



FORTE SECURITIES Ltd
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United Kingdom

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Email info@fortsecurities.com
www.fortsecurities.com

Privacy Notice (UK)

Definitions

Affiliate means any affiliated (or associated) company as defined in the FCA Handbook of rules and guidance.

Client for the purpose of this Privacy Notice, the term '**Client**' means existing, past and prospective clients

Controller (aka Data Controller) means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the **processing** of personal data, as defined by Data Protection Act 2018 (meaning of "controller").

Data Protection Laws means:

- i UK Data Protection Act 2018;
- ii UK GDPR;
- iii Regulation (EU) 2016/679 on the protection of natural persons with regard to the Processing of personal data and on the free movement of such data; and
- iv any other applicable laws and regulations relating to, or impacting on, the Processing of Personal Data

Personal Data (aka Personally Identifiable Information (PII)), means any information relating to an identified or identifiable living natural person (the '**data subject**'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. This includes data and other information which is in the possession of (or likely to come into the possession of) the **Controller**.

Processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Processor (aka Data Processor) means a natural or legal person, public authority, agency or other body which processes **personal data** on behalf of the **Controller**

Special Categories of Personal Data means **personal data** revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

Other definitions used in this Notice shall have the meanings ascribed to them in the Terms of Business and/or the relevant applicable regulations as appropriate.



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Who We Are

Forte Securities Limited (FSL) is an FCA authorised and regulated (reference number 478424) inter-dealer broker based in London, offering institutional and corporate clients a full range of investment brokerage services and operating an Organised Trading Facility (FSL OTF).

FSL is located at:

4th Floor,
36 Golden Square,
London W1F 9EE
United Kingdom

With UK company registration number 06498357.

Introduction

FSL is committed to meeting its contractual, statutory and regulatory obligations and ensuring that client personal data is handled in accordance with the Data Protection Laws. This notice describes how FSL collects and uses your personal data, the rights you have and the control you can exercise in relation to it.

Scope

This Privacy Notice applies to all clients. However, the personal data that FSL processes will vary depending on the client's specific status and personal circumstances. It applies to any products and services supplied by FSL either directly or via a web site to its clients.

For the purpose of this Notice and under our Terms of Business, FSL is a “**Controller**” and is required under Data Protection Laws to notify all clients of the information contained in this Privacy Notice.

This Notice constitutes an integral part of our Terms of Business or any other contractual arrangement FSL may have with the clients from time to time. By accepting our Terms of Business or entering into another contract with FSL, the clients acknowledges and agrees with this Notice.

Purpose

This Privacy Notice describes how FSL collects, uses, shares or otherwise processes client personal data as a Controller in the course of business operations and how a client may exercise their rights in relation to the processing of that personal data before, during and after a working relationship with FSL in accordance with Data Protection Laws.

Data Protection Principles

Data Protection Laws states that any personal data that FSL holds about its clients must be:

1. Processed lawfully, fairly and in a transparent way.
2. Collected only for purposes that FSL has clearly defined and not used in any way that is incompatible with those purposes.
3. Relevant to the defined purposes and limited only to those purposes.
4. Accurate and kept up to date.



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5. Kept only as long as necessary for the defined purposes.
6. Kept securely.

Why FSL Needs to Collect, Use and Process Client Personal Data

FSL collects a client's personal data when a client:

- Requests information from FSL about products and services provided;
- Expresses interest to or enters into a contractual relations with FSL for the provision of products and services;
- Signs up to attend a presentation, webinar or other event hosted by FSL.

FSL processes that Personal Data to:

- Communicate with clients about FSL's products and services prior to becoming a client for information only;
- Manage business operations relating to the provision of products and services to clients;
- Perform contractual obligations;
- Comply with legal obligations or regulatory requirements, including those laid down in tax and company law (including compliance with the Foreign Account Tax Compliance Act and the OECD Common Reporting Standard for Automatic Exchange of Financial Account Information);
- Undertake and comply with anti-money laundering (AML), know your client (KYC), counter-terrorist financing (CTF) laws and regulations and screening against sanctions lists.

The Client Personal Data that FSL Collects

FSL may collect the following types of personal data from clients, including personal data relating to a client's Directors, Officers, employees, beneficial owners and any person or organisation appointed to act on the client's behalf, as applicable. The types of personal data below, comprise, but may not be limited to a data subject's:

Identity and Contact Data

Name, address, telephone number(s), email address(es), date of birth, passport details, nationality or citizenship, employment history and status, education and / or professional background, tax information, employee number, job title and function, knowledge and experience about trading, risk profile and risk tolerance and other personal data concerning preferences relevant to the products and services that FSL provides.

Financial and Payment Data

Bank account and bank details, e-wallet (if applicable), and other data necessary for processing payments and fraud prevention, including credit /debit card numbers, other related billing information.

Business Information

Information provided in the course of the contractual or client relationship between a client or prospective client and / or the client's organisation and FSL, or otherwise voluntarily provided by the client or prospective client or their organisation. This also includes Information about



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income and wealth including details about assets and liabilities, account balances, trading statements, tax and financial statements, and any information relating to complaints, investigations or proceedings.

Information relevant to FSL's products and services

Personal data relevant to any transaction or actions performed by FSL to fulfil a client's instructions or provide products and services or details of products and services or other information requested by a client.

Profile and Usage Data

User identities and passwords for access to Systems owned, operated or otherwise provided by FSL, date and time of access, preferences for receiving FSL or authorised third party, marketing information, communication or terms entered into searches, page response times, download errors, length of visits, page interaction information (such as scrolling, clicks, and mouse-overs), referring pages from another web site or web sites visited on leaving FSL's web site(s), any related audit data and any information derived from relevant monitoring systems.

Technical Data and Cookie Data

Information collected during visits to FSL's web site(s), the Internet Protocol (IP) address, login data, browser type and version, device type, time zone setting, browser plug-in types and versions, operating system and platform. Profile, usage and technical data as collected by cookies in use or selected by the user of the web site(s) as set out by our Website Terms and Conditions

Special categories of personal data

Criminal record data (actual or suspected) for screening purposes.

Health data for visitors, (e.g., disability status for health and safety reasons), dietary information.

Recordings

Recording of phone calls and(or) communications through electronic media for regulatory purposes;

Recording of some meetings to ensure accuracy of minutes and records from presentations.

Recruitment Data

Personal information required to identify the prospective recruit, their right to work in the UK, their academic qualifications, references, special categories of personal data necessary for ensuring legislative compliance during employment and interview notes.

It is important that client personal data that FSL holds is complete, accurate and current. It is a client's responsibility to advise FSL of any changes in personal data during the working relationship with FSL.

In addition to the personal data above, FSL will retain records of a client's trading records, including:

- Products traded;
- Historical information relating to trading undertaken; and



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- Communications with FSL in relation to products and services provided

If a client visits a FSL office, visit records will be collected. This may include CCTV images of the visit, disability or dietary needs to ensure that health and safety requirements are met – this requires explicit consent as it is a special category of personal data.

If a client attends a webinar, video-conference call or leaves messages on voicemail, audio and (or) video) recordings of client interactions will be recorded.

Where AML or KYC checks are carried out, FSL may require additional documented information to support claims made.

FSL may occasionally ask for personal data on a voluntary basis (e.g., market research, satisfaction surveys or special offers).

The personal data above will be provided to FSL (including Affiliates) or the screening providers who assist with legal obligations applicable to FSL.

FSL may also collect, share and use 'Aggregated Data' (e.g., statistical or demographic data) for any purpose. Aggregated data may be derived from a data subject's personal data, but this data is no longer defined as 'personal data' as it will not identify, directly or indirectly, a data subject.

How Client Personal Data is Collected

FSL may collect personal data about clients from the following sources:

- Automatically collected or generated (e.g., web site visit information, device information or trading details);
- CCTV images from premises landlords or taken using FSL's own CCTV systems (if applicable);
- Directly from the client (including when the client is represented by authorized person), typically phone, email, post, filled in paper or electronic forms or other electronic means;
- From third parties including others who are entitled to share this information (e.g., credit agencies, search information providers, business partners, banking and related service providers, analytics providers, public sources or any other service providers), but in each case, as permitted by Data Protection Laws; or
- From any of our Affiliates when consented or requested by the client, including when clients of any our Affiliates requested services partially or fully provided by FSL.

Personal Data Collected About Data Subjects from Third Parties

In some cases, a third party (e.g. a client, supplier, etc) may provide personal data to FSL about other people (such as customers, directors, officers, shareholders or beneficial owners). FSL must be assured by the third party that they have given those data subjects an appropriate notice that they are providing their personal data to FSL and have obtained their consent to that disclosure.

Consequences of Failing to Provide Some Types of Personal Data

If a client fails to provide certain personal data or other information when requested, FSL may not be able to perform the contract proposed, or entered into, or be prevented from complying with legal obligations and regulatory requirements.

Lawful Basis for Processing a Client's Personal Data

FSL will only process a client's personal data when and where there is a lawful basis for processing that personal data, this includes the following circumstances:

1. Where FSL needs to perform the contract with the client;
2. Where FSL needs to comply with a legal obligation to which FSL is subject.
3. Where it is needed in the public interest or for official purposes.
4. Where it is necessary for FSL's legitimate interests (our Affiliates' or those of a third party) and these interests are not overridden by the client's interests, rights and freedoms.
5. Where processing is necessary to protect the vital interests of the data subject or other interested parties.
6. Where the client has given consent for their personal data being processed for one of more specified purposes;

Notes: 1. Generally, FSL does not rely on consent as a lawful basis for processing personal data, except specific cases and purposes when the client's consent is expressly requested.

Note 2: FSL may process personal data for more than one lawful reason, depending on the specific purpose for which that personal data was collected by FSL.

Legitimate Interests

FSL has legitimate business interests in:

- providing broking and other services;
- managing business and relationships with clients, prospective clients, employees and suppliers;
- understanding and responding to inquiries and client feedback;
- understanding how clients use FSL's products, services and web sites;
- identifying what clients want and developing our relationship with the client;
- improving FSL's products, services and offerings;
- enforcing terms of business and web site and other terms and conditions;
- ensuring FSL's systems and premises are secure;
- managing the supply chain;
- developing and managing relationships with business partners;
- managing FSL's IT infrastructure and (or) Systems, including creating back-up copies of data;
- operating consent management, including withdrawal of consent from direct marketing, if applicable; and
- sharing data in connection with providing services, acquisitions and transfers of by FSL.



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How FSL Uses a Client's Personal Data

FSL will only use a client's personal data in accordance with the Data Protection Laws and this Privacy Notice. This includes to:

- Advertise, provide, and assess the effectiveness of FSL's events, promotional campaigns, and publications;
- Business relationship management with clients, prospective clients, event attendees and marketing;
- Client due diligence;
- Client surveys and feedback;
- Communicate by post, e-mail, telephone or any other electronic means about the products and services that FSL provides that may be of interest to clients (this may include sending client details to our Affiliates or third parties who may provide some products or services on FSL's behalf);
- Comply with any legal obligation or regulatory requirement;
- Detect, prevent and investigate illegal or prohibited criminal activities and in the protection of FSL's legal rights (including liaison with Regulators and Law Enforcement agencies);
- Expand and maintain the FSL contact list;
- Event management;
- Furthering FSL's business purposes, including internal administration and billing;
- Manage a client's account(s) for Systems, Electronic Broking Services or other services and provide (or deliver) technical notices, updates, security alerts, and other administrative messages;
- Managing suppliers;
- Notify clients about changes to products and services that FSL provides;
- Operate, troubleshoot, and improve the products and services that FSL provides, including online or electronic services;
- Perform the services under the contract FSL has entered into with a client;
- Process an application for the requested products or services;
- Respond to enquiries or communications relating to FSL's (including our Affiliates) products and services;
- Service provision of FSL's (including our Affiliates) products and services;
- Understand how clients use FSL's products and services including generating and analysing statistics of usage; and
- Website monitoring and management.

FSL will only use a client's personal data for the purposes for which it was collected unless FSL reasonably considers that it should be used for another reason that is compatible with the original purpose.

FSL may use anonymous, pseudonymised or aggregated information that does not identify a client for any purpose, as permitted by Data Protection Laws.

FSL may process a client's personal data without their knowledge or consent where this is required or permitted by Data Protection or other applicable Law.

Summary of How FSL Uses Personal Data

Set out in a tabular format is a description of how FSL uses personal data, either supplied by the data subject or from other sources. Where personal data is used for more than one legal purpose, this is clearly identified. Should a data subject require further information on the specific legal ground that is relied on for processing personal data, please contact the DPO as below.

Purpose of Processing	Categories of Personal Data	Lawful Basis
To manage a client's dealings with FSL	Identity and Contact Data	Performance of a contract with the client Compliance with a legal obligation Necessary for FSL's legitimate interests
To facilitate financial dealings with and for a client	Financial and Payment Data	Performance of a contract with the client Compliance with a legal obligation Necessary for FSL's legitimate interests
To optimally manage the client's relationship with FSL.	Business Information	Performance of a contract with the client Compliance with a legal obligation Necessary for FSL's legitimate interests
To perform transactions on a client's behalf or to provide information relating to FSL's products and services requested by a client. For marketing purposes.	Information relevant to FSL's products and services	Performance of a contract with the client Necessary for FSL's legitimate interests Consent for marketing
To fulfill FSL's legal and regulatory obligations, including AML and KYC requirements, trade reporting etc.	Business Information Information relevant to FSL's products and services Client's trading data and records	Compliance with a legal obligation Necessary for FSL's legitimate interests

To manage a client's access to Systems provided and to optimise their use for clients.	Profile and usage data	Necessary for FSL's legitimate interests
To optimise web site usage and continuous improvement of web site functionality	Technical data & Cookie Data	Consent for optional cookies Necessary for FSL's legitimate interests
To manage the health and safety of clients and visitors when onsite. To undertake due diligence	Special Categories of Personal Data	To protect the vital interests of the client in case of need Compliance with a legal obligation
To record transactions undertaken on behalf of the client.	Recordings	Performance of a contract
To provide an accurate record of interactions between the client and FSL		with the client Necessary for FSL's legitimate interests Consent for recordings of meetings and presentations.
To ensure that prospective employees are suitable for employment by FSL.	Recruitment data	Compliance with a legal obligation Necessary for FSL's legitimate interests

Disclosure of a Client's Personal Data

Once a client has entered into a contract with FSL and / or completed a client application form for the provision of goods and / or services (including marketing material), FSL may share client personal data with:

- Agents appointed by a client (e.g., Investment Managers, Lawyers, those with a Power of Attorney) for whom prior consent (or instructions) has been given to FSL for sharing the client's personal data;
- Appropriate parties in the event of an emergency, including but not limited to emergency services, in case of BCP invocation or ambulance to protect the health and safety of employees and clients on site;
- Financial service providers and agents (including their sub-contractors) or third parties (e.g., FSL's clearing agents, custodians, counterparties, other brokers, trading venues and securities depositories) who process client information on FSL's behalf solely to provide their services to clients, each complying with their own legal obligations or pursuing their legitimate interests as described in this Privacy Notice;
- Other service providers and specialist advisers who have been contracted to provide FSL with services such as IT, trading platforms, apps providers (where applicable),



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- analytics and online marketing optimization, financial, audit, regulatory, compliance, insurance, AML, KYC checks, sanctions checking, research, event hosting services;
- Payment service providers processing a client's transactions, including but not limited to IT support services and screening services;
 - Third parties in order to meet FSL's legal and regulatory obligations, including statutory or regulatory bodies, law enforcement agencies, other competent bodies in accordance with legal or regulatory requirements, credit reference agencies and company auditors as permitted by Data Protection Laws or other law(s) in the jurisdiction of FSL's operations. In these circumstances, FSL will make reasonable efforts to notify the data subject before disclosure of this information, unless prior notice is prohibited by applicable law or it is not possible or reasonable in the circumstances;
 - Our Affiliated companies provide with the services as requested by the client, if such services are rendered partially or in full by our Affiliate(s) or by our sole discretion we believe that it is necessary to perform our contractual obligations in the most efficient way;
 - Third parties who may manage FSL's business or who wish to purchase FSL's business or information assets, including personal data. If such a change should occur, then the new owners or managers, acting as controllers, shall process personal data in the manner set out in this Privacy Notice; and
 - Third parties outside the UK and EEA will need a transfer out of the UK and EEA. If this is the case, then FSL shall ensure that a similar level of protection shall be applied to personal data processing by appropriate means, including, but not limited to, Standard Contractual Clauses, Data Processing Agreements, International Data Transfer Agreements or other legal instruments. Where appropriate, Transfer Impact assessments shall be undertaken.

Note: There are multiple possible recipients of a client's personal data for business purposes, as above, and it is not practical to list them. There are also possible changes, based on transactions, where a different recipient is used. Therefore, categories of recipients have been used above.

Where disclosure of a client's personal data is required to a third party, FSL will only disclose the minimum amount of personal data required to meet contractual or legal requirements.

Third parties are only permitted to use this personal data to provide defined and documented services to FSL and are not permitted to use this personal data for any other purpose.

FSL web site(s) and other Systems may have links to the third party or their web site(s). This Privacy Notice does not cover these third party's use of client personal data and clients should check with each linked web site to determine their privacy practices and procedures relating to the processing of the client's personal data.

FSL may share anonymous, pseudonymised or aggregated information that does not identify a client for any purpose, as permitted by Data Protection Laws.

Note: FSL does not sell any data subject's personal data.



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Use of Automated Decision Taking

FSL may use a client's personal data to undertake automated online identity and background checks for KYC or other purposes and for the purposes of relevant checks in the detection, prevention and investigation of illegal or prohibited criminal activities (e.g., AML and CTF).

Data Retention

FSL will only retain a client's personal data for as long as necessary to fulfil the purposes for which it was collected, including for the purposes of satisfying any legal, accounting, or reporting requirements.

FSL regularly reviews client records to ensure that client personal data is only retained in accordance with these purposes, legislative or regulatory requirements or where it is necessary to retain it for establishment, exercise or defence of actual or potential legal claims.

Where retention periods indicate disposal of client's personal data, FSL will securely destroy all client personal data in accordance with the FSL Record Keeping Policy that meets applicable laws and regulations.

In some circumstances, FSL may anonymise a data subject's personal data (so that it cannot be associated with a data subject) for research or statistical purposes. In the case the data is no longer defined as personal data, and FSL may use this personal data indefinitely without further notice to the data subject.

In general terms, as outlined in the FSL Record Keeping Policy, personal data should be held no more than 5 years after it's trigger point or 6 years for financial records. Trigger points vary according to legislative and regulatory requirements and business need.

Client Rights in Relation to Processing Personal Data in FSL

Clients have a number of rights, under certain circumstances, in relation to the processing of their personal data, these are the right to

- be informed about the collection and the use of their personal data;
- access personal data and supplementary information;
- have inaccurate personal data rectified, or completed if it is incomplete;
- erasure (to be forgotten) in certain circumstances;
- restrict processing in certain circumstances;
- data portability, which allows the client to obtain and reuse their personal data for their own purposes across different services;
- object to processing in certain circumstances;
- rights in relation to automated decision making and profiling where this is conducted without human intervention and where the client believes it is to their legal detriment; and
- the right to withdraw consent at any time (where relevant).

To exercise any of these rights, contact the DPO, who oversees compliance with this Privacy Notice as below:

compliance@fortsecurities.com

It is important that the personal data that FSL holds about clients is accurate and current.



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Note: It is the client's responsibility to advise FSL of any changes in their personal data.

To exercise these rights, a requestor shall be required to prove their identity, confirm the right to exercise a right and specific details of the personal data in the right to be exercised. This is a security control to ensure that personal data is not disclosed to, modified or deleted by an unauthorised party.

FSL will respond to any valid exercise of a data subject's rights within a month. However, for a complex request this may take longer than a month, in which case FSL shall advise the requestor of this delay.

The Right to Complain To FSL

Whilst FSL works to the highest standards when processing client personal data. If any client has any queries or concerns relating to how FSL processes their personal data, they should contact the DPO:

compliance@fortsecurities.com

UK Information Commissioner's Office (ICO)

If still dissatisfied by the DPO's answer, a complaint can be made to the Information Commissioner's Office (ICO) who is the UK Supervisory Authority.

The Information Commissioner
Wycliffe House
Water Lane
Wilmslow
Cheshire, SK9 5AF

Email: casework@ico.org.uk
Telephone: 0303 123 1113
Textphone: 01625 545860
Monday to Friday, 09:00 to 16:30

Alternatively, it is possible to have a 'Live Chat' via the ICO's web site, <https://ico.org.uk/make-a-complaint/>

Transfers of Client Personal Data

The UK has been defined as 'Adequate' by the EC for transfers of personal data (June 2021).

Where transfers outside the UK and EU are undertaken, then they are subject to appropriate safeguards, including:

- Standard Contractual clauses (SCCs);
- Data Processing Agreements (DPAs);
- International Data Transfer Agreements (IDTAs); and
- Transfer Impact assessments (TIAs) shall be undertaken, where appropriate.

Electronic Communications Containing Client Personal Data

Clients (or their agents) may send personal data to FSL electronically.



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FSL is not responsible for the security of these communications and recommends that clients use secure means for them.

Cookies

Cookies are small text files, processed and stored by web browsers, that web sites place on the user's device that they are using to browse the web site. Cookies allow web sites to recognise the user's device and preferences and provide information to the owners of sites which can be used to improve the online experience. Please refer to FSL's Website Terms and Conditions for further details.

Personal Data Security

FSL has put in place information / cyber security measures to protect client personal data against loss, unauthorised access, modification or disclosure whilst at rest, use or in transmission.

Technology controls include:

- Firewalls & Intrusion Detection / Prevention;
- Endpoint Detection and Response;
- DDoS Protection;
- Malware protection;
- Security Awareness Training;
- Patch and Configuration Management Systems;
- Secure Disposal Tools;
- Mobile Device Management;
- Remote Device Encryption;
- Physical & Logical Access Controls subject to regular review for continued business need;
- Vulnerability Scanning; and
- Passphrase Management and Multifactor Authentication Tools.

Procedural controls include:

- Comprehensive Policy Management Program;
- Cyber Risk Assessments;
- Vulnerability Management and Penetration Testing Program;
- Global Internet Facing IP scans;
- Business Continuity and Disaster Recovery Management;
- Security Device and Application Audit Log Reviews; and
- Ensuring that Processors have security controls in place at least equivalent to those in FSL.

People controls include:

- Industry certified and recognized information / cyber security staff;
- Robust information / cyber security awareness training;
- Online compliance and data protection / privacy courses; • Pre-employment background screening; and



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- Employee confidentiality agreements.

FSL has implemented incident response procedures to deal with any adverse events that may affect client or FSL information. These are subject to regular exercising with a range of scenarios, where this affects personal data, either actual or suspected, data subjects and relevant authorities, including relevant regulators, shall be notified where this is a legal or regulatory requirement.

Changes to this Privacy Notice

FSL may change, modify or adjust this Privacy Notice from time to time, however, this will not reduce any rights defined in this Privacy Notice.

Any changes made to this Privacy Notice in the future will be found on the FSL web site.

Contacting FSL's DPO

To contact FSL's DPO by post:

Data Protection Officer
Forte Securities Ltd
4th Floor,
36 Golden Square,
London W1F 9EE
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compliance@fortsecurities.com

Dated March, 2025