

# **ETS Markets Limited – Privacy Notice**

## **Introduction**

This Privacy Notice covers ETS Markets Limited “ETS Markets”

ETS Markets is committed to protecting your personal information and ensuring that it is used fairly and responsibly. This notice sets out what personal information ETS Markets will collect about you and how we will use this information.

## **Information that we collect about you**

We will collect information about you to provide you with advice and our services. We collect information about you when you:

- Sign up via our website or by email to receive market updates
- Receive regular ongoing services
- Complete Know Your Customer (“KYC”) forms

The type of personal information we collect about you will depend on the purpose for which it is collected and will typically include:

- Your name and contact details
- Information to verify your identity, for anti-money laundering purposes

We will only collect personal information necessary and relevant to our services and the contractual obligations with you.

## **Why do we need to collect and use your personal data?**

The primary basis that we intend to use your data is to provide relevant carbon and energy market updates and to set up trading relationships with selected counterparties.

The information that we collect about you is essential for us to be able to carry out the services that you require from us. Without collecting your personal data we would also be unable to fulfil our legal and regulatory obligations.

## **How we use your personal information**

The personal information about you that we have collected will be used to:

- Provide carbon and energy market updates
- Complete KYC application forms
- Meet our regulatory and legal obligations.

## **With whom might we share your information?**

We will share personal information with third parties (such as carbon trading counterparties, energy suppliers and other consultants) who need to be involved for the provision of our services to you.

Where third parties are involved in processing your data, we have ensured that they understand the nature and purpose of the processing and that this is clear; that they are subject to a duty of confidence in processing your data; and that they will only act in accordance with our written instructions.

## **Data security**

ETS Markets has a robust Data Security policy in place, which sets down strict rules across the company on how we handle client data and protect this. Where it is necessary for your personal data to be forwarded to a third party we will use appropriate security measures to protect your personal data in transit.

The largest proportion of client our data is stored electronically, however where this is stored on paper, there are data security procedures in place to safeguard these documents equally.

The review of our Data Security policy is continuous so that we always strive to update our procedures and to work proactively to protect client data.

## **How long do we keep hold of your information?**

During the course of our relationship with you we will retain personal data, which is necessary to provide services to you. We will take all reasonable steps to keep your personal data up to date throughout our relationship. We are subject to regulatory requirements to retain your data for specified minimum periods, depending on the type of contract and/or advice.

## **Your rights**

You have the right to:

- Request deletion of your personal data. We will comply with this request, subject to the restrictions of our regulatory obligations and legitimate interests.
- Request a copy of the personal information that we have about you. If you would like a copy of some or all of your personal information please email or write to us using the contact details noted below.
- Ask us to update or correct your personal information, subject to certain requirements, for example proof of ID to amend the spelling of your name.
- Ask that we restrict the processing of your personal information where appropriate.

- When your personal data is processed by automated means you have the right to ask us to move your personal data to another organisation for their use. We have an obligation to ensure that your personal information is accurate and up to date.

## **Marketing**

If you currently receive the ETS Markets Carbon Report and other related communications as part of your service agreement with us, we will continue to send you these. The Carbon Report provides information about EU ETS policy, carbon market updates and other energy news. It contains articles with generic information, i.e. it does not include reference to personal information or circumstances.

We may email you about other products or services that we think may be of interest to you. We will never share your information for marketing purposes with companies outside our group without your prior consent.

You have a right at any time to stop us from contacting you for marketing purposes. If you no longer wish to be contacted for marketing purposes, please let us know via the contact details below.

Please note that this excludes the email correspondence that you have previously consented to, which we use for correspondence in order to service your contract, for example emailing you an application form or trading contract.

## **Our website**

The ETS Markets website can be found at [www.etsmarkets.com](http://www.etsmarkets.com)

Our website contains links to other websites. This privacy policy only applies to our website so when you link to other websites you should read their own privacy policies.

We do not use cookies on our website, however when someone visits our website we use a third party service to collect standard internet log information and statistics. We do not retain any personal data from this process.

If you are unhappy with how your personal data is processed

You also have a right to lodge a complaint with the supervisory authority for data protection. In the UK this is:

Information Commissioner's Office

<https://ico.org.uk>

0303 123 1113 (local rate)

## **Changes to our privacy policy**

We keep our privacy policy under regular review and we will place any updates on this web page (and/or) inform you of any changes when they occur. This privacy policy was last updated on 22 May 2018.

## **How to contact us**

Please contact us if you have any questions about our privacy policy or the information we hold about you:

The Data Protection Manager  
ETS Markets Limited  
48 Arwenack St, Falmouth TR11 3JH  
Tel: 01326 567403  
Email: [info@etsmarkets.com](mailto:info@etsmarkets.com)