use third party providers to deliver email communications and surveys to our Clients and Registrants. To deliver these services, these third parties process email addresses under our instruction.

We have contracts in place with each of our data processors which provide that they will not do anything with your personal information unless we have instructed them to do it, that they will not share your personal information with any organisation apart from us and that they will hold it securely and retain it for as long as we ask them to.

Please contact us at [info@commodities.global](mailto:info@commodities.global) if you would like a list of our Third Party Service Providers - each of them has information about its privacy policy on its website.

## 1.4 Marketing

We only send marketing information to those Clients and Registrants who have provided us with their email address, or whose email address has been provided by their employer. You may unsubscribe from marketing emails at any time by clicking on the “unsubscribe” button on an email or by contacting us (more on this in the [Your Rights](#) section).

## 1.5 Transfers outside the EU

We may transfer personal data to our Singapore office in the context of our day-to-day business operations. This transfer of data is necessary for the performance of our contracts with our Clients, Registrants and Suppliers. The information is not transferred outside of Global Commodities Holdings. [Your data rights](#) remain enforceable against us after any such transfer.

Some of our data processors are incorporated or have servers in the USA. The European Commission has recognised the USA as having an adequate system of data protection. Aside from our Singapore office, we will not transfer your data outside of the European Economic Area or the United States of America.

The information that you provide will be held securely by us and our data processors.

## 2. Visitors to our website

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### 2.1 Use of cookies

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

We use cookies in a number of ways, including:

- to allow certain interactive functions to operate (including logging in and submitting forms)
- to ensure that your session is secure when you are logged in
- to collect information about the use of our website and help us improve the site

We do not believe that cookies pose a threat to your personal privacy or online security and we recommend that you set your browser to “allow” cookies. You can set your browser to block or alert you about these cookies. However, some of the cookies we use are essential for the site to work and disabling them may result in preventing some of the site’s functionality.

### 2.2 Google Analytics

We use Google Analytics to collect standard internet log information and details of visitor behaviour patterns. We do this to gather data such as the number of visitors to the various parts of the site. This information is processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website.

You can [opt out](#) of being tracked by Google Analytics across all websites.

### 2.3 Links to other websites

This privacy notice does not cover the links within this site linking to other websites. We encourage you to read the privacy statements on the other websites you visit.

## 3. Job applicants

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All of the information you provide during the recruitment process will only be used to progress your application.

We will not share any of the information you provide during the recruitment process with any third parties for marketing or other purposes or store any of your information outside of the EU, except in our Singapore office when necessary. The information you provide will be held securely by us, whether the information is in electronic or physical format.

If your application is unsuccessful, the information you have provided and that is generated throughout the process, for example interview notes, will be retained for no more than 6 months from the closure of the campaign.

## 4. Your rights

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You have the following rights:

1. The right to be informed about the collection and use of your personal data
2. The right to access your personal data

3. The right to rectify inaccurate or incomplete personal data
4. The right to erase personal data when it is not required
5. The right to restrict processing of personal data
6. The right to object to the processing of your personal data and to object to direct marketing

You can read more about these rights on the [ICO website](#).

## 5. How to contact us

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If you want to exercise any of your rights relating to personal data, including asking for a copy of the personal information that we hold about you, or want to contact us about our privacy policy, you can email us at [info@commodities.global](mailto:info@commodities.global) or write to us at:

The Data Controller  
Global Commodities Holdings Limited  
30 Coleman Street  
London EC2R 5AL

Any changes to our privacy policy will be made by updating this policy on our website.