



Privacy Policy

BlackBull Group Limited

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Privacy Policy

BlackBull Markets (Black Bull Group Limited) is committed to protecting your privacy and safeguarding your personal information. The following Privacy Policy governs how we handle and secure your personal data.

We encourage everyone to read through our policy to better understand our commitment to your security. If you have any questions or concerns, please feel free to contact our friendly customer support at support@blackbullmarkets.com or our Compliance Team at compliance@blackbullmarkets.com

Minor discrepancies to GDPR Requirements:

BlackBull Markets complies to all GDPR requirements. Additionally, we want our policy information clear and concise. As such, despite the following being legally allowed, we would like our Clients (you) to be fully informed.

Please be aware that BlackBull Markets withholds personal data that has been submitted via informed consent to us by our Clients, for seven (7) years after the final action undertaken by that client on our system.

This is done so that BlackBull Markets complies with the Financial Markets Conduct Act (2013) Subpart 4 section 227(1)(a). The referenced Law is a New Zealand Legal Act that regulates and governs the Financial industry and all participating entities in New Zealand.

While this may seem to contradict the sentiment of the GDPR, under GDPR Article 6(1)(c), BlackBull Markets' New Zealand stipulated legal requirement to keep this information is supported. As such, we will not seek explicit consent for this.

Information Collected by BlackBull Markets:

The categories of non-public personal information which BlackBull Markets will collect include;

1. Information provided by the Client when opening a BlackBull Markets Account, specifically and limited to:
 - a. Full Name
 - b. Last Name
 - c. Email Address
 - d. Mobile Number
 - e. Address information articles, specifically; Street, City, State, Postcode and Country
 - f. Date of Birth
 - g. Estimated Annual Gross Income
 - h. Net Worth
 - i. Source of Funds
 - j. Purpose of Trading
2. Documents provided by the Client used to verify the identity of the Client. These documents consist of a Proof of Address Document, and a Proof of Identity Documents. Information stored from these documents is specifically limited to:
 - a. Name
 - b. Date of Birth
 - c. Identification reference numbers, e.g. Passport Number, ID Number, or equivalent

3. Information resulting from transactions between the customer and BlackBull Markets or an affiliate of BlackBull Markets, such as withdrawal and deposit forms, this includes:
 - a. All information received by BlackBull Markets upon receiving a transaction
 - b. All information required for BlackBull Markets to send or process a transaction

Please note that our Payment Processing services are hosted or provided by ANZ New Zealand, Neteller, Skrill, or Union Pay. Depending on the withdrawal or deposit method you chose, only the required data will be sent to the Payment Processing entity. Additionally, all these providers comply to the GDPR.

4. Information derived from customer's navigation and usage of BlackBull Markets (cookies) website and online platforms, including Account trading statements.

Usage of Personal Information:

BlackBull Markets will use the information collected from you to verify your identity and contact information. This includes using background checking services. These are listed under Data Controllers later in this document.

BlackBull Markets will use this information to, upon your request, establish and setup your Live Trading Account or Demo Trading Account, issue an account number and a secure password, maintain your account, and contact you with account information.

Your information will be used to contact you to inform you of any significant Market changes, changes in services provided, changes in pricing, or any changes relating to your data

Should you close your account, BlackBull Markets will retain your information, but only use it to comply with regulatory requirements and to periodically contact you to offer you the opportunity to reactivate your account or participate in other valuable offers. This is covered in further detail in the initial section of this policy document

Disclosed Information:

BlackBull Markets may share information with affiliates if the information is required to provide the product or service you have requested, or to provide you the opportunity to participate in the products or services our affiliates offer.

Except for the limited circumstances described below or as otherwise permitted by law, BlackBull Markets does not share or sell non-public personal information about our current or former customers with any third parties.

1. When a client is referred by an Introducing Broker, BlackBull Markets generally shares non-public personal information concerning the account opening and maintenance process with the introducing broker who made the referral. No further information will be disclosed without your consent. Furthermore you will be informed of other Clients referencing your data to us.
2. BlackBull Markets may engage another business or person to help us identify client and demo user needs and notify clients and demo users of product and service offerings. Use of the information shared is limited to the performance of the task we request and is not used for any other purpose. These third parties are required to enter into a Non-Disclosure Agreement with BlackBull Markets to safeguard the confidentiality of personal information before they provide such services. Examples of the types of information BlackBull may share are identifying

information, such as, name, mailing address, e-mail address and telephone number and information on account activity.

3. BlackBull Markets may provide information to non-affiliated third parties, as permitted by law, in providing financial services to you. This includes a consumer reporting agency that prepares your credit report.
4. BlackBull Markets may provide information, as permitted by law, to government or regulatory agencies and to comply with a legal summons, court order, subpoena or a similar legal process, audit or investigation.
5. BlackBull Markets may also disclose your non-public personal information if you authorize such disclosure.

Data Controllers:

Each selected Data Controller will treat your Personal Data in accordance with their own Privacy Policy (which is published on every carrier's website). Disclosure of Personal Data to other service providers will be done in accordance with the applicable Personal Data laws and regulations, and only when completely necessary. Our Data Controllers include:

1. PrimeXM DMCC
2. TempleFX China
3. TempleFX UK
4. Neteller
5. Skrill
6. Payment Asia Technology Limited
7. ANZ Bank New Zealand
8. Thompson and Reuters
9. Trulioo
10. MyFXBook
11. Psyquation
12. Beeks Financial Cloud
13. SwipeStox
14. TradeSocio Limited
15. ZuluTrade
16. Salesforce Inc
17. Kenmore Design LLC
18. Plugit Limited
19. MetaQuotes Software Corporation
20. New Zealand Government AML/CFT bodies and associated agencies (FMA, FIU etc.)

If you do not wish to have BlackBull Markets share non-public personal information with non-affiliated third parties pursuant to any of the provisions listed above, please opt out of those provisions by sending an e-mail to: compliance@blackbullmarkets.com. Opting out will apply for all financial products or services you obtain through BlackBull Markets.

Please note that you cannot opt out of any provisions if sharing of the information is required by law.

Confidentiality and Security Procedures:

Only those staff members for whom the information is necessary to complete a given transaction shall possess the authority to access the information. BlackBull Markets, its personnel, and its affiliates shall strictly adhere to security practices and procedures to ensure the confidentiality of its customers' information.

BlackBull Markets maintains numerous safeguards that comply with government regulations to guard your non-public personal information including the use of encryption technology, firewalls and authentication systems (usernames and passwords).

BlackBull Markets will continue to protect the privacy of former customers' non-public personal information in the same manner as when they were customers. Unlike current customers, however, former customers will not receive annual privacy notices.

BlackBull Markets will provide a notice of change for any alterations to our privacy policy when necessary, as long as the customer maintains an account with BlackBull Markets. BlackBull Markets reserves the right to make changes to this policy. Policy is permanently available at:

www.blackbullmarkets.com/our-company/corporate-governance/legal-policies/

Cookies:

BlackBull Markets may set cookies and other data capture mechanisms on your computer that allow us to store data about your visit. Cookies help us learn which areas of our site are useful and which areas need improvement. You may configure your browser to prevent cookies from being set on your computer. If you do so, you may still access the website, but certain features may be disabled and/or not function properly.

Our website contains cookies that will do the following:

1. Cookies that are strictly necessary for the operation of our website and provision of our services (these cannot be turned off)
2. So-called "performance cookies", i.e. cookies that we use for statistics in order to improve our services such as Live Chat
3. Cookies used for Marketing purposes

Personal Data Access:

Access to the Personal Data we may hold about you. You have the right to request a copy of the data we hold about you and to have any inaccurate data about you corrected. You can do this at no cost to yourself and we try to complete all Data Correction/Access/Deletion requests within 48 working hours. For more information, please send an email to: compliance@blackbullmarkets.com

Opt Out

You are not required to supply any of the personal information that we may request. However, failure to do so may result in BlackBull Markets not being able to open or maintain your account.

Kind Regards,

The BlackBull Markets team