

# Privacy Policy

*Effective as of March, 2023*

## 1. Introduction

Balanz Capital UK LLP (“Balanz”, “we” or “us”) recognizes and values the trust that you place in us when interacting with us. Balanz is dedicated to protecting the confidentiality and privacy of your personal information.

This Privacy Policy sets out how we collect, use, and protect the personal information we may collect from you as part of your interaction with our website, as well as your rights under data protection legislation.

We publish the current version of this Privacy Policy on our website, and we will update this from time to time.

## 2. Contact Us

If you have any questions about this Privacy Policy or would like to make a complaint about how we use your personal information, please contact us:

By email: [jrivadeneira@balanz.com](mailto:jrivadeneira@balanz.com)

By phone: +44 20 3609 8641

If you are not satisfied with the response we provide, you have the right to lodge a complaint with the Information Commissioner's Office. Find out on their website how to report a concern at [ico.org.uk/concerns/](https://ico.org.uk/concerns/).

## 3. Who we are

Balanz Capital UK LLP is a limited liability partnership incorporated in England and Wales under the Limited Liability Partnerships Act 2000, with registered number OC420535, and is registered as a controller with the Information Commissioner's Office (ICO registration number: ZB487919). Balanz is authorized and regulated by the Financial Conduct Authority (“FCA”) in the United Kingdom under Reference Number 816802 as of November 20, 2018. Under the terms of its FCA registration, Balanz may act only as a Matched Principal Broker, which means the firm may control but not hold client money and is unable to: (i) hold financial instruments for its own account unless it meets the 'matched principal exemption conditions' as defined in the FCA's Glossary of defined expressions used in the FCA's Handbook, and (ii) underwrite MiFID financial instruments and/or place MiFID financial instruments on a firm commitment basis. Balanz is limited to dealing with institutional qualified professional counterparties only and not able to deal with Retail Investors (as per MiFID's classification).

## 4. The Data We Collect About You

Personal Information means any information relating to an identified or identifiable natural person. We may collect, use, store and transfer (together “process”) different kinds of personal information about you as follows:

- **Identity Data** includes: first and last name.
- **Contact Data** includes: email address and telephone number.
- **Technical Data** includes: internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

- **Usage Data** includes: information about how you use our website.

## **5. How We Collect Your Personal Information**

Balanz may collect your personal information from the following sources:

- direct interactions with you via our website; and
- automated technologies or interactions. We may collect this personal information by using cookies, server logs and other similar tracking technologies. Please see the "Cookies" section below for further details.

## **6. How We Process and Use Your Personal Information**

Your personal information is protected by data protection legislation. We are only permitted to process your personal information where we have a "lawful basis" on which to do so. There are two lawful bases which we may rely on in order to process your personal information: (i) to meet any of our legal obligations; and (ii) when it is in our legitimate interests. Most commonly, we will process your personal information in the following circumstances:

- To provide you with information about our services;
- To discharge our legal and regulatory obligations; for example, to prevent and respond to actual or potential fraud or illegal activities according to KYC and anti-money laundering regulations;
- To establish, exercise or defend our legal rights or for the purpose of legal proceedings;
- To record and monitor your use of our website, or our other online services for our business purposes which may include analysis of usage, measurement of site performance and generation of marketing reports;
- In the event that we buy or sell any business or assets, or substantially all of our assets are acquired by a third party, we may share your personal information to the prospective buyer, and in the event of an acquisition, personal information held by us about our clients will be one of the transferred assets;
- For managing the operation of our website, our site and our business; and
- To address any complaints or queries you may have.

We have determined that we may rely on legitimate interests as the lawful basis on which to process your personal information in limited circumstances. In order to reach this decision, we have carried out a balancing exercise to ensure that our legitimate interest does not override your privacy rights under data protection legislation.

We consider that it is reasonable for us to process your personal information for the purposes of our legitimate interests outlined above as: (a) we process your personal information only so far as is necessary for such purpose; and (b) you reasonably expect for us to process your personal information in this way (based on the information that we have provided in this Privacy Policy and in other interactions).

## **7. Cookies**

Cookies are small data files stored on your hard drive or in device memory that help us to improve our services and your experience. Balanz uses various technologies to collect information on our services and these may include sending cookies to your computer or mobile device. You can set your browser settings to refuse all cookies. However, if you do not accept cookies, you may not be able to use some features of our website.

## **8. Disclosures Of your Personal Information**

In providing our services, we may share your personal information, to the extent we are permitted to do so under data protection legislation, as follows:

- Disclosures to third party agents/suppliers or contractors. This may include, but is not limited to, IT service providers such as cloud providers of software as a service, data room providers and providers of our IT servers and communications service providers; and our professional advisors (legal, auditing or other special services provided by lawyers, notaries, trustees, company auditors or other professional advisors). In the event of such disclosure, the party receiving your personal information will only process this in accordance with our instructions and will be subject to a duty of confidentiality; and
- In order to comply with any law, regulation or court order.

## **9. International Transfers**

Balanz shares your personal information with other members of its group which are based in Argentina. The UK Secretary of State has deemed that Argentina provides an adequate level of protection for your personal information. We also share your personal information with other affiliates of Balanz and with international service providers. This will involve transferring your personal information outside the UK.

Whenever we transfer your personal information to a party located out of the UK, we ensure a similar degree of protection is afforded to your personal information as in the UK by ensuring that appropriate safeguards are implemented. These safeguards may include:

- Determining whether the country in question has been deemed to provide an adequate level of protection for personal information by the UK Secretary of State; and
- Putting in place contractual terms with the party receiving your personal information which have been issued by the Information Commissioner's Office and which give personal information the same protection it has in the UK (so called Standard Contractual Clauses).

Prior to transferring your personal information outside of the UK, we will carry out an appropriate risk assessment of the laws and practices of the destination country. This will allow us to identify any technical and organizational measures which are required to ensure an appropriate level of protection for your personal information.

## **10. Data Security**

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way. 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. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

## 11. Retention of Your Personal Information

We will only retain your personal information for as long as necessary to fulfil the purposes for which we collected it. This includes for the purposes of satisfying any legal obligation. You can ask us to delete your personal information at any time. To determine the appropriate retention period for personal information, we consider the nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information, whether we can achieve those purposes through other means, and any applicable legal requirements.

## 12. Your Legal Rights

You have various rights under data protection legislation. These are as follows:

- **Right of access:** you can ask us to provide you with a copy of the personal information that we hold about you.
- **Right to rectification:** if you believe any of your personal information is incorrect or incomplete, we will, upon your request, take steps to check it and correct any factual inaccuracies.
- **Right to erasure:** you can ask us to delete, remove, or stop using your personal information if there is no good reason for us to continue processing it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing it.
- **Right to restriction of processing:** under certain circumstances, you may ask us to restrict the processing of your personal information.
- **Right to object to processing:** under certain circumstances, you can object to us processing your personal information.
- **Right to data portability:** if we hold your personal information electronically, you can ask us to transfer the data to another organization in a safe and secure way and in a machine-readable format.

If you wish to exercise any of the rights set out above, please contact us by emailing [jrivadeneira@balanz.com](mailto:jrivadeneira@balanz.com).