Privacy

Your privacy is very important to us.

We take great care in protecting your privacy and the information you provide whilst working with us.

The purpose of this policy is to give you a clear explanation about how BRUTON Trading LLC collects and uses the personal data you provide to us and that we collect. We ensure that we use your information in accordance with all applicable laws concerning the protection of your personal data.

Our data protection officer

If you have any queries concerning this policy, or would like to make a subject access request, please contact our Data Protection Officer:

Email: info@brutontrading.com

Personal data we collect

We will collect your contact information such as full name, company name, email address, postal address and telephone number when you email or call us with an enquiry.

In addition to the above, we collect information automatically about your visit to our website. Please see our Cookies policy for more details.

How we use your personal data

The personal information we collect will be used for the following purpose;

- Dealing with enquiries and requests about our services submitted to us via email or call
- Sending you information about our company that is applicable to you and your request

Our legal basis for processing of your personal information is;

- Where you have given consent for the processing of data for a specific purpose
- Processing is necessary to meet contractual obligations entered into with you
- Processing is necessary for purposes of legitimate interest pursued by our company in relation to goods and services that you use in your role

The legitimate interest pursued by us are as follows;

- In response to an enquiry from you about our goods and services
- Enquiring about your goods and services that are applicable to our company. We will always confirm how your personal information was obtained and always offer an opt-out of marketing communications

Who we share your personal data with

We will never pass your personal data on to other organisations for them to use for their own marketing purposes.

However, we may disclose your personal information in the following circumstances:

- To third parties to perform functions on our behalf. We require these third parties to comply
 strictly with our instructions and data protection laws and we make sure that appropriate
 controls are in place. We enter into contracts with all our third parties and regularly monitor
 their activities to ensure they are complying with our policies and procedures. They will only
 have access to the personal data needed to perform their functions, and will not use it for
 other purposes.
- Where we are under duty to disclose your personal information in order to comply with law or the disclosure is 'necessary' for purposes of national security, taxation and criminal investigation or we have your written consent.

From time to time the personal data we collect from you may be transferred to and stored in countries outside of the European Economic Area ("EEA"). Your personal data may also be processed by a service provider which operates outside of the EEA. Different countries have different data protection and security laws and some of these do not offer the same level of protection as you enjoy under UK data protection legislation. However, when we appoint our service providers, we take care to ensure that they have appropriate security measures in place. We shall endeavour to ensure that your personal data is kept confidential and secure.

How we protect your personal data

BRUTON Trading LLC maintains appropriate technical, administrative and physical safeguards to protect information, including, without limitation, personal data, received or collected by us. We review, monitor and evaluate our privacy practices and protection systems on a regular basis. Only certain employees have access to the personal data you provide us and are only granted access for data analysis and quality control purposes.

How long we will keep your personal data

Unless a longer retention period is required or permitted by law, we will only hold your personal information on our systems for the period necessary to fulfil the purposes outlined in this Privacy Policy or until you request it is deleted.

Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access you have the right to request a copy of the information that we hold about you.
- Right of rectification you have a right to correct data that we hold about you that is
 inaccurate or incomplete.
- Right to be forgotten in certain circumstances you can ask for the data we hold about you
 to be erased from our records.
- **Right to restriction of processing** where certain conditions apply to have a right to restrict the processing.
- **Right of portability** you have the right to have the data we hold about you transferred to another organisation.
- Right to object you have the right to object to certain types of processing such as direct marketing.
- Right to judicial review in the event that BRUTON Trading LLC refuses your request
 under rights of access, we will provide you with a reason as to why. You have the right to
 complain as outlined below.

Queries

If you have any queries concerning this policy, or would like to make a subject access request, please contact our Data Protection Officer:

Email: info@brutontrading.com

In the event that you wish to make a complaint about how your personal data is being processed by NAME OF FIRM or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and NAME OF FIRM's Data Protection Officer.

Website: https://ico.org.uk/concerns

Telephone helpline: 0303 123 1113

We may change this Privacy Policy from time to time. If we change the Policy, we will post the revised version here and change the "Effective Date" listed at the top of this Policy. We encourage you to check here periodically for the most up-to-date version of our Policy.

Cookie Policy

We use cookies and/or similar technologies to analyse customer behaviour, administer the website, track users' movements, and to collect information about users. This is done in order to personalise and enhance your experience with us.

A cookie is a tiny text file stored on your computer. Cookies store information that is used to help make sites work. Only we can access the cookies created by our website. You can control your cookies at the browser level. Choosing to disable cookies may hinder your use of certain functions.

We use cookies for the following purposes:

- Necessary cookies these cookies are required for you to be able to use some important features on our website, such as logging in. These cookies don't collect any personal information.
- Functionality cookies these cookies provide functionality that makes using our service more
 convenient and makes providing more personalised features possible. For example, they
 might remember your name and e-mail in comment forms so you don't have to re-enter this
 information next time when commenting.
- Analytics cookies these cookies are used to track the use and performance of our website and services

You can remove cookies stored in your computer via your browser settings. Alternatively, you can control some 3rd party cookies by using a privacy enhancement platform such as optout.aboutads.info or youronlinechoices.com. For more information about cookies, visit allaboutcookies.org.

We use Google Analytics to measure traffic on our website. Google has their own Privacy Policy which you can review <u>here</u>. If you'd like to opt out of tracking by Google Analytics, visit the <u>Google Analytics</u> opt-out page.