



Data Privacy Policy

12/02/2025

V1.1

Document Information

Name of Policy	Data Privacy Policy
-----------------------	---------------------

Document Location

This document is stored on the BancTrust website.

Document History

Author	Date	Version	Comment
CCO	December 2021	1.0	New Policy
CCO (Interim) / MLRO	February 2025	1.1	Annual Review Updates to Contact Details

Contents

1. Our Contact Details..... 4

2. About Us..... 4

3. Purpose 4

4. Type of Information held by BancTrust..... 4

5. How we check your identity and use your personal data 5

6. Disclosures of your personal data 5

7. Data Security..... 6

8. Data Retention 6

9. Your Data Protection Rights 6

10. How to Complain..... 6

1. Our Contact Details

Name: BancTrust Investment Bank Limited

Address: 8 Bishopsgate, Level 36, London EC2N 4BQ

Phone Number: +44 20 8161 2010

E-mail: info@banctrust.co.uk

2. About Us

BancTrust Investment Bank Limited (which operates under the trading name BancTrust & Co, collectively referred to as “BancTrust”) is a boutique investment bank and focuses on fixed income trading, investment banking, securities trading, market research and investment advisory products and services to a select base of corporate and institutional clients. These are mainly comprised of multinationals, financial institutions, asset managers and public sector entities investing in, or operating within, Emerging Markets.

3. Purpose

This privacy policy aims to give you information on how BancTrust and any associated companies may use, collect and process your personal data, including any data you may provide through our website, when you purchase a product or service from us.

4. Types of Information held by BancTrust

As part of our day-to-day business, BancTrust needs to collect personal information from our clients and potential clients to ensure that we can meet their needs for a range of financial services and provide them with information about our services. Your privacy is important to us, and we are committed to protecting your confidential information and personal data.

Personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed. We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

Identity Data includes first name, last name, username or similar identifier, marital status, title, date of birth and gender.

Contact Data includes billing address, delivery address, email address and telephone numbers.

Financial Data includes bank account and payment card details.

Transaction Data includes details about your trading account, account history, activity, orders, payments to and from you and other details of products and services you have purchased from us.

Technical Data includes information about your use of our facilities, internet protocol address, your login data, browser type and version, time zone setting and location, operating system and platform and other technology on the devices you use to access our website or system.

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.

5. How We Check Your Identity and Use Your Personal Data

To comply with money laundering regulations, we need to confirm the name and address of our clients. We may ask you to provide physical forms of identity verification when you open your account. Alternatively, we may use a credit reference agency to verify your identity.

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

- Where we need to perform the contract, we are about to enter into or have entered into with you.
- 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.

6. Disclosures of Your Personal Data

We may have to share your personal data with the parties set out below:

- The Financial Conduct Authority and any other regulatory authority we may be subject to
- For the purpose of demonstrating compliance with applicable laws and regulations.
- Such third parties as we reasonably consider necessary to prevent crime, e.g. the Police.
- Our associated companies for the purpose of opening and administering your trading account and orders, providing trading and/or clearing services to you.
- Where reasonably necessary, to any third-party service providers who provide us with administrative, financial, research or other services in connection with the services we provide to you.
- Our auditors for the purposes of carrying out financial and regulatory audits.
- Our agents carrying out such credit and identity checks, including money laundering checks, compliance regulatory reporting and fraud prevention checks, as we may reasonably consider necessary or desirable. Any third party referred to in this clause may share any personal information concerning you with us and other organisations involved in credit reference checking, the prevention of fraud and/or crime and/or money laundering or for similar purposes or to recover debts involved.
- Introducing brokers, liquidity providers, prime brokers, clearing and settlement agents, and trade repositories, as applicable.
- Courts, tribunals and regulatory authorities as agreed or authorised by law to enable us to enforce our agreement with you, comply with the requirements of a court, regulator or government agency.

- Anyone else authorised by you.

We require all third parties to respect the security of your personal data and to respect your right to privacy and comply with the data protection principles and this policy.

7. Data Security

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.

8. Data Retention

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.

9. Your Data Protection Rights

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information.

Your right to rectification - You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your information in certain circumstances.

Your right to object to processing - You have the right to object to the processing of your personal data in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us if you wish to make a request.

10. How to Make a Complaint

A complaint can be made to the Information Commissioner's Office ("ICO") if you are unhappy with how we have used your data. Please see the ICO's website for further details on how to contact them, or alternatively, see the address below.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113