



StoneX Canada Privacy Notice

Who we are

This privacy notice is issued by StoneX Payment Services Ltd. ('StoneX, 'we', 'us' or 'our') and describes how we collect, use, disclose and protect personal information in connection with our provision of services in Canada.

We are committed to protecting the privacy and maintaining the security of any personal information that we hold about you.

If our privacy notice changes, we will place an updated version on our website. Please check this privacy notice regularly. Subject to applicable law, all changes will take effect as soon as we publish the updated privacy notice.

The purpose of this notice

The purpose of this notice is to explain to you what personal information we collect and how we may use it. This notice applies to you if you are a representative of one of our institutional clients in Canada (such as an employee, officer, principal, director, beneficial owner or trustee).

We are the controller of any personal information which you provide to us which means that we decide the purposes and means of the processing of that personal information.

This privacy notice should be read together with any other privacy notice we may provide on specific occasions. This privacy notice supplements such other notices and is not intended to supersede them unless otherwise specified.

What types of personal information we collect

Personal information is any information that relates to an identified or identifiable individual. It does not include data which has been anonymised.

We may collect, use, store and transfer different kinds of personal information about you depending on our relationship with you and the services that we provide to you including:

- **Identity Data** includes first name, last name, username or similar identifier, title or position, date of birth, and any other information we may require to verify your identity and carry out anti money laundering checks.
- **Contact Data** includes email address, postal address, and telephone numbers.
- **Technical Data** includes your internet protocol (IP) address, cookie ID, Google 360 ID, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other information relating to the devices you use to access our services and the technology on those devices.

- **Profile Data** includes your username and password.
- **Usage Data** includes information about how you use our products, and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and how you interact with our communications.

We may also collect, use and share aggregated data such as statistical or demographic data for any purpose. This aggregated data may be derived from your personal information but is not considered personal information because it is anonymised and cannot be related or traced back to you.

How we obtain and store your information

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your personal information by filling in forms or by corresponding with us .
- **Automated technologies or interactions.** As you interact with our services, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal information by using cookies, server logs and other similar technologies.
Third parties or publicly available sources. We may receive personal information about you from the institutional client you represent, from identity verification providers, and from public sources such as corporate entity registers and sanctions lists.
- **Monitoring.** To the extent permitted and/or required by applicable law, we may monitor or record phone calls with you and monitor (and maintain a record of) all emails or other communications, for the purposes of record-keeping, training and quality assurance.

How we use your information

We use your personal information to:

- verify your identity and perform anti-money laundering, terrorism prevention and sanctions screening checks;
- resolve and investigate complaints and carry out investigations or litigation;
- perform the services or supply the products or information you or the institutional client you represent have agreed to receive from us;



- to provide you with marketing and promotional information that we believe may be of interest to you;
- manage our relationship with you and maintain contact with you and/or the institutional client you represent;
- carry out our internal business purposes which may include business and disaster recovery, document retention/storage, IT service continuity (e.g. back-ups and helpdesk assistance) and similar purposes to ensure the quality of the services we provide to you;
- evaluate or perform corporate transactions;
- keep our records updated and study how customers use our products/services;
- develop our products and services, grow our business and inform our marketing strategy; and
- answer your queries or addressing any complaints or claims

Third Party links

Our services may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our services, we encourage you to read the privacy notice of every website you visit

Sharing of your information

Third parties

We may share your personal information with third parties if we are under a duty to disclose or share your personal information in order to comply with any legal, regulatory or tax obligation, or in order to enforce or apply our agreements with you, or to protect the rights, property, or safety of us, our customers, or others..

We share your personal information with service providers (including group entities acting in this capacity) that perform services on our behalf including in relation to the following types of activity: legal advice, audits, financial, research, administration, IT services or other services in connection with the services we provide to you or the institutional client you represent. Some of our service providers and group entities are located outside of Canada, including in the United States and the United Kingdom. As a result, your personal information may be processed and stored outside of Canada for the purposes described in this notice.

We may share your personal information with potential buyers and professional advisers in the context of the possible sale or restructuring of the business for the purposes of evaluating or completing the transaction. If the transaction proceeds, your personal information may be

transferred to the buyer to use for similar purposes which your information was originally collected for. We may also need to share your personal information with a regulator or to otherwise comply with the law.

Group entities

We may share your personal information with other entities in our group in providing current or new services to you, as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, in order to comply with any legal, regulatory or tax obligation, or to protect the rights, property, or safety of us, our customers and for system maintenance support and hosting of data.

Data Security

Personal information is maintained on our servers or those of our service providers. We have put in place appropriate security measures designed to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. Despite these measures, there remains a risk that your personal information may be accessed, used or disclosed without authorization.

How long will we keep your information for?

We will retain your personal information for the duration of our relationship with the institutional client and typically for no longer than 10 years after that relationship has ended. In some circumstances, it may be necessary to keep your information for longer than this period, in order to fulfil the purposes we collected it for, or for the purposes of satisfying any legal, accounting, or reporting requirements.

In some circumstances we may anonymise your personal information (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Where we consider there to be a risk that we may need to defend or bring legal claims, we may retain your personal information as necessary to ensure that we can properly bring or defend legal claims. We may also need to share this information with our regulators, insurers or legal advisers as the case may be. How long we keep this information for will depend on the nature of the claim and how long we consider there to be a risk that we will need to defend or bring a claim.

Your rights

Data protection laws give you a number of rights when it comes to personal information we hold about you. These rights are:

- The right to request access to or correction of your personal information.
- The right to receive information about how your personal information has been processed by us.



- The right to withdraw your consent to our procession of your personal information.

In some cases, you may also have the right to request deletion of your personal information, or that we transfer your personal information to another organization.

These rights are subject to contractual and legal restrictions. To exercise any of these rights, please contact us as described in the Contact Details section below. We may take reasonable steps to verify your identity before responding to your request.

Contact Details

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact our Privacy Officer Robert Vetter at Robert.Vetter@stonex.com.

Updated: October 2022