



# Privacy Policy

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## 1. Introduction

MEXEM FINANCIAL SERVICES UK LIMITED ("the Company", "Mexem", "we", "us") is an investment firm incorporated and registered in the United Kingdom with company registration number 15248800 and is authorised and regulated by the Financial Conduct Authority (FCA) under reference number 1009371. This Privacy Policy outlines how we collect, use, disclose, and protect your personal information, in compliance with the UK General Data Protection Regulation ("UK GDPR") and other applicable data protection laws.

This policy applies to current, prospective, and former clients who interact with Mexem, including users of our services for tax-advantaged investment products such as Individual Savings Accounts (ISAs). It also extends to our website ([www.uk.mexem.com](http://www.uk.mexem.com)) and affiliated services.

## 2. Collection of Personal Information

When you register with Mexem Financial Services UK Limited ("The Company"), you acknowledge that you are providing personal information that we will use to establish your identity, comply with legal obligations, and facilitate the opening of a trading account with Interactive Brokers (U.K.) Limited ("IBUK"), as part of our role as an introducing broker.

The company is a company incorporated under the laws of England and Wales and is authorised and regulated by the Financial Conduct Authority (FCA). As part of our obligations under UK anti-money laundering (AML) and Know Your Customer (KYC) regulations, we collect personal information in accordance with strict verification procedures. This helps prevent fraud, detect financial crime, and ensure the integrity of your account.

The personal information we collect may include:

- Identity and contact details (e.g. name, date of birth, address, email)
- Government-issued identification documents (e.g. passport, driving licence)
- Financial details and tax identification numbers
- Employment status and investment objectives
- Other documentation required by regulatory authorities

Our lawful basis for processing this data includes the performance of a contract (e.g., opening and maintaining your account), compliance with our legal obligations, and our legitimate interest



in preventing fraud and managing risk. In some cases, we may also rely on your consent, where applicable.

We expect our clients to provide accurate, complete, and up-to-date information. You confirm that you are acting on your own behalf and not impersonating another individual or engaging in any fraudulent activity.

In addition to the information you provide, we may collect data through the use of cookies and other tracking technologies when you visit our website. These tools help us understand how clients interact with our website and allow us to improve our services. Some cookies are essential for site functionality, while others (e.g., performance or marketing cookies) are used only with your consent.

You can manage your cookie preferences through your browser settings or our cookie management tool. Please note that disabling certain types of cookies may affect the performance of the website.

Access to your personal information is strictly limited to authorised personnel within Mexem who require it to fulfil their duties. We maintain appropriate technical and organisational measures to protect your data.

### **3. Sharing Your Personal Information with Third Parties**

We only share your personal information with third parties where it is lawful, necessary, and proportionate to do so. This includes disclosures:

- To comply with legal and regulatory obligations
- To fulfil our contractual obligations to you
- To protect your account and ensure the security of our systems
- With your explicit consent (where required)

Your personal data may be shared with the following categories of third parties:

- Interactive Brokers (U.K.) Limited (IBUK), for the purpose of onboarding and servicing your trading account under our introducing broker arrangement
- Regulatory or government authorities, such as the Financial Conduct Authority (FCA), HM Revenue & Customs (HMRC), or law enforcement agencies
- Professional service providers, such as compliance consultants, auditors, legal advisors, or IT infrastructure providers
- Identity verification and anti-money laundering (AML) service providers, where required to verify your identity and comply with applicable laws



- Other third parties you instruct us to engage or give us consent to share your data with

We ensure that any third party we engage to process your personal information does so in accordance with applicable data protection laws, and under a written agreement that includes appropriate confidentiality and security obligations.

Where personal information is transferred outside the UK or EEA, we ensure suitable safeguards are in place in accordance with Section 6 of this Privacy Policy.

We do not sell your personal data to third parties. Your data is never shared for advertising or marketing purposes without your consent.

If you have any questions about how or with whom your personal data is shared, please contact us at [dpo.uk@mexem.com](mailto:dpo.uk@mexem.com).

#### 4. Use of Personal Information

Mexem uses the personal information you provide in accordance with applicable data protection laws, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Your personal data is used for the following purposes:

- To administer your trading account and facilitate transactions, including through our partner Interactive Brokers (U.K.) Limited ("IBUK"), in accordance with our Terms and Conditions
- To comply with legal and regulatory obligations, such as anti-money laundering and financial reporting
- To maintain records of your interactions with the Company for operational, regulatory, and dispute resolution purposes
- To manage our relationship with you, including responding to inquiries, service updates, and account-related communications

The lawful bases for processing your personal information may include:

- **Performance of a contract:** to provide you with the financial services you have requested
- **Compliance with legal obligations:** to meet requirements under FCA rules and applicable financial laws



- **Legitimate interests:** to maintain service quality, ensure the security of our systems, and improve customer experience

We may also contact you occasionally by phone or email to request feedback, conduct market research, or provide you with information about our services. Where required by law, such marketing communications will only be sent with your prior **opt-in consent**. You may withdraw your consent or opt out of such communications at any time by using the unsubscribe link provided in our emails or by contacting us at [info.uk@mexem.com](mailto:info.uk@mexem.com).

We do not use your personal information for automated decision-making that produces legal effects or significantly affects you, unless required for fraud prevention or where otherwise permitted by law.

All personal information is stored securely and used only for the purposes outlined in this policy. It will not be shared with third parties except as described in our Privacy Policy and in accordance with applicable law.

## **5. Security of Clients' Personal Information**

Mexem is committed to protecting the confidentiality, integrity, and availability of your personal information. In accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and guidance issued by the Information Commissioner's Office (ICO), we implement appropriate technical and organisational measures to safeguard your data.

We also have procedures in place to identify, report, and manage any personal data breaches in accordance with legal and regulatory requirements.

Our information security practices are reviewed regularly to ensure they remain effective in protecting against evolving threats. By applying these controls, we aim to prevent unauthorised access, disclosure, alteration, or loss of your personal information.

If you have any questions about how we protect your personal data, you may contact our Data Protection Officer at [dpo.uk@mexem.com](mailto:dpo.uk@mexem.com).

## **6. International Transfers of Your Personal Information**

As part of our services, we may transfer your personal information to countries or territories outside of the United Kingdom and/or the European Economic Area (EEA). This may include jurisdictions that do not benefit from an adequacy decision under UK or EU data protection law, such as the United States.



When such transfers occur, we ensure that appropriate safeguards are in place in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and, where applicable, the EU GDPR.

These safeguards may include:

- **UK-approved International Data Transfer Agreements (IDTAs)**
- **Standard Contractual Clauses (SCCs)** adopted by the European Commission or UK authorities
- **Binding Corporate Rules** (where applicable)
- Transfers to countries formally recognised as providing adequate protection

We will take all reasonable steps to ensure that your data is treated securely and in accordance with applicable laws, including requiring that the recipient of the data maintains appropriate technical and organisational measures.

You have the right to request further information about the safeguards we implement when transferring your personal data internationally. Please contact us at **dpo@mexem.com** if you wish to receive a copy of the applicable transfer mechanisms or have any questions.

## 7. Updating Your Personal Information

It is important that the personal information we hold about you is accurate and current. Please inform us promptly if any of your details change — for example, your name, contact number, address, or email address.

You can request to update or correct your personal information at any time by contacting Mexem UK Customer Service through the contact form at [www.uk.mexem.com](http://www.uk.mexem.com) or by emailing [info.uk@mexem.com](mailto:info.uk@mexem.com).

Under UK data protection law, you also have the right to request the rectification of inaccurate or incomplete personal data we hold about you. We will respond to such requests in accordance with our legal obligations.

While we rely on you to provide accurate and complete information, we also take reasonable steps to ensure that the data we hold is up to date. Please note that failure to keep your information current may affect our ability to provide you with services or comply with regulatory requirements.

If you believe any of the information we hold about you is incorrect, please contact us, and we will take appropriate steps to correct it.



## 8. How Long Do We Retain Your Personal Information?

We retain your personal information only for as long as necessary to fulfil the purposes for which it was collected, including to meet legal, regulatory, accounting, or reporting obligations.

Retention periods are determined in accordance with:

- The nature of the information
- The purpose for processing
- Legal and regulatory requirements (e.g. under FCA rules)
- Internal business needs (e.g. recordkeeping, auditing, dispute resolution)

For example, we may retain client records, including identification and transaction data, for a minimum of **five to seven years** after the end of our business relationship, in line with FCA requirements and anti-money laundering regulations.

Where data is no longer needed for the stated purposes, we will either securely delete it or anonymise it so that it can no longer be associated with you.

In certain cases, we may retain data for longer periods if:

- Required by applicable law
- Necessary in connection with actual or potential legal claims
- Required for regulatory or investigative purposes

You have the right to request the deletion of your personal data under certain circumstances (see Section 9: Your Rights). Please contact us at **dpo.uk@mexem.com** for more information on your rights or our data retention practices.

## 9. Your Rights Under UK and EU Data Protection Law

If you are a resident of the United Kingdom or the European Economic Area (EEA), or your personal information is otherwise processed by a Mexem entity subject to the UK GDPR or EU GDPR, you have the following legal rights in relation to your personal data:

- Right of access: You have the right to request a copy of the personal information we hold about you and information about how it is being processed.
- Right to rectification: You may ask us to correct or update inaccurate or incomplete personal information.
- Right to erasure ("right to be forgotten"): In certain cases, you can request that we delete your personal information. Please note that we may need to retain certain information to comply with legal obligations.



- Right to restrict processing: You can request that we restrict the use of your personal information in specific circumstances.
- Right to object: You have the right to object to processing where we rely on our legitimate interests or where your data is used for direct marketing purposes.
- Right to data portability: You can request that we provide your personal data to you or to a third party in a commonly used, machine-readable format.
- Right to withdraw consent: If we rely on your consent to process your personal information, you can withdraw it at any time. Withdrawing consent will not affect the lawfulness of processing based on consent before its withdrawal.

To exercise any of these rights, please contact our Data Protection Officer at [dpo.uk@mexem.com](mailto:dpo.uk@mexem.com). We may ask you to verify your identity before acting on your request to ensure we are protecting your data.

In most cases, we will respond to your request within one month. We do not charge a fee for handling your request unless it is manifestly unfounded, excessive, or repetitive, in which case we may charge a reasonable administrative fee or decline the request.

If you are not satisfied with our response, you have the right to lodge a complaint with the Information Commissioner's Office (ICO) in the UK or the relevant supervisory authority in your jurisdiction.

ICO Contact Details:

Website: [www.ico.org.uk](http://www.ico.org.uk)

Helpline: 0303 123 1113

## **10. Opting Out of Marketing Communications**

If you no longer wish to receive marketing emails, calls, or other promotional communications from Mexem, you may opt out at any time by:

- Contacting us at [info.uk@mexem.com](mailto:info.uk@mexem.com) with your request

Please note that even after opting out of marketing communications, we may still contact you with essential information about your account or services we provide to you (e.g. legal updates or service notifications).



## **11. MEXEM GROUP Cookie POLICY**

### **11.1 What Are Cookies and Web Beacons?**

Cookies are small text files that are stored on your device (such as your computer or smartphone) when you visit a website. They are widely used to make websites work efficiently, to improve the user experience, and to provide information to the site owners.

Cookies may collect a range of information, including:

- Your Internet Protocol (IP) address
- Browser type and operating system
- The pages you visit and the time spent on them
- Your preferences or settings for using the website

Some cookies are essential for the operation of the website, while others help us understand how you use our services so we can improve them or show you relevant content.

Web beacons (also known as pixel tags or clear GIFs) are small transparent images embedded in web pages or emails. They are used to monitor your interaction with a website or email—such as whether you opened a message or clicked a link—and can work together with cookies to collect usage statistics.

### **11.2 How We Use Cookies and Web Beacons**

Mexem UK collects information through cookies and web beacons to enhance your user experience, analyse site usage, and deliver relevant content. Some of these technologies are essential to the functioning of our website, while others help us improve performance or personalise your experience.

Cookies and related tracking technologies are stored in accordance with our Privacy Policy and used only for the specific purposes described below.





Where required by law, we will obtain your consent before placing non-essential cookies on your device. You may manage your cookie preferences at any time using our cookie consent tool or by adjusting your browser settings.

### 11.3 Strictly Necessary Cookies

These cookies are essential for the proper functioning of our website and cannot be turned off in our systems. They are typically set in response to actions taken by you that amount to a request for services, such as:

- Setting your privacy preferences
- Logging in to your account
- Filling out secure online forms

Because these cookies are necessary for core website functionality, they do not require your consent under applicable data protection laws.

While these cookies do not typically store information that directly identifies you, they may store anonymised or session-based identifiers (such as a session ID) that could be considered personal data under certain circumstances.

You can configure your browser to block or alert you about these cookies; however, doing so may prevent parts of the site from functioning properly.

### 11.4 Performance Cookies and Web Beacons

These cookies and web beacons help us understand how visitors interact with our website by collecting and reporting information anonymously. They allow us to count visits, measure traffic sources, and identify which pages are most or least popular. This information enables us to improve the performance and usability of our site.

We use **Google Analytics**, a web analytics service provided by Google LLC. Google Analytics uses cookies to collect information about your interaction with the site, including your IP address. This data may be transferred to and stored by Google on servers in the United States or other jurisdictions. Google uses this information to evaluate website usage, generate reports, and provide other related services.

Google may also transfer this information to third parties where required to do so by law or where such third parties process the information on Google's behalf. Your IP address will not be associated with other data held by Google.

Where required by law, we seek your consent before placing these cookies. If you do not allow them, we will not include your visit in aggregated site usage statistics.

You can find out more about how Google Analytics processes personal data here: <https://policies.google.com/privacy>



### **11.5 Functional Cookies**

Functional cookies enable the website to provide enhanced features and personalisation, such as remembering your preferences or enabling third-party tools embedded in our site.

These cookies may be set by us or by third-party providers whose services we have integrated. If you do not allow these cookies, some features may not function properly, and your experience may be less personalised.

### **11.6 Targeting Cookies and Web Beacons**

Targeting cookies and web beacons may be set through our website by advertising partners. These technologies may track your browsing habits across different websites and build a profile of your interests to display more relevant advertisements on third-party platforms.

Although these cookies do not directly store personally identifiable information, they work by uniquely identifying your browser and device.

If you choose not to allow these cookies, you may still see ads, but they may be less relevant to your interests. Our website does not respond to "Do Not Track" (DNT) browser signals, and we do not provide cross-site behavioural advertising ourselves.

You can manage your cookie preferences at any time through our cookie consent tool or your browser settings.

## **12. Changes to This Privacy Policy**

We may update this Privacy Policy from time to time to reflect changes in our practices, legal requirements, or customer feedback. Any updates will be published on our website with a revised "Last Updated" date at the top of the policy.

We encourage you to review this Privacy Policy periodically to stay informed about how we protect your personal data.

If the changes are material, we will provide additional notice (e.g. via email or within your client portal) where appropriate.

## **13. Contact Information**



If you have any questions, comments, or concerns about this Privacy Policy or the way your personal information is handled, please contact us:

**Email:** [info.uk@mexem.com](mailto:info.uk@mexem.com)

**Data Protection Officer:** [dpo.uk@mexem.com](mailto:dpo.uk@mexem.com)

**Website:** [www.uk.mexem.com](http://www.uk.mexem.com)

You also have the right to lodge a complaint with the UK Information Commissioner's Office (ICO):

**Website:** [www.ico.org.uk](http://www.ico.org.uk)

**Phone:** 0303 123 1113