

Privacy Policy

Trading 212 UK Limited (referred to in this policy as “we” or “us”) is committed to the protection of your personal data and we do not access or use it for any purpose other than in providing, maintaining and improving our services and as otherwise required by law. In order to open and maintain client accounts, we obtain and hold personal information.

This policy outlines how we manage such information to ensure we meet our obligations to respect our clients’ privacy and that all such information remains confidential. These binding obligations derive from the terms of the Retained Regulation (EU) 2016/679 (UK GDPR), the Data Protection Act 2018 (DPA 2018), Privacy and Electronic Communication Regulations 2003 (PECR 2003) and any applicable data protection law as amended from time to time.

Who are we?

Trading 212 UK Limited is the data controller (who is responsible for determining the purpose and manner in which your personal data is used).

We are committed to doing the right thing when it comes to how we collect, use and protect your personal data and is why we’ve developed this privacy and cookies policy (“Policy”), which:

- Sets out the different ways you interact with us and the types of personal data that we collect;
- Explains the reasons why we use the data we collect;
- Explains when and why we will share personal data within the Trading 212 Group (as defined below) and with other organisations; and
- Explains the rights and choices you have when it comes to your personal data.

Information for Trading 212

We may share your personal data within the wider Trading 212 Group (comprising Trading 212 UK Ltd., its sister companies and/or other companies under the same control), who may process your personal data for regulatory, commercial, or other reasons.

Trading 212 UK Ltd. is a company registered in England and Wales (Register number 8590005), Trading 212 UK Ltd. is authorised and regulated by the Financial Conduct Authority (Register number 609146).

Trading 212 UK Ltd.

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What do we mean by personal data?

Personal data is any information relating to you or data that may be used to identify you.

As a client of us you provide us with some of your personal data, which will include your name, telephone number, e-mail address, ID and other documentation as may be requested by us. It may also include IP addresses, device, browser information and other account usage information which in some circumstances may be used to identify you.

What sort of information do we need, and why?

When you access our Website at www.trading212.com, our Platform via the Website or the apps available in the Apple App Store/ Google Play Store (together the “Website”), we may collect personal data about you through you connecting to the platform, signing up to receive information from us, participating in trading, creating an account, contacting us, or other use of our services.

We process the personal data that we received from you as part of the contractual relationship that we have with you or for the purposes of legitimate interests pursued by Trading 212. We may also process data that we have legitimately received from publicly available sources and identification databases. In principle we are obligated or would need your personal data:

1. In the course of establishing and maintaining a contractual relationship, we are obligated to collect personal information from you to enable us to establish and verify your identity. To do this, we will request personal data which includes, but may not be limited to your full name, country of residence, your address, date of birth, nationality, national insurance number/tax ID, email address or other contact information;
2. In order to prevent fraud, we may collect information about your financial status (i.e. income and savings) or other financial information about your professional and employment details, trading history and other personal information;

3. To facilitate your funding and withdrawal requests, we may process your IBAN details and other payment processing information as requested by the respective payment services providers;
4. Your ID card, driving license or passport and other public or private issued documents that can be used as a proof of address (e.g. utility bill, bank statement) or any further documents, photo or video evidence that may be required;
5. To assess the appropriateness of our Services to your circumstances and experience, we may ask for additional information such as, but not limited to, trading experience, employment details, knowledge and experience in financial services and products;
6. We may also collect, and be required to collect and process information about you through your use of this website and our platform. Such information may include, among others, site areas visited, pages viewed, frequency and duration of your visit, the Internet Protocol (IP) address used to connect your computer to the internet, your login information, your geographic location, your browser and browser plug-in type and version, your operating system and platform, and other indirect personal data. Whenever we process such information, we will aim at always using it on an aggregated and anonymised basis;
7. Any other personal information which may be needed to comply with applicable rules; and
8. Any other personal information which may be needed to comply to settle any disputes or mount a legal defense.

How is your personal data collected?

We collect most of this personal data directly from you, by email, chat and/or via our website/platform. However, in some instances:

- We will request this information from you through our application form, and also use our own records and information from other sources for compliance with legal and regulatory obligations; and
- The processing and the storage of your personal data is necessary to provide you with the services described in the Trading 212 Client Agreement and Share Dealing Service Terms of Business and to comply with our regulatory obligations. If you choose not to provide some of the requested information to us, we may not be able to onboard you as a new client or cease services provided under an existing agreement and consequently terminate that agreement as we will not be able to fulfil our contractual and regulatory obligations.

We keep the information as up to date as possible and will change any details, such as your address, promptly when you inform us that they have changed.

Personal data that may be processed by Trading 212 includes any type of electronic communications such as letters, emails, chat messages, telephone conversations, tax identification number and any related tax information, any personal information resulting from the 'Know Your- Customer' and 'Anti Money Laundering' checks carried out by Trading 212 pursuant to the applicable legislation relating to the fight against money laundering and terrorist financing.

Your use of the Website and related mobile applications and online services involves the automated collection of certain types of information, some of which may be considered personal information. This information includes the IP address, browser type and operating system.

In addition, the Website uses a range of cookies to improve and personalise your experience. More information about these can be found in our [Cookies Policy](#).

Why do we need this information and on what legal basis is the data processed?

Lawfulness of processing

We will process your personal data (including collect, use, store and transfer, if applicable):

- i. for the performance of the Trading 212 Client Agreement and/or the Share Dealing Service Terms of Business (together referred to as the "Agreement") concluded between you as a client and Trading 212 and for the provision of the services described in the Agreement or accessed through the Trading 212 platform (the "Services");
- ii. to take steps at your request prior to entering into an Agreement or for opening a demo account for you;
- iii. for compliance with legal and regulatory obligations to which Trading 212 is subject to (including but not limited to the obligations arising under the Financial Services and Markets Act 2000, retained MiFID II, anti-money laundering and countering terrorist financing regulatory obligations, any applicable tax legislation etc.) Examples of such regulatory obligations include, among others: reporting obligations to the FCA and the FSC; providing information to financial crime authorities of suspicious money-laundering transactions or in the context of financial criminal proceedings; providing information to tax authorities. Please note that in order to meet some of the above requirements we may use automated decision making and profiling, whereas you may request human intervention, however, you will not be able to object to such processing;
- iv. In case the processing of personal data is necessary for the purposes of the legitimate interests pursued by Trading 212 - for example, in case we are obliged to provide a reference about you to a public authority or agency to comply with a legal obligation, as well as to ensure that we provide you with the best trading services and information we can and to continue improving our products in your best interest; and
- v. Within the scope of your consent – for example, for marketing and promotional purposes. If you have granted us consent to process your personal data for marketing

purposes, processing will only take place in accordance with the purposes set out in the declaration of consent and to the extent agreed therein. Any consent given may be revoked at any time by you with future effect.

Purposes

Trading 212 will process and analyse your direct personal data (such as your name, date of birth, ID etc.) and indirect personal data (such as analytics and tracking data) in combination with your use of your account for the purposes of:

- i. providing the Services requested by you and carried out in relation to the Agreement;
- ii. verifying your identity, opening and managing your account;
- iii. meeting our regulatory obligations;
- iv. processing your requests related to the Services (deposit and withdrawals, transactions, tax and other information demands);
- v. managing client relationships by means of electronic, telephone or chat communication, entering into and executing transactions with financial instruments;
- vi. opening a demo account with us or having chat or email communication;
- vii. conducting a risk assessment as prescribed by applicable legal provisions by collecting and archiving required documentary evidence regarding your identity; Such assessments may include automated decisions when we, or a reputable third party, is carrying out financial crimes checks;
- viii. conducting a risk management control, data analysis and global supervision of your ongoing needs and enhancing the services offered to you;
- ix. improving and personalising our Services to enhance your trading experience;
- x. providing you with market information that we believe may be relevant to you and send you important account and Services related data by different communication channels, including surveys, in-app notifications, platform messages and emails we think would be of interest to you;
- xi. preventing misuse and fraud, demonstrating business transactions and communications; managing transactions surveillance and monitoring and complying with reporting obligations; managing risks, disputes, complaints, litigation or in the context of prosecution;
- xii. marketing communications with you about updates to our products and services and informing you about any promotions offered by us, as long as it is in our legitimate interest or you have consented to receive such communications and unless you choose to opt-out of them; and
- xiii. providing the services requested by you and carried out in relation to any other agreement between us.

Who are the recipients of your personal data?

Your personal data is received and processed by those employees of Trading 212 that need it for the execution of contractual, legal and regulatory obligations. Further, we may disclose, to

the extent we deem such disclosure or transmission is necessary for satisfying the purposes set out above, to the following recipients:

- i. Other companies within the Trading 212 Group. This data may be transferred in order to allow us to provide a full service to you, where other companies within Trading 212 Group perform components of the full service offering such as financial, IT maintenance or support services;
- ii. Any lawyers, external auditors or advisors, professional consultants, credit reference agencies, notaries, bailiffs, law enforcement agencies, as well as any courts, regulatory, governmental, administrative or other official bodies as agreed or may be required by law, where such disclosure is necessary (i) to comply with any applicable law or regulation; (ii) to enforce applicable terms and conditions or policies; (iii) to protect the security or integrity of our services; and (iv) to protect our rights and interests;
- iii. third-party service providers that provide IT services, advisory and consultancy services, research, marketing services, identity verification checks, banking and payment processing services, insurance or other services to Trading 212, which are only authorised to process your personal data strictly for the purposes of providing these services and in accordance with our instructions. If applicable, we will enter with such third-party service providers into the relevant contractual agreements or the standard data protection clauses that would be required under the relevant data protection laws to ensure compliance with our instructions; and
- iv. third parties as part of mergers and acquisitions provided that the prospective buyer or seller agree to respect your personal data in a manner consistent with our Privacy Policy.

We will require any entity to whom we disclose your information or who may obtain it on our behalf to ensure its confidentiality, and to handle it in line with the legitimate purpose for which they are allowed to access it and in accordance with the applicable data protection laws.

We will not share or sell your information with third parties for their own independent marketing or business purposes without your consent.

Transferring Information Internationally

Personal data may be held at our offices and within Trading 212 Group companies, third party agencies, service providers, representatives, auditors, lawyers and agents as described above. Some of these third parties may be based outside the UK and the EEA.

Under data protection law, we may only transfer your personal data to a country or international organisation outside the UK/EEA where:

- the UK government or, where the EU GDPR applies, the European Commission has decided the particular country or international organisation ensures an adequate level of protection of personal data (known as an 'adequacy decision');

- there are appropriate safeguards in place, together with enforceable rights and effective legal remedies for data subjects; or
- a specific exception applies under data protection law.

Adequacy decision

We may transfer your personal data to certain countries, on the basis of an adequacy decision. The list of countries that benefit from adequacy decisions will change from time to time. We will always seek to rely on an adequacy decision, where one exists.

Other countries we are likely to transfer personal data to do not have the benefit from an adequacy decision. This does not necessarily mean they provide poor protection for personal data, but we must look at alternative grounds for transferring the personal data, such as ensuring appropriate safeguards are in place or relying on an exception, as explained below.

It may be shared with other companies within the Trading 212 Group, processed by staff working for us or for one of our suppliers, located outside the UK and/or the EEA. Such personnel may, for example, be involved in the execution of our support services. We will take all necessary steps to ensure that your personal data is treated securely and in accordance with this Privacy Policy and have adopted appropriate safeguards to protect it.

Transfers with appropriate safeguards

Where there is no adequacy decision, we may transfer your personal data to another country if we are satisfied the transfer complies with data protection law, appropriate safeguards are in place, and enforceable rights and effective legal remedies are available for you, as data subjects.

The safeguards will usually include using legally-approved standard data protection contract clauses. In this way, we make binding arrangements with such third parties so that your information is protected to the same standards as it is in the UK and European Economic Area

How long will your data be stored?

We will process your personal data for the entire duration of the Agreement you have concluded with us and for a period of seven years after the termination of the Agreement to comply with the applicable anti-money laundering legislation and legal safe-keeping obligations. Further, any personal data will not be retained for longer than the time necessary for satisfying the purposes of its processing, subject to the general statutory limitation periods and the mentioned retention

period where the applicable laws require that the personal data is retained for a certain period after the termination of our business relationship with you.

What are your rights regarding your personal data processing?

You have the right to:

- i. access and obtain information about your personal data – you have the right to request what information (if any) we process for you and if so, provide you with information containing your personal data and a copy of that personal data undergoing processing. This is called a Subject Access Request (SAR). You can submit a SAR to us using the link below: <https://helpcentre.trading212.com/hc/en-us/requests/new> or alternatively, by using the details in the 'How to contact us' section below or by directly contacting the DPO officer at **dpo@trading212.co.uk**. Please note, to request information, we will need to verify your identity. If you require additional copies, we may need to charge a reasonable administration fee for requests that we deem are manifestly unfounded. Upon receiving a request from you and/or upon the receipt of the applicable fee, we will acknowledge your request and respond to you within one month from filing your request.
- ii. rectify any factual inaccuracies or incompleteness with respect to your personal data. If the personal data we hold about you is inaccurate or incomplete, you may ask us to correct it. Upon receiving such a request from you, we will acknowledge it and respond to you within one month of filing your request. If we have shared your personal information with others, we will let them know about the rectification where possible.
- iii. request deletion of your personal data - you can ask us to delete or remove your personal data in cases where we no longer need it. However, please note that such request will be satisfied provided that we have no legal obligation to retain such data and will be subject to any retention periods we are required to comply with in accordance with applicable laws and regulations as specified in section "How long will your data be stored" above.
- iv. request restriction of processing - you can ask us to restrict the processing of your personal data in certain circumstances such as where you contest the accuracy of that personal information, for a period enabling Trading 212 to verify the accuracy of your personal data or in case you deem the processing is unlawful. Such an objection may not impede us from storing your personal information though.
- v. object to the processing of personal data by Trading 212 – you can require us to terminate the processing of your personal data, and we will comply with such request in cases where your personal data is processed for the purposes of direct marketing or research (if applicable) or if we are relying on our own legitimate interests to process your data except if we can demonstrate compelling legal grounds for the processing.
- vi. request portability of your personal data - you have the right, when applicable, to receive the personal data you have provided to us in a structured, commonly used and

machine-readable format and to transmit those data to another entity (data controller) of your choice when this is technically possible.

- vii. lodge a complaint with a supervisory authority - you have the right to lodge a complaint regarding our processing of your personal data with your supervisory authority.

Please contact us using the contact details provided below to make a request in respect of your rights. We will use commercially reasonable efforts to respond to your request within 30 days of receiving such a request. If we cannot honour your request within the 30-day period, we will let you know the reasons why and when we expect to be able to fulfill your request.

How do we manage and protect your personal data?

We put a lot of effort into, and apply the highest technical and organisational standards, ensuring that your personal data is secured and kept confidential. Any personal data that you provide to us is stored on secure servers, and we use rigorous procedures to protect against loss, misuse, unauthorised access, alteration, disclosure, or destruction of your personal data. We protect your personal information by maintaining physical, electronic, and procedural safeguards in compliance with the applicable laws and regulations. Part of the measures that we apply to provide a high level of security in terms of personal data management include, among others:

- i. Pseudonymisation – we process your personal data in such a manner that it can no longer be attributed to a specific person without the use of additional information which additional information is kept separately and is subject to specific technical and organisational measures to ensure that the personal data is not attributed to an identified or identifiable natural person;
- ii. Encryption – we apply cryptographic methods which convert certain information or data into a code to make it unreadable for unauthorised users;
- iii. Minimisation – the personal data we demand from you is adequate, relevant and only limited to what is necessary in relation to the purposes for which such data is processed;
- iv. Strict internal control on access to your personal data – access to your personal data is allowed only to those of our employees who need such verification to properly exercise their professional duties;
- v. Penetration testing – we perform regular scanning and penetration testing against our applications and services to identify potential security vulnerabilities and apply the relevant remedies to rectify them; and
- vi. Education - we ensure our employees have the right training to manage your data to ensure it remains confidential and integral.

We maintain security and incident response plans in the event of a physical or technical incident to handle this in a timely manner and limit any negative effect of such an incident. Although we work hard to protect your personal data, we cannot guarantee that our safeguards will prevent every unauthorised attempt to access, use or disclose personal data.

Please recognise that you play a vital role in protecting your own personal data. When registering with our services, it is important to choose a password of sufficient length and complexity, do not reveal this password to any third parties, and to immediately notify us if you become aware of any unauthorised access to/ use of your account. If you believe that any of your account login details have been or might have been exposed, you can change your password at any time through our Website, as well as immediately contacting our customer service team. Given the nature of communications and information processing technology, we cannot guarantee that information, transmitted through the Internet, will be completely safe from intrusion by others.

How will we store your personal data?

Your information will be held on our secure computer systems in the UK and EEA. We have in place systems and procedures to prevent unauthorised access, improper modification or disclosure, misuse or loss of information.

We need to hold your information for seven years after you have provided it to us, even if we no longer have a contractual relationship with you. Once we consider that such information is no longer needed, we will destroy it.

How to contact us and how to complain?

If you have any questions with regard to your rights or the present policy or if you consider that we have failed to respect your confidentiality, you may contact us by:

Phone: +44 203 769 98 97

Email: info@trading212.com

Post: Trading 212 UK Ltd.

107 Cheapside

London EC2V 6DN

We must inform you that we may use video surveillance in our offices and if you visit any of our office premises, you may be subject to video recording. We are also obliged by law to record all our telephone conversations with clients.

You may also contact our Data Protection Officer about any request you have related to your personal data at:

dpo@trading212.co.uk

If you are not satisfied with our responses to your complaint in respect of your personal data, and if you are a client of Trading 212 UK Limited, you have the right to lodge a complaint with the respective supervisory authority. These details are:

the Information Commissioner's Office (ICO) at <https://ico.org.uk/concerns/> or by phone on 0303 123 1113.

Linking to Other Websites

If you access links on the Website to third party websites which are not owned by Trading 212, or if you access the Website through links from other websites, please be aware that these websites have their own privacy policies. We do not accept any responsibility or liability for these privacy policies. You should check and review these privacy policies before you submit any personal data to these websites.

Open Banking

We use a tool provided by TrueLayer Limited (www.truelayer.com) ("TrueLayer") that allows you to send information on your payment accounts to us and other service providers. In order to use our services, you will be asked to agree to their Terms of Service (https://truelayer.com/enduser_tos/) and enter your payment account details with TrueLayer or, for Open Banking connections, you will be redirected to your bank by TrueLayer in order to authenticate yourself. The Terms of Service set out the terms on which you agree to TrueLayer accessing information on your payment accounts for the purposes of transmitting that information to us. We use a tool provided by TrueLayer to initiate payments from your payment account. In order to use our services, you will be asked to consent to the payment via TrueLayer and TrueLayer's terms of service (https://truelayer.com/enduser_tos/) will apply to the payment initiation. TrueLayer's Terms of Service set out the terms on which you agree to TrueLayer initiating a payment from your payment account. TrueLayer is subject to UK and EU data protection laws and is required to treat your data in accordance with those laws, as well as the TrueLayer's Terms of Service and TrueLayer's Privacy Policy (<https://truelayer.com/privacy/>). TrueLayer is authorised by the UK Financial Conduct Authority under the Payment Services Regulations 2017 to provide account information services and payment initiation services (Firm Reference Number: 793171).

We may also use other open banking providers or solutions if they meet the required standards.

Are children allowed to use our services?

The services offered by Trading 212 are not allowed to be used by any person under the age of 18. We do not knowingly collect personal information from children under the age of 18 without the consent of the child's parent or guardian. If you learn that anyone younger than 18 has unlawfully provided us with personal data, please contact us, and we will take steps to delete such information.

Changes to This Privacy Policy

We may change this Privacy Policy from time to time by posting the updated version on our Website. Laws, regulations and industry standards evolve, which may make those changes necessary, or we may make changes to our business. We advise you to review this page regularly to stay informed and to make sure that you are happy with any changes. If the changes are significant, we will provide you with a more prominent notice such as an email notification or through the Services. If you disagree with the changes to this Privacy Policy, you should discontinue your use of the Website or related Services. If we change this Privacy Policy in a way that will affect how we use your personal data, we will advise you of the choices you may have as a result of those changes.

Leading version

This Policy can be translated into different languages. If there are any inconsistencies between different language versions, the English language version shall prevail.

Last updated: January 2022