

Privacy Policy

OUR COMMITMENT

We at Pure FX are committed to ensuring that we manage your personal data professionally and in compliance with all applicable data protection laws, including the General Data Protection Regulations (“GDPRs”) applicable from 25th May 2018.

What is this policy about?

We have produced this privacy policy so that you understand:

- who we are
- what personal data we are processing
- what processing we do and why we do it (including the legal basis for it)
- how long we might keep it and why
- with whom we might share it
- any sharing that might happen outside of the EEA (the European Economic Area);
- how we keep your data safe
- your rights, including how to make a complaint.

What is my personal data?

Your personal data is any information relating to you if you are a natural person. It includes things like your name, address, telephone number and email. It can also include things like your date of birth, relationships and financial information, such as your credit history. It does not include information about companies.

What is processing?

Processing means just about anything we do with the personal data which we have about you, including collecting, recording, using, storing or sharing it with others. For example, we process personal data so we can answer your queries and provide you with our products and services. We might get this information from you or we might get it from others.

ABOUT PURE FX

We are Pure FX Limited.

We can be found at McBride House, 32 Penn Road, Beaconsfield, Buckinghamshire HP9 2FY. This is also our registered office address. In this privacy policy we sometimes refer to Pure FX Limited as “we”, “us”, “our” or “Pure FX” (which is also our trading name). We provide foreign exchange and related money transfer services.

We are authorised as a payment institution and regulated by the Financial Conduct Authority (FCA) for the purposes of providing payment services. We are registered with HM Revenue & Customs (HMRC) as a money services business.

Where you provide us with your personal data, such as where you have a query, ask for an exchange rate quote, register with us or ask us to perform a transaction for you, we will be responsible to you as a “controller” in accordance with data protection law.

WHAT PERSONAL DATA ARE WE PROCESSING?

The sort of personal data which we collect might include:

- Your full name, title, email address or telephone number (such as where you subscribe to our newsletter, request a rate alert or call back, or make any enquiry about our products and services)
- Your full name, title, email and/or web address or telephone number, and reason for your transfer (such as where you request an exchange rate quote)
- Your full name, title, gender, current home address, previous home address, email address, home and/or mobile telephone numbers, date of birth, nationality and occupation (such as where you register with us for our foreign exchange and money transfer service)
- The same or similar information to the above relating to any joint account holder with you on an account, including the relationship between you and any joint account holder
- Information about the intended recipient (or “beneficiary”) of any money transfer (such as their name, address, date of birth, nationality, occupation, account number and their connection with you or the joint account holder)
- Other transaction related information, such as other information about the trade you want us to make, the amount and currencies involved, when you want us to make it and where you want any money to be sent
- Any other information which you decide to tell us (such as when you make an enquiry or complete a comment box on our website or when one of our dealers speaks with you).

Where we deal with enquiries from or provide products and services to a business, we may collect similar information but only that which relates to natural persons (such as that information relating to any director, partner, trustee or shareholder of, or any named contact or authorised person at, the business but not any other information) is considered personal data.

WHAT PROCESSING ARE WE DOING AND WHY?

We may process personal data:

so we can take pre-contract steps at your request or perform our contract with you, including

- to respond to your enquiries concerning our products, services, and rates
- to contact you or call you back when you ask us to do so
- to provide you with an estimate or quotation
- to provide you with rate alerts and inform you of favourable rates
- to keep track of your currency pairs
- to register you and any joint account holder as a Pure FX customer
- to perform Pure FX customer on-boarding
- for the purposes of acceptance of our terms and conditions
- to understand and record the transaction a Pure FX customer wishes to make
- to enable performance of the transaction and provide confirmation of its performance.

to comply with a legal obligation on us or perform a task in the public interest, including

- to meet requirements imposed on us by, and to respond to notices and requests we receive from our regulator the Financial Conduct Authority or HM Revenue & Customs, or their replacements.
- to perform checks for the purposes of crime and fraud prevention, including for anti-money laundering purposes, such as client due diligence, identification and verification, source of wealth, sanctions and PEP checks and clearances

- to meet the requirements of data protection law, and to respond to notices and requests we receive from, the Office of the Information Commissioner (ICO) or any other national or supra-national authority with the same or similar responsibilities
- to enable us to carry out enquiries of and reporting to, and to co-operate in any investigations by, the National Crime Agency (NCA), HMRC, HM Treasury and the Office of Financial Sanctions Implementation (OFSI)
- in connection with any court order or police warrant or investigation.

for our legitimate interests or those of a third party, including

- to respond to your queries
- to contact you or call you back when you ask us to do so
- to provide you with rate alerts and inform you of favourable rates
- to keep track of your currency pairs
- to record your trades, requirements and preferences
- to provide you with free insight and our newsletter
- to better understand you and your needs
- to provide you with information about our products and services, and our related products and services.
- to enable you to provide us with your feedback on our products and services, and any transaction we perform for you, including any follow up action (which might include contacting you or speaking with our dealer)
- to qualify our leads and check the notifications we receive from our website
- to enable us to respond to leads we receive via our affiliates at your request, including any follow up action (which might include contacting you or the related affiliate)
- to help us to optimise our products, services, performance and ratings
- to enable us to respond in the case of any complaint or dispute, and to take legal advice and prosecute or defend any claims
- to enable us to respond to enquiries from our regulator, the Financial Conduct Authority (FCA), and from other relevant government agencies and authorities, including the National Crime Agency (NCA), HM Revenue & Customs, HM Treasury, the Office of Financial Sanctions Implementation (OFSI), the Police, the Office of the Information Commissioner (ICO) and any replacement or equivalent national or supra-national authority, and for them to perform their duties and responsibilities
- in connection with a corporate restructuring, re-organisation or sale of our business or assets.
- to enable us to provide our products and services to you, continuously, safely and securely

We may also further process your personal data for any purpose compatible with the above, including:

- for internal compliance reasons, including to conform with regulation and policy
- to provide staff training
- to calculate and pay any transaction related charges, costs, fees or commissions
- for market research and statistical analysis, including to qualify and keep records of our leads
- in connection with the use and hosting of our email and of our website
- in connection with our website, application, network and infrastructure support, maintenance and improvement

- for other internal recording, management and administration purposes
- to protect the security and integrity of our business operations
- for business continuity reasons, including for the purposes of electronic back up
- for storage, archiving and retrieval.

We may record texts, emails or telephone calls, including for training purposes, customer service, quality control, performance improvement, to verify any comments you or any of our dealers may make during any conversation, for regulatory purposes and for the purposes of fraud or crime prevention and detection.

We have CCTV in operation on site and, should you visit our premises, it is possible that images of you may be recorded.

If you have been referred to us by one of our affiliates (such as an estate agent who you are dealing with abroad and who you have asked to contact us on your behalf or where you have contacted us directly via their website) we may use your personal data to make initial contact with you. In such circumstances and for such purposes, we may only be a processor under data protection law and the affiliate will be the controller according to data protection law applicable in their own jurisdiction. Should you have any query concerning our handling of your personal data we collect in these circumstances, please contact the affiliate directly.

Consent

Consent is also a lawful basis for our processing of personal data and so, sometimes, we may ask for your permission (called “consent” in the legislation) to process your personal data.

Where this is the case, we will make this clear together with how we might use your personal data should you allow us to do so. If, at the time we ask for it, you choose not to provide us with the requested information or do not consent, then we will not use it in that way.

Even if you do give us permission to use it in that way, you can always withdraw your consent to us doing so at any time. This does not affect the lawfulness of our previous same use of that information with your permission but we will then stop using it in that way.

You can contact us at any time on enquiries@purefx.co.uk, +44 (0) 1494 671800, or Pure FX, McBride House, 32 Penn Road, Beaconsfield, Bucks, HP9 2FY, to tell us you wish to withdraw your consent. We may also provide you with other ways for you to withdraw your consent to make it easier for you, such as by an unsubscribe button or other electronic means to alter your preferences.

Please note that if you choose not to give us permission or if you withdraw your consent, this may affect service quality and performance. We may also have to stop providing you with certain services.

Provision of “optional” information

On our website, we may indicate where the provision of any information by you is optional.

If this is the case, it is up to you whether you want to provide us with this information. If you choose not to provide us with optional information this may affect service quality and performance.

If you do provide us with it, we rely on our legitimate interests to process this information rather than your consent. This may be to help us to better understand you, provide you with a better service, or to assist us with our risk assessment or compliance processes.

If you choose not to provide us with information in a “required” field, then we may not be able to respond to your request or provide you with the products or services concerned.

Direct marketing

We may carry out direct marketing to you about our products and services. If we do, this is on the basis of our legitimate interests and you have the right to object to our further use of your information for direct marketing by us at any time. If you object then we will then stop doing so.

You can contact us at any time on enquiries@purefx.co.uk, +44 (0) 1494 671800, or Pure FX, McBride House, 32 Penn Road, Beaconsfield, Bucks, HP9 2FY, to tell us you wish to object. We may also provide you with other ways for you to object to make it easier for you, such as by an unsubscribe button or other electronic means to alter your preferences.

Please note that if you choose to object to direct marketing, this may affect service quality and performance. We may also have to stop providing you with certain services.

We do not pass on any personal data to third parties for the purposes of any direct marketing by them.

Special category personal data

We will not normally process data which the GDPRs describe as “special category” personal data but if we do, we will process it based on your consent, for the establishment, exercise or defence of legal claims or for reasons of substantial public interest on the basis of EU or other law applicable in the United Kingdom.

STORING PERSONAL DATA

We use the following criteria to determine how long we retain personal data:

We retain personal data

- for as long as necessary to deal with queries and to fulfil our obligations to our customers, including contract performance.
- for as long as legal claims might be brought against us or we might need to bring legal claims. This includes after we have performed our contractual obligations and after your account or our service has come to an end.
- for as long as necessary to meet legal and regulatory requirements. This includes after we have performed our contractual obligations and after your account has closed or our service has come to an end.

Third parties with whom we share personal data will adopt their own criteria.

HOW WE SHARE PERSONAL DATA

Who do we share personal data with?

We may share personal data with:

- our third-party service providers for the purposes of providing services and support to us or helping us to provide our products and services to you, including:
- to help us respond to your enquiries
- to help us provide you with our newsletters and rate alerts
- to help us provide you with quotations

- to facilitate customer registration and on-boarding
- for the purposes of carrying out risk assessment, due diligence and legal checks, such as anti-money laundering, sanctions and PEP checks and clearances
- in order to make payments
- to enable our customers to provide us with their feedback
- in connection with the use and hosting of our email and of our website
- in connection with our website, application, network and infrastructure support, maintenance and improvement
- relating to the provision of network and system integrity and security
- relating to the provision of electronic back up
- for the purposes of archiving
- for the purposes of call recording
- recipient banks, so that payments can be received
- any subcontractors we may use to help us to provide our products and services
- our affiliates (such as an estate agent who you are dealing with abroad and who you have asked to contact us on your behalf or whose website you have visited to make contact with us directly)
- our legal and professional advisers, including our auditors, for the purposes of legal advice and auditing
- our regulator, the Financial Conduct Authority (FCA) or its replacement
- other relevant government agencies and authorities, including the National Crime Agency (NCA), HMRC, HM Treasury, the Office of Financial Sanctions Implementation (OFSI), the Police, the Office of the Information Commissioner (ICO) and any replacement or equivalent national or supra-national authority
- the courts, to comply with legal obligations and for the administration of justice
- anyone else where you have asked us to do so, we have your consent or where we have to do so by law.

Sharing outside of the EEA (“European Economic Area”)

We need to let you know if we intend to share your personal data outside of the EEA (or “European Economic Area”, which is all the member states of the European Union, together with Norway, Iceland and Lichtenstein). This is because, while some countries may have adequate protections in place for the protection of personal data, other countries do not.

In most cases your personal data is processed by us or our third party services providers on our behalf in the United Kingdom or the EEA but in certain circumstances we or they will transfer personal data to countries outside of the EEA. In each such case, we will ensure that either the destination country meets the requirements of adequacy laid down in the legislation and by the European Commission or that other appropriate safeguards are put in place, such as by means of a detailed contract between us and the entity based in that destination country or storing its data there.

For example, some of the third party service providers we use to help us to provide you with our products and services use servers which are based in the US. All of them operate through businesses that are signatories to the US Privacy Shield, which is a system that is EU approved and meets the adequacy requirements laid down in the legislation and by the European Commission. Further detail concerning the US Privacy Shield can be found here www.privacyshield.gov and concerning

adequacy can be found here https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en.

Where you instruct us to share your personal data with people who you have asked us to deal with, or who you already know, or who already know you, wherever they are based, this will be on the basis of your consent and we will not normally make any further enquiry concerning them or take any further steps to ensure that your personal data is protected.

YOUR RIGHTS

Rights of request

If you are the “data subject” (which means the natural person to whom the personal data relates – you do not have these rights in relation to any personal data concerning anyone else) you have the following rights of request relating to your personal data:

- **Access:** You can ask us for confirmation of whether your personal data is being processed and for a copy of your personal data undergoing processing, provided the provision of it does not adversely affect the rights and freedoms of others.
- **Rectification:** You can ask us to correct the personal data we hold about you if it is inaccurate or incomplete.
- **Erasure:** You can ask us to erase the personal data we hold about you, for example, on grounds that it isn't necessary for us to process it any more for the purposes for which it was collected or because it is being processed unlawfully.
- **Objection:** You can object to further use of your personal data where we are relying on legitimate interests as the reason for the processing of the data.
- **Restriction:** You can ask us to no longer process your personal data for certain purposes for a period of time, for example, where you contest the accuracy of the personal data we hold, or the lawfulness of its processing or you have objected to its processing on legitimate interests grounds. We will still be entitled to store the data.
- **Portability:** You can ask us to facilitate the transfer of your data to a replacement service provider if relevant and where practicable.

You should direct any request to: enquiries@purefx.co.uk, +44 (0) 1494 671800, or Pure FX, McBride House, 32 Penn Road, Beaconsfield, Bucks, HP9 2FY

Please note that we may not be able to do exactly what you have asked or there may be other steps which you or we need to take before we are able to, or can determine whether we can, meet your request. Generally, we will respond to your request either with the action we have taken, or explaining why we will not be taking action, within one month of the receipt of your request. However, sometimes we may have to extend that period and, if this is the case, we will let you know.

Direct marketing

You can ask us to stop any direct marketing to you at any time. Where we send any direct marketing to you by email we will make sure that a way to unsubscribe or change your marketing preferences is included in the email. Alternatively, you can contact us at any time on enquiries@purefx.co.uk, +44 (0) 1494 671800, or Pure FX, McBride House, 32 Penn Road, Beaconsfield, Bucks, HP9 2FY.

Consent

You can withdraw your consent where we have relied upon your permission to perform any processing at any time. You can contact us at any time on enquiries@purefx.co.uk, +44 (0) 1494 671800, or Pure FX, McBride House, 32 Penn Road, Beaconsfield, Bucks, HP9 2FY, to tell us you wish to withdraw your consent. We may also provide you with other ways for you to withdraw your consent to make it easier for you, such as by an unsubscribe button or other electronic means to alter your preferences.

Complaints

You always have the right to complain to the Office of the Information Commissioner, which is the supervisory authority in relation to data protection law and its enforcement in the United Kingdom. You may also be entitled to seek compensation in certain circumstances where a breach of the legal requirements for the protection of personal data has occurred.

Further information

Further details concerning the ICO, its powers and your rights, including your right and how to bring a complaint to the ICO, can be found here [ICO](#).

WHAT ABOUT COOKIES?

A cookie is a small text file which is placed onto your computer (or other electronic device) when you visit our website. You can set your browser not to accept cookies, however some of our website features may not function as a result. We have a separate Cookies Policy which goes into more detail. You can find this here: <https://www.purefx.co.uk/cookie-policy/>

WHERE CAN I FIND OUT MORE?

We hope that you find this Privacy Policy helpful.

If you have any questions, please contact our Compliance Team on enquiries@purefx.co.uk, +44 (0) 1494 671800, or Pure FX, McBride House, 32 Penn Road, Beaconsfield, Bucks, HP9 2FY.

You can also visit the ICO website at [ICO](#).

Further detail concerning the US Privacy Shield can be found here www.privacyshield.gov and concerning adequacy can be found here https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en.

Please note that we may update our privacy policy by posting a new version on our website and/or providing you with other notice of any specific changes. We recommend you check our website periodically for any changes which may affect you.

Last updated [25 May 2018]