



CLIENT PRIVACY NOTICE

WHAT IS THE PURPOSE OF THIS DOCUMENT?

This privacy notice describes how we collect and use personal information about you during and after your relationship with us, in accordance with the General Data Protection Regulation (“GDPR”).

It applies to all clients of Virtu Financial (“**you**”, “**your**”). References to Virtu Financial (“**us**”, “**our**”) are to each of Virtu Europe Trading Limited, Virtu Financial Ireland Limited, Virtu ITG UK Limited, and Virtu ITG Ventures Limited, except where otherwise stated.

WHAT DATA DO WE COLLECT?

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We will collect, store, and use the following categories of personal information about you:

- Personal Contact details, such as name, title, addresses, telephone numbers, and personal email addresses,
- Date of birth (where required)
- Nationality (where required)
- Copies of Proof of ID - passport /driving licence (where required)
- Copies of Proof of Address - Utility bills (where required)
- Details of World Check Searches/Bureau Van Dijk Searches (where required)
- For UBOs and Shareholders - ownership information (where required)

Virtu Financial does not collect sensitive personal data about clients as there is no legal requirement to collect such data. Please do not send any sensitive personal data to us.

HOW DO WE COLLECT YOUR DATA?

Virtu Financial collects personal data about clients specified above through the on-boarding process directly from the client who will provide us details in relation to business contacts at the client, directors, shareholders and ultimate beneficial owners and where required, Virtu Financial will run checks on clients through systems such as World Check or Bureau Van Dijk to determine any regulatory issues, fines or PEP status in line with our policies.



Virtu Financial may sometimes request additional information in relation to clients in order to fulfil our legal requirements regarding Anti-Money Laundering and Counter Terrorist Financing policies.

You should be aware that it is not a condition of your contract with us that you agree to the provision of personal data. However, as part of the on-boarding process where clients cannot provide the personal data when requested, we may not be in a position to offer services to the client due to the fact that we may be prevented from complying with our legal and regulatory obligations.

HOW WILL WE USE YOUR DATA?

Virtu Financial may use client personal data in order to conduct business with our clients or when required by law. Most commonly, Virtu Financial will use client personal data to comply with our obligations under our Anti Money Laundering and Counter Terrorist Financing policies.

Other instances may arise where necessary for Virtu Financial's legitimate interests (or those of a third party), provided that the client's interests and fundamental rights do not override those interests.

Other client personal data may be used in the following situations:

- Where required to protect client interests (or someone else's interests); or
- Where it is needed in the public interest.

Virtu Financial needs all the categories of information detailed under the "What data do we collect" section above primarily to allow Virtu Financial to (a) provide services and conduct business in accordance with our contractual obligations to the client, (b) to enable the Firm to comply with legal obligations and (c) to pursue legitimate interests of the Firm or those of third parties, provided that, in the case of (c), client interests and fundamental rights do not override those interests. The situations in which the Firm will process client personal data are listed below.

- putting in place a terms of business for provision of services to clients: (a), (b) and (c)
- completing onboarding process and complying with MiFID II and Anti Money Laundering obligations: (a) and (b)
- Complying with requests from our regulators, exchanges further to our legal obligations: (b)
- to monitor use of our information and communication systems to ensure compliance with our IT policies: (a), (b) and (c).
- business management and planning, including accounting and auditing: (a), (b) and (c).
- making arrangements for the termination of client relationship: (a), (b) and (c).
- to detect and prevent fraud: (a), (b) and (c).
- to ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution: (a), (b) and (c).



DATA RETENTION

Personal data relating to clients will be held for as long as necessary and in accordance with Virtu Financial's recordkeeping policy to fulfil the purposes it was collected for, including for the purposes of satisfying any legal, accounting or reporting requirements.

To determine the appropriate retention period for personal data, Virtu Financial considers the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of personal client data, the purposes for which personal client data is processed and whether Virtu Financial can achieve those purposes through other means, and the applicable legal requirements.

DATA SHARING

Virtu Financial does not engage any third parties for the purposes of processing client personal data except as noted herein. Third parties such as regulators or affiliate Virtu entities may receive client personal data in accordance with the below.

Under the Customer Agreement, you have authorised Virtu Financial to transfer personal data to third parties to the extent necessary to provide the services or to comply with EU, Member State or National Law to which Virtu Financial is subject.

We may transfer client personal information to our group companies located in the following countries outside the EU in connection with the provision of the services: United Kingdom, United States, Canada, Hong Kong, Australia and Singapore. To-date, the European Commission has not recognised the United States, Hong Kong, Australia and Singapore as providing an adequate level of protection for your personal data. To ensure that your personal data does receive an adequate level of protection even where there is no adequacy decision by the European Commission in place in respect of a country to which we transfer your personal information, we have put in place standard contractual clauses adopted by the European Commission to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects applicable laws on data protection. If you require further information about these protective measures, you can request it from the Compliance Officer (contact details below).

AUTOMATED DECISION-MAKING

Virtu Financial does not employ an automated decision-making system for the purposes of processing personal information.

WHAT ARE YOUR DATA PROTECTION RIGHTS?

Under certain circumstances in line with the GDPR, you have the following legal rights:



- **The right to access** – You have the right to request for copies of your personal data. We may charge a small fee for this service.
- **The right to rectification** – You have the right to request that we correct any information you believe is inaccurate. You also have the right to request us to complete information you believe is incomplete.
- **The right to erasure** – You have the right to request that we erase your personal data, under certain conditions.
- **The right to restrict processing** – You have the right to request that we restrict the processing of your personal data, under certain conditions.
- **The right to object to processing** – You have the right to object to our processing of your personal data, under certain conditions.
- **The right to data portability** – You have the right to request that we transfer the data we have collected to another organisation, or directly to you, under certain conditions.

If you want to review, verify, correct or request erasure of your personal data, object to the processing of your personal data or request that we transfer a copy of your personal data to another party, please contact a Compliance Officer in writing (contact details below).

RIGHT TO WITHDRAW CONSENT

Where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact a Compliance Officer (contact details below). Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

VIRTU REPRESENTATIVES

If you have any queries regarding this privacy notice, please contact a Compliance Officer by email at compliance-eu-reports@virtu.com.

RIGHT TO LODGE A COMPLAINT WITH A SUPERVISORY AUTHORITY

Should you wish to report a complaint or if you feel that we have not addressed your concern in a satisfactory manner, you may contact the relevant supervisory authority in your home country at any time.

CHANGES TO THIS PRIVACY NOTICE



We reserve the right to update this privacy notice at any time, and we will make the new privacy notice available to you on our website when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.