



Online Privacy Notice

Purpose

At ADM Investor Services International Limited (“ADMISI,” or “we,” or “us”), we are committed to protecting the privacy, accuracy and reliability of any personal information you provide, and to safeguarding such information from loss, misuse, unauthorised access, disclosure and alteration. This Online Privacy Notice (“Notice”) describes ADMISI’s current online practices regarding personal information collected through this website. ADMISI reserves the right to update or modify this Notice at any time.

Please take a few minutes to review this Notice. By accessing or using this site, you are consenting to the collection, use and disclosure of your personal information as set forth in this Notice. If you do not agree with these terms, please do not disclose any personal information to us.

Scope of This Notice

This Notice covers the personal information we collect through our sites. “Personal information” is any information that relates to you and identifies you personally, either alone or in combination with other information available to us.

Personal Information ADMISI Collects

ADMISI may collect various types of personal information about you. This may include the following categories:

Information that you provide voluntarily

- **Contact details** (e.g., email address, home and/or mobile phone number, home address, company, business contact information, country)
- **Identification information** (e.g., title, first and last name, date of birth)
- **Financial information** (e.g., bank account, customer credit score)
- **Enquiry information** (e.g., where you heard about us, the reason you are contacting us, your opinions/feedback about our services/products, your interests)

Information that we collect automatically

When you visit our website, we may collect certain information automatically from your device. In some countries, including countries in the European Economic Area (“EEA”), this information may be considered personal information under applicable data protection laws.

Specifically the information we collect may include information such as **web user information** (e.g., information collected via cookies and web beacons including Internet Protocol (IP) address, browser name, operating system details, domain name, date, time of visit, pages viewed), broad geographic location (e.g. country or city-level location) and other technical information. We may also collect information about how your device has interacted with our website, including the pages accessed and links clicked.

Collecting this information enables us to better understand the visitors who come to our website, where they come from, and what content on our website is of interest to them. We use this information for our internal analytics purposes and to improve the quality and relevance of our website to our visitors.

Some of this information may be collected using cookies and similar tracking technology, as explained further under the heading “Cookies”, below.

Choosing to not provide certain information may impact your use of certain resources. If you wish to have access to restricted areas of the site, you will be required to provide some personal information, including, but not limited to your name, email address and company name. Additionally, you will be given a username and password and will be required to provide them whenever you access the premium features on this website.

How ADMISI Uses Your Personal Information

ADMISI may use your personal information collected through our sites for various purposes. Generally, this may include the following:

- To provide products, information and services
- To better understand your needs and interests
- To improve content, functionality and usability of our sites
- For security, credit or fraud-prevention purposes
- For effective customer service
- To provide a personalised advertising experience when you visit our sites
- To provide information and notices related to your use of our sites
- To offer opportunities for participating in surveys and providing feedback to us

ADMISI may also use or disclose your personal information as follows:

- **Subsidiaries and affiliated companies:** ADMISI may share your personal information with subsidiaries and affiliated companies to provide the services you have requested. These subsidiaries and affiliated companies will handle your personal information in accordance with this Notice.
- **Unaffiliated third parties:** ADMISI may disclose your personal information to unaffiliated third parties who process information on behalf of ADMISI ('Data Processors') for the purpose of carrying out administrative, marketing, professional or technological support functions. In such instances, ADMISI shall restrict the third parties' use of the information and require that the third parties keep this information confidential and secure. In addition, we may disclose your personal information to an unaffiliated third party in the event of a sale, merger, reorganisation, liquidation or other similar event.
- **Business purposes:** ADMISI may use your personal information to process your requests to do business with ADMISI, such as processing a credit application, performing a background check based on reference information, managing ADMISI account information, facilitating trading and processing payments.

- **Brand awareness:** Where you are an existing client, or have otherwise specifically requested information on our products and services, ADMISI may use your personal information to make you aware of products and services that may be of interest to you. We may provide this information by post, telephone, fax, email or SMS. If you do not wish to receive such information, please see the Opt Out/Unsubscribe section below. Additionally, where you have specifically requested we do so, we may disclose your personal information to unaffiliated third parties with whom we enter into joint venture agreements, branding agreements or other strategic alliances, so that they may make you aware of their products and services that may be of interest to you.
- **Special circumstances:** Under certain special circumstances (e.g., responding to an emergency that is believed to threaten or harm an individual or property).
- **Courts, law enforcement agencies or other government agencies:** ADMISI may disclose your personal information to courts, law enforcement or other government agencies in order to comply with legal and regulatory requests. Such information may be disclosed to:
 - Protect your or ADMISI's legal claims and interests
 - Defend against potential or actual litigation
 - Abide by applicable law, regulation or contracts
 - Respond to a court order, administrative process or judicial process including, but not limited to, a search warrant.
- **Ownership transferees:** ADMISI reserves the right to share your personal information in the event it sells, licenses or transfers all or a portion of its business or assets. Should such a sale, lease (licensing) or transfer occur, ADMISI will direct the transferee to use your personal information in a manner that is consistent with this Notice.
- **As permitted by law:** ADMISI may be required to disclose personal information by law or legal process, for the administration of justice, to protect your vital interests, for investigation of breaches, for investigations by regulatory bodies, to protect the security or integrity of our databases or this website, to protect and defend the rights or property of ADMISI or our subsidiaries or affiliated companies, to protect the personal safety of ADMISI website users or to take precautions against legal liability. We reserve the right to contact appropriate authorities when activities that are illegal or violate our policies occur on an ADMISI website.

Your personal information will only be transferred if there is no reason to believe that you have an overwhelming interest to the contrary (e.g., if the information disclosure does not pose a high risk to you, or does not infringe upon your privacy).

Legal Basis for Processing Personal Information (EEA Visitors Only)

If you are a visitor from the EEA, our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

However, we will normally collect personal information from you only (i) where we need the personal information to perform a contract with you, (ii) where the processing is in our

legitimate interests and not overridden by your rights, or (iii) where we have your consent to do so. In some cases, we may also have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those of another person.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

If we collect and use your personal information in reliance on our legitimate interests (or those of any third party), this interest will normally be to operate our platform and communicating with you as necessary to provide our services to you and for our legitimate commercial interest, for instance, when responding to your queries, improving our platform, undertaking marketing, or for the purposes of detecting or preventing illegal activities. We may have other legitimate interests and if appropriate we will make clear to you at the relevant time what those legitimate interests are.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided under the '**Questions, Comments and Complaints**' heading, below.

Transferring Your Personal Information outside the EEA

Personal information collected on our website may be transferred outside of the EEA, such as to the United States or any other country where ADMISI or its affiliates, subsidiaries, business partners or service providers maintain facilities (such as to Chicago, Hong Kong, Taiwan, Singapore and Gibraltar).

We will endeavour to ensure that any personal information transferred is appropriately safeguarded in accordance with applicable law and this Notice. These measures include transferring your personal data to third parties who are located in a country which the European Commission has determined has data protection laws that are at least as protective as those in Europe, and transferring your personal data to third parties who have entered into standard contractual clauses with us. For more information about these safeguards please contact us using the contact details provided below. Please be aware that areas outside the European Economic Area may not have data protection laws as comprehensive as those that exist within it.

How ADMISI Protects Your Personal Information

ADMISI follows industry standards and practices to help protect the confidentiality and integrity of your personal information. ADMISI uses appropriate technical, organisational, administrative and physical measures to protect your personal information against accidental or intentional destruction, loss, alteration, unauthorised disclosure or access, and against other unlawful forms of collecting and processing information. When your personal information is shared, ADMISI will take a proactive approach to prevent the unauthorised use of the information.

Data Retention

We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

Your Data Protection Rights

If you are a resident of the EEA, you have the following data protection rights:

- If you wish to **access, correct, update or request deletion** of your personal information, you can do so at any time by contacting us using the contact details provided under the '**Questions, Comments and Complaints**' heading, below.
- In addition, you can **object to processing** of your personal information, ask us to **restrict processing** of your personal information or **request portability** of your personal information. Again, you can exercise these rights by contacting us using the contact details provided under the '**Questions, Comments and Complaints**' heading, below.
- Similarly, if we have collected and process your personal information with your consent, then you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the **right to complain to a data protection authority** about our collection and use of your personal information. For more information, please contact your local data protection authority.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

Safeguarding Children's Privacy

ADMISI does not knowingly collect personal information or any other identifying data from minors as defined by applicable law. Should a minor send us personal information, we will make every attempt to immediately delete that information from our database.

External Links

This website may provide links to external websites. When you click on one of these links, you will be transferred from this website and connected to the website of the organisation or company that you have selected. Even if an affiliation exists between ADMISI and such a website, ADMISI may not exercise any control over linked sites and we do not imply any endorsement of the activities of these websites. Unless specifically stated, this Notice does not govern the data collection and use practices of those websites.

If you visit a website that is linked from this website, please familiarise yourself with that site's privacy practices before providing any personal information.

Please note password-protected web sites managed by ADMISI that are linked from this site are restricted to our clients. For Terms and Conditions and the privacy statement, please refer to your Customer Agreement.

Cookies

This website may also automatically gather certain information through the use of 'Cookies'. A cookie is a text-only string of information that is transferred to the cookie file of the browser on your computer's hard disk so that we can recognise you as a repeat visitor.

A cookie will typically contain the name of the domain from which the cookie has come, the 'lifetime' of the cookie, and a value, usually a randomly generated, unique number.

Cookies set by the website owner, ADMISI are called "first party cookies". Cookies set by parties other than the website owner are called "third party cookies". Third party cookies enable third party features or functionality to be provided on or through the website (e.g. like advertising, interactive content and analytics). The parties that set these third party cookies can recognise your computer both when it visits the website in question and also when it visits certain other websites. We use first party and third party cookies for several reasons. Some cookies are required for technical reasons in order for our website to operate, and we refer to these as "essential" or "strictly necessary" cookies. Other cookies also enable us to track and target the interests of our users to enhance the experience on our website.

Cookies are commonly used by most major websites to arrange their content to match your preferred interests. The cookies we use cannot, by themselves, identify you.

The following type of cookies are used on this web site:

Session cookies

These are temporary cookies that remain in the cookie file of your browser until you close the browser. We use session cookies to allow you to carry information across the pages of our site, thus avoiding the need for you to re-enter information.

Analytical cookies

The cookies we use are 'analytical' cookies. They allow us to recognise and count the number of visitors to see how visitors move around the site when using it. This helps us to improve the way our website works, for example by making sure users are finding what they need easily.

Google Analytics

Some third-party services providers that we engage (including third-party advertisers) may also place their own Cookies on your hard drive. We may also permit third-party vendors, such as Google, to use cookies to serve you ads based on your past visits to our Website. Our vendors show our ads on websites across the Internet; however, our vendors may specifically serve you ads for the services on other websites if you have previously visited our website.

- You can opt out of Google's use of cookies by visiting Google's Ads Settings (<http://www.google.com/settings/ads>).

- You can also opt out of other third-party vendors' use of cookies by visiting the Network Advertising Initiative opt-out page (http://www.networkadvertising.org/managing/opt_out.asp). Note that this Cookie Notice covers only our use of Cookies and does not include use of Cookies by such third parties.

How To Manage Cookies Stored on Your Computer

There are a number of ways to manage cookies. Some modern browsers have a feature that will analyse website privacy policies, compare it to your pre-selected privacy preferences and prompt or alert you when these do not match. These capabilities, known as 'P3P' features (Privacy Preferences Platform), can be activated before you begin to surf the Internet. To determine if your web browser supports 'P3P' features and how to activate them please, refer to the 'Help' function of your web browser for guidance.

You can easily delete any cookies that have been installed in the cookie folder of your browser. For example, if you are using Microsoft Windows Explorer:

Open 'Windows Explorer'
Click on the 'Search' button on the tool bar
Type 'cookie' into the search box for 'Folders and Files'
Select 'My Computer' in the 'Look In' box
Click 'Search Now'
Double click on the folders that are found
'Select' any cookie file
Hit the 'Delete' button on your keyboard

If you are not using Microsoft Windows Explorer, then you should select 'cookies' in the 'Help' function for information on where to find your cookie folder. You also have the option of restricting the placing of these cookies on your computer by altering the security settings of your web browser. Before altering any settings on your computer, you are strongly advised to familiarize yourself with this task by referring to the 'Help' function for further information. You are also advised that totally disabling cookies may affect your ability to navigate this and certain other sites.

Please note if you access this website from different computers in different locations, you will need to ensure that each browser is adjusted to suit your cookie preferences.

Governing Law

This Notice forms part of our website Terms of Use and as such shall be governed by and construed in accordance with the laws of England and Wales. You expressly agree to submit to the exclusive jurisdiction and venue of the courts in England and Wales in all disputes arising out of or relating to the use of this website.

Opt Out/Unsubscribe

ADMISI may use your personal information to send you marketing information from time to time. You can exercise your right to opt-out of marketing communications by clicking on the 'unsubscribe' or 'opt-out' link in the marketing emails that we send to you. Alternatively, to opt out of other forms of marketing (such as via phone), or if you want to be removed from our mailing list, please email unsubscribe.me@admisi.com.

To inform us of inaccuracies or changes to your personal information, please [click here](#) or use the below information to contact ADMISI. In accordance with applicable law, ADMISI will update, grant access to or delete such information. Requests to correct or delete personal information are subject to applicable legal, ethical reporting or document retention obligations imposed on us.

Questions, Comments and Complaints

You may use the contact information below to exercise your rights under the heading 'Your Data Protection Rights', above.

You may also submit a general privacy-related inquiry or complaint in accordance with applicable laws and regulations. Requests are sent to the person in ADMISI who is responsible for privacy policies and practices. ADMISI will respond to such requests in accordance with applicable laws.

Please issue such requests by contacting the Data Protection Committee at:

The Compliance Officer
ADM Investor Services International Limited
4th Floor, Millennium Bridge House, 2 Lambeth Hill
London EC4V 3TT
United Kingdom

Phone: + 44 207 716 8124

Fax: + + 44 207 294 0224

E-mail: compliance@admisi.com

Please provide your name and contact information along with your request.

In the unlikely event the Compliance Officer is unable to resolve the issue you may also contact the Office of Compliance and Ethics at our parent company:

FAO Vice President, Compliance and Ethics
Archer Daniels Midland Company
P.O. Box 9000, Decatur, IL 62525
Phone: (217) 424-4-WAY [217-424-4929]
Phone: (888) 4-ADMISI-WAY [888-423-6929]
E-mail: compliance@adm.com

Updates to this Privacy Notice

From time to time we may update this Privacy Notice. When we do we will publish the changes on this website. If you do not agree to these changes, please do not continue to use the website. If material changes are made to this Privacy Notice, we will notify you by e-mail or by placing a prominent notice on the website.

This Privacy Notice was last updated on 25th May 2018