1. Who We Are and How to Contact Us

Credit Financier Invest Limited ("CFI UK", "we", "us" or "our") is a company registered in England and Wales (Company Number 11634673) and authorised and regulated by the Financial Conduct Authority (FCA) under FRN 828955. Our registered office is at 16 Berkeley Street, London, W1J 8DZ.

CFI UK is the data controller in respect of personal data processed under this Privacy Notice. This means we determine the purposes for which and the means by which your personal data is processed.

If you have any questions about this Privacy Notice or wish to exercise any of your rights (see Section 9), please contact us at:

- Email: uk@cfi.trade
- Post: Compliance Department, 16 Berkeley Street, London, W1J 8DZ
- Telephone: +44 (0)20 3907 4131/2

For data protection queries specifically, please contact: gdpr.uk@cfi.trade.

You also have the right to lodge a complaint with the UK supervisory authority, the Information Commissioner's Office (ICO), at any time: www.ico.org.uk.

2. Scope of This Privacy Notice

This Privacy Notice applies to the processing of personal data by CFI UK in connection with:

- your use of our website at https://cfi.trade (the "Website");
- your application to open a trading account with us;
- your ongoing relationship with us as a client or prospective client; and
- any other dealings you have with CFI UK.

This Privacy Notice does not apply to websites operated by third parties, including those linked from our Website. We are not responsible for the privacy practices of such third parties and encourage you to read their privacy policies.

Our Website and services are intended for persons of legal trading age only. If you are under 18, please do not provide us with any personal data. If we become aware that we have collected personal data from someone under 18 without appropriate consent, we will take steps to delete that information without undue delay. Parents or guardians who believe a minor has provided us with personal data should contact us at uk@cfi.trade.

3. The Governing Legal Framework

We process your personal data in accordance with:

- the UK General Data Protection Regulation ("UK GDPR") as it forms part of the law of England and Wales, Scotland and Northern Ireland by virtue of section 3 of the European Union (Withdrawal) Act 2018 and as amended by the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019;
- the Data Protection Act 2018 ("DPA 2018"); and
- any other applicable legislation relating to the processing of personal data and privacy.

References in this Privacy Notice to "UK GDPR" are to that retained and amended legislation. We do not process personal data under the EU GDPR, which is a separate instrument applicable within the European Union.

4. Personal Data We Collect

Depending on how you interact with us, we may collect the following categories of personal data:

Category of Personal Data	Description and Examples
Identity Data	Full name, date of birth, place of birth, gender, nationality, citizenship, copies of identity documents (e.g. passport, driving licence, national identity card).
Contact Data	Residential address, email address, telephone and mobile numbers.
Verification & Documentary Data	Proof of residence documents (e.g. utility bills, bank statements), source of funds documentation (e.g. payslips, tax returns, financial statements).
Financial Data	Income, assets and liabilities, employment status, bank account details, e-wallet and payment card details, FATCA and CRS information, tax residence and tax identification number.
PEP & Sanctions Data	Information as to whether you hold or have held a prominent public function, or are connected to someone who does; screening results against UK and international sanctions lists.
Trading Account & Activity Data	Account balances, trading history, order and transaction records, knowledge and experience in financial instruments, risk tolerance and risk profile.
Appropriateness Assessment Data	Responses to our appropriateness questionnaire, including your knowledge of and experience with CFDs, spread bets and other complex instruments.
Communications Data	Records of correspondence, telephone calls, live chat, emails and other communications with us. Calls and electronic communications may be recorded and retained for regulatory and quality assurance purposes.
Technical & Device Data	IP address, browser type, device type and identifiers, operating system, mobile application identifier (where applicable).
Online Activity Data	Cookie data, date, time and duration of website sessions, pages visited. Please see our Cookies Policy for further detail.
Demo Account Data	First and last name, email address, mobile number (collected if you register for a demo account).

We may also collect personal data about you from third parties where this is necessary for our regulatory obligations or to verify information you have provided. Such third parties may include identity verification agencies, credit reference agencies and sanctions screening providers.

We do not collect special categories of personal data (as defined in Article 9 UK GDPR) in the ordinary course of our business. If, in exceptional circumstances, such data were to come to our attention, we would ensure an appropriate lawful basis existed before processing it.

5. How and Why We Use Your Personal Data

The UK GDPR requires us to have a lawful basis for each processing activity. We rely on the following lawful bases depending on the purpose for which your data is used:

5.1 Contract Performance (Article 6(1)(b) UK GDPR)

We process personal data where this is necessary to enter into or perform our contract with you, including:

- assessing your application to open a trading account;
- onboarding you as a client, including conducting our appropriateness assessment under COBS 10A;
- administering and managing your trading account;
- executing your orders and providing execution-only services;
- communicating with you about your account, trades and related matters; and
- processing deposits and withdrawals via payment service providers.

5.2 Legal Obligation (Article 6(1)(c) UK GDPR)

We process personal data where this is necessary to comply with our legal and regulatory obligations, including:

- customer due diligence (CDD) and enhanced due diligence (EDD) under the Money Laundering Regulations 2017 (as amended);
- ongoing transaction monitoring and source of funds verification;
- screening against UK and international sanctions lists under obligations imposed by OFSI and HM Treasury;
- suspicious activity reporting under the Proceeds of Crime Act 2002 and the Terrorism Act 2000;
- record-keeping obligations under FCA rules (including COBS, SYSC and MAR);
- regulatory reporting to the FCA, including transaction reporting and STORs; and
- tax reporting obligations including FATCA, CRS and disclosure to HMRC.

5.3 Legitimate Interests (Article 6(1)(f) UK GDPR)

We process personal data where this is necessary for our legitimate interests (or those of a third party), provided your interests and fundamental rights do not override those interests. We rely on this basis for:

- market abuse surveillance and monitoring of orders and transactions under UK MAR;
- fraud prevention and the security of our systems and services;
- improving and developing our services and products;
- recording and monitoring communications for quality assurance and dispute resolution; and
- direct marketing of our own products and services to existing clients by non-electronic means, where you have not opted out.

Where we rely on legitimate interests, we have carried out a Legitimate Interests Assessment to ensure our interests do not override your rights and freedoms. You have the right to object: see Section 10.

5.4 Consent (Article 6(1)(a) UK GDPR)

We rely on your consent for:

- sending you electronic marketing communications (email, SMS) about our products and services, where you have opted in; and
- placing non-essential cookies on your device (see our Cookies Policy).

You may withdraw consent at any time by contacting us at gdpr.uk@cfi.trade or using the unsubscribe link in any marketing email. Withdrawal of consent does not affect the lawfulness of processing carried out before withdrawal.

If you do not provide personal data required for us to comply with a legal obligation or perform our contract with you, we may be unable to open an account or continue providing services to you.

6. Automated Decision-Making

We use an automated appropriateness assessment as part of our client onboarding process, as required under FCA rules (COBS 10A) for execution-only firms offering complex products such as CFDs and spread bets.

You complete a questionnaire covering your knowledge and experience of financial instruments. Your responses are assessed against a defined scoring framework to determine whether you meet our minimum criteria. If you do not meet the criteria, you will be informed and will not be permitted to open a live trading account.

This constitutes solely automated decision-making that produces a legal or similarly significant effect under Article 22 UK GDPR. You have the right to:

- request human review of the automated outcome — please contact gdpr.uk@cfi.trade;
- express your point of view regarding the decision; and
- contest the decision if you believe the outcome was incorrect based on your actual knowledge and experience.

7. Who We Share Your Personal Data With

We do not sell, rent or trade your personal data. We may share it only in the following circumstances:

7.1 Service Providers

We share personal data with carefully selected third-party service providers who process data on our behalf, including identity verification providers, payment service providers, CRM and technology platform providers, and auditors and legal advisers. All processors are subject to written data processing agreements.

7.2 Regulatory and Law Enforcement Authorities

We may disclose personal data to the FCA and other regulatory authorities, HMRC (including for FATCA and CRS reporting), the NCA (in connection with suspicious activity reports), OFSI, courts and tribunals, and law enforcement agencies where required by law.

7.3 UK EMIR Trade Repositories

Where required under UK EMIR, we may report details of derivative transactions to a registered UK trade repository.

7.4 Other Disclosures

We may also share personal data with execution venues (where necessary to resolve trade disputes), legal advisers and the Financial Ombudsman Service (in connection with complaints), and in connection with any business sale, merger or restructuring.

8. International Transfers of Personal Data

Your personal data may be transferred to and processed in countries outside the United Kingdom. Where we transfer personal data to a third country, we ensure appropriate safeguards are in place under UK GDPR Chapter V, including:

- transfers to countries benefiting from a UK adequacy regulation under Article 45 UK GDPR;
- the use of International Data Transfer Agreements (IDTAs) approved by the ICO; or
- the use of an addendum to EU Standard Contractual Clauses, as approved by the ICO.

You may request further information about safeguards for a specific transfer by contacting us at gdpr.uk@cfi.trade.

9. How Long We Keep Your Personal Data

We retain personal data only for as long as necessary for the purposes for which it was collected and to comply with our legal and regulatory obligations:

Data Category & Legal Basis for Retention	Retention Period
AML/CDD Records (MLR 2017, Reg. 40)	5 years from end of business relationship or occasional transaction.
Transaction & Order Records (COBS / retained MiFID II rules)	5 years from date of transaction (or 7 years where directed by the FCA).
Communications Records — voice, email, electronic (COBS / MAR)	5 years from date of communication (or 7 years where directed by the FCA).
Client Account Records	5 years from account closure or end of relationship.
Complaints Records (DISP)	3 years from date complaint closed.
Marketing Consent Records	Duration of consent plus a reasonable period for evidence purposes.

At the end of the applicable retention period, personal data is securely deleted or anonymised. The right to erasure does not apply where we are required by law to retain your data.

10. Your Rights

Under the UK GDPR you have the following rights in relation to your personal data. We will respond to all valid requests within one month, extendable by two further months for complex requests. To exercise any right, please contact us at gdpr.uk@cfi.trade. We may ask you to verify your identity before responding.

Your Right	What This Means
Right of Access (Article 15)	Request confirmation of whether we process your personal data and a copy of the data we hold, together with supplementary information about how it is used.
Right to Rectification (Article 16)	Request correction of inaccurate or incomplete personal data.
Right to Erasure (Article 17)	Request deletion of your personal data in certain circumstances. This right does not apply where we are required by law to retain it.
Right to Restrict Processing (Article 18)	Request restriction of processing in certain circumstances, for example where you contest the accuracy of the data.
Right to Data Portability (Article 20)	Where processing is by automated means on the basis of consent or contract, request your data in a structured, machine-readable format or ask us to transmit it to another controller.
Right to Object (Article 21)	Object to processing based on legitimate interests. You have an absolute right to object to direct marketing.
Rights re Automated Decisions (Article 22)	Request human review of automated decisions, express your view and contest the outcome. See Section 6.
Right to Withdraw Consent (Article 7(3))	Withdraw consent at any time without affecting the lawfulness of prior processing.

If you are dissatisfied with our response, you have the right to lodge a complaint with the ICO at www.ico.org.uk.

11. Cookies

Our Website uses cookies and similar tracking technologies. We use strictly necessary cookies (which do not require consent), and functional, analytics and marketing cookies (which require your prior consent via our cookie consent banner).

Full details of the cookies we use, their purposes, durations and how to manage your preferences are set out in our Cookies Policy, available on the Website.

12. Security

We have implemented appropriate technical and organisational measures to protect your personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access. These include data encryption, access controls, clean desk policies, business continuity procedures and staff training.

In the event of a personal data breach likely to result in a risk to your rights and freedoms, we will notify the ICO without undue delay and within 72 hours where feasible (Article 33 UK GDPR). Where the breach is likely to result in a high risk to your rights and freedoms, we will also notify you directly (Article 34 UK GDPR).

13. Changes to This Privacy Notice

We may update this Privacy Notice from time to time. Where we make material changes, we will notify you by email or by a prominent notice on our Website prior to the change becoming effective. The current version is always available at https://cfi.trade.

14. Governing Law

This Privacy Notice is governed by the laws of England and Wales. Any disputes shall be subject to the exclusive jurisdiction of the courts of England and Wales.

15. Contact Us

For any questions, concerns or requests relating to this Privacy Notice or the processing of your personal data, please contact us:

Email: gdpr.uk@cfi.trade

General enquiries: uk@cfi.trade

Post: Compliance Department, Credit Financier Invest Limited, 16 Berkeley Street, London, W1J 8DZ

Telephone: +44 (0)20 3907 4131/2

ICO: www.ico.org.uk | 0303 123 1113

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