

XTX MARKETS

PRIVACY NOTICE FOR THIRD PARTIES (UK, EUROPE & SINGAPORE)



1 Scope

1.1 Purpose

This privacy notice explains how and why XTX Markets Technologies Limited and its UK, European and Singapore affiliates (“**XTX**”) collects, uses, processes and discloses the personal data of third parties with whom it interacts, including but not limited to, job applicants, service providers, service recipients, visitors to XTX premises, clients and any other third parties with whom XTX interacts (“**You**” or “**Your**”).

1.2 How We Collect Your Data

We may collect your personal data through one or more of the following methods:

- **Directly from you.** Information provided by you whilst interacting with XTX (whether electronically or in person).
- **From your employer or representatives** e.g. account managers, recruitment agencies, referees, or legal advisers or family members.
- **From publicly available sources.** e.g., company websites, regulatory registers, social media and business directories.
- **Indirectly from third parties (including services providers).** Information obtained from external companies, background check agencies, regulatory bodies, or third-party providers.
- **Through automated systems.** Data generated or captured by workplace technologies and building security systems (e.g. access logs).
- **From communications and activities.** Emails, meeting notes, contract documents, invoices and payment records.
- **Compliance and legal processes.** Data collected to fulfil legal obligations, such as for KYC and AML purposes.
- **Surveillance systems.** Data collected by CCTV cameras and building security systems (e.g. access logs and CCTV).
- **Company initiatives:** Information shared as part of wellness programs, diversity monitoring, or staff surveys.

1.3 Lawful Basis for Processing Personal Data

Under both the UK General Data Protection Regulation and the EU General Data Protection Regulation (as applicable, “**GDPR**”), as well as the Personal Data Protection Act 2012 of Singapore (“**PDPA**”), we process your personal data pursuant to the following lawful bases:

- **Performance of a Contract (Article 6(1)(b) GDPR; Section 15 PDPA).** We process personal data where it is necessary for the performance of a contract to which you are a party or to take steps at your request prior to entering into a contract (e.g. in connection with employment contracts).
- **Legal Obligation (Article 6(1)(c) GDPR; Section 13(b) PDPA).** We process personal data where it is necessary to comply with legal obligations.
- **Legitimate Interests (Article 6(1)(f) GDPR; First Schedule to PDPA).** Necessary for XTX’s legitimate business interests unless overridden by your fundamental rights and freedoms.
- **Consent (Article 6(1)(a); Section 13(a) PDPA).** Where you provide consent for specific processing activities.
- **Special Category Data (Article 9(2)).** Processing sensitive personal data is carried out under the specific conditions set out in Article 9(2) of GDPR, such as:
 - Article 9(2)(a): Where you have given explicit consent to the processing of your personal data for one or more specified purposes;
 - Article 9(2)(b): To meet employment law obligations, for instance, providing reasonable adjustments for disabilities;
 - Article 9(2)(e): Where processing is necessary for the establishment, exercise or defence of legal claims; and
 - Article 9(2)(h): For occupational health and safety purposes, such as ensuring fitness for work.
- **Criminal Conviction Data (Article 10):** Relating to criminal record checks where required by law or with your consent.

1.4 Changes to this Privacy Notice

XTX may amend this privacy notice from time to time and the most recent version will be published on XTX’s website.

2 Personal Data Processed by XTX

2.1 Standard Data Processed by XTX

The tables below set out the types of personal data that may be processed, the purposes for which the data is processed, and the lawful basis relied upon for such processing.

2.1.1 General

Purpose of Processing	Examples of Data Processed	Lawful Basis
Facilitating business relationships	Name, business contact details, job title, organisation, contractual terms, correspondence	Legitimate Interests (Article 6(1)(f) GDPR; First Schedule to the PDPA)
Contractual Performance	Name, business contact details, job title, organisation, contractual terms, correspondence	Legitimate Interests (Article 6(1)(f) GDPR; First Schedule to the PDPA) if no direct contractual relationship exists between the controller and the data subject; Performance of a contract (Article 6(1)(b) GDPR; Section 15 PDPA) if there is a direct contractual relationship between the controller and the data subject or if the data subject requests steps to be taken prior to entering into such contract.
Compliance, regulatory and legal obligations	AML and sanctions screening results, regulatory status, contractual records	Legitimate Interests (Article 6(1)(f) GDPR; First Schedule to the PDPA) and Legal Obligation (Article 6(1)(c) GDPR; Section 13(b) PDPA)
Prevention and detection of fraud or misuse	Transaction records, device and network logs, fraud screening data	Legitimate Interests (Article 6(1)(f) GDPR; First Schedule to the PDPA)

2.1.2 Recruitment

Purpose of Processing	Examples of Data Processed	Lawful Basis
Recruitment: assessing candidates	CVs, application forms.	Legitimate Interests (Article 6(1)(f) GDPR; First Schedule to the PDPA): Assessing the suitability of a candidate's experience for the role. We may use an AI-powered Talent Matching tool to compare the application against our job requirements. We will not however make any automated decision based on this matching without a human review. When we use this tool for a role, further information is available on the Greenhouse job page for such role.

		Where the PDPA applies: Deemed consent (Section 15 PDPA)
Recruitment and onboarding (for applicants or recruitment contacts)	CVs, application forms, interview notes, references, right-to-work documents	<p>Legitimate Interests (Article 6(1)(f) GDPR; First Schedule to the PDPA) if no direct contractual relationship exists between the controller and the data subject;</p> <p>Performance of a contract (Article 6(1)(b) GDPR; Section 15 PDPA) if there is a direct contractual relationship between the controller and the data subject or if the data subject requests steps to be taken prior to entering into such contract.</p> <p>and</p> <p>Legal Obligation where right-to-work checks apply (Article 6(1)(c) GDPR)</p> <p>Where the PDPA applies: Deemed consent (Section 15 PDPA)</p>
Background, screening and eligibility checks	References, background checks, criminal record checks (where lawful), qualification checks	<p>Legal Obligation (Article 6(1)(c) GDPR; Section 13(b) PDPA)</p> <p>and</p> <p>Criminal Convictions Data (Article 10) where applicable</p>

2.1.3 Visitors to XTX Premises

Purpose of Processing	Examples of Data Processed	Lawful Basis
Onsite security and access control	Visitor sign-in details, ID scans, access logs, CCTV footage	Legitimate Interests (Article 6(1)(f) GDPR; First Schedule to the PDPA) and Legal Obligation where required
Health & safety and incident reporting	Health information necessary for safe access, accident reports	<p>Legal Obligation (Article 6(1)(c) GDPR; Section 13(b) PDPA)</p> <p>and</p> <p>Health & Safety (Article 9(2)(h) GDPR; First Schedule to the PDPA) or explicit consent where appropriate</p>

2.1.4 Clients and Counterparties

Purpose of Processing	Examples of Data Processed	Lawful Basis
Contract performance and account management	Contract terms, correspondence, invoicing, payment and bank details, trading activity records	Contractual Obligation (Article 6(1)(b) GDPR; Section 15 PDPA)

Compliance, AML, sanctions and regulatory checks	KYC information, sanctions screening results, regulatory status	Legal Obligation (Article 6(1)(c) GDPR; Section 13(b) PDPA)
Dispute resolution and legal defence	Correspondence, contract and transactional records, investigation documents	Legitimate Interests (Article 6(1)(f) GDPR; First Schedule to the PDPA)

2.1.5 Staff Dependants

Purpose of Processing	Examples of Data Processed	Lawful Basis
Contact and emergency information	Names, relationship to staff, contact details, next of kin information	Legitimate Interests (Article 6(1)(f) GDPR; First Schedule to the PDPA) Contractual Obligation (Article 6(1)(b) GDPR; Section 15 PDPA) Health & Safety / Article 9(2)(h) GDPR; First Schedule to the PDPA
Health & welfare Information related to staff dependants	Health information provided to support staff (e.g., carers, dependants) where relevant to benefits or emergency response	Explicit Consent (Article 9(2)(a) GDPR; Section 13(a) PDPA) or Health & Safety / Article 9(2)(h) GDPR; First Schedule to the PDPA
Benefits administration (where dependants are beneficiaries)	Dependant details for pension or benefits, bank details for payments where applicable	Contractual Obligation (Article 6(1)(b)) and Legal Obligation (Article 6(1)(c))

2.2 Special Category Data Processed by XTX

XTX may from time to time, where permitted by applicable law, determine that it is necessary to collect and process certain types of “**Special Category Data**” (as defined below).

For the purposes of this privacy notice, “**Special Category Data**” shall mean personal data revealing:

- Racial or ethnic origin;
- Political opinions;
- Religious or philosophical beliefs;
- Trade union membership;
- Genetic data;
- Biometric data for the purpose of uniquely identifying a natural person;
- Data concerning health; or
- Data concerning a natural person’s sex life or sexual orientation.

XTX will only process Special Category Data where it determines that it is in the best interest of (i) the applicable data subject; and/or (ii) XTX, in each case, provided that it is permitted by applicable law to carry out such processing.

2.2.1 General

Purpose of Processing	Examples of Data Processed	Lawful Basis
Health, safety and wellbeing where required for site access or incident response	Health data (e.g., medical conditions disclosed to enable safe site access, first-aid records)	Article 9(2)(h) GDPR; First Schedule to the PDPA (health & safety) or Article 9(2)(a) GDPR; Section 13(a) PDPA (explicit consent) where appropriate

2.2.2 Recruitment

Purpose of Processing	Examples of Data Processed	Lawful Basis
N/A	N/A	N/A

2.2.3 Visitors to XTX Premises

Purpose of Processing	Examples of Data Processed	Lawful Basis
Health information for safe access or emergency response	Health disclosures necessary for temporary access or emergency assistance (e.g., mobility needs)	Article 9(2)(h) GDPR; First Schedule to the PDPA (health & safety) or Article 9(2)(a) GDPR; Section 13(a) PDPA (consent)

2.2.4 Staff Dependents

Purpose of Processing	Examples of Data Processed	Lawful Basis
Staff Dependents	Health and welfare information needed for emergency response or staff benefits administration.	Health data of dependants disclosed by staff for emergency contact, care needs, or benefits eligibility

3 Data Transfers and Sharing of Personal Data

3.1 Internal Transfers.

XTX is a globally integrated business, with teams and offices working seamlessly across different regions to support XTX's operations and objectives. To ensure efficient administration and the effective delivery of services, personal data may be shared internally within XTX, including with teams, offices, and functions in other countries to facilitate, among other things:

- The provision of intragroup services and support.
- Recruitment and onboarding processes.
- Compliance with legal obligations and/or internal policies.
- Contract management and service delivery;
- Procurement and vendor management;
- Compliance and risk management;
- Business development and client support.

All employees, contractors, and affiliates of XTX are required to follow strict data privacy and security policies when processing or handling personal data. Any data sharing within XTX will only occur on a need-to-know basis and such transfers will only be made where permissible to do so under applicable data protection laws.

3.2 External Transfers.

XTX may share your personal data with certain trusted external parties, which may include:

- **Service Providers:** Such as IT and cloud service providers, payroll processors, recruitment agencies, and other vendors supporting operational functions.
- **Regulatory Authorities:** Including government bodies, tax authorities, or law enforcement agencies, when required by law.
- **Professional Advisors:** Such as auditors, legal counsel, or consultants, who provide advice or services necessary for business continuity or compliance.
- **Business Partners:** Collaborators or third parties directly involved in delivering, developing, or supporting our services and products.

When sharing personal data externally, XTX takes all reasonable precautions to ensure:

- **Compliance with Laws:** All external transfers are carried out in accordance with applicable data protection laws.
- **Stringent Controls:** Personal data is only shared on a need-to-know basis, and external parties must adhere to strict privacy and security requirements.
- **Appropriate Constraints:** Where external parties act as processors, XTX imposes ensures compliance with applicable data protection laws to ensure that personal data is handled securely, confidentially, and solely for the intended purposes.

3.3 International Data Transfers

If XTX needs to transfer personal data to a country outside the UK or EEA that does not provide the same level of data protection as required under GDPR (a "**Restricted Transfer**"), XTX will endeavour to put in place appropriate safeguards to protect your personal data which may include using Standard Contractual Clauses ("**SCCs**") or one of the other safeguards approved under Article 46 GDPR and where required to do so, XTX will conduct Third Country Risk Assessments to evaluate the risks associated with such Restricted transfer.

If safeguards cannot be implemented, and no exceptions under Article 49 GDPR apply (e.g., explicit consent or contractual necessity), XTX will not proceed with the Restricted Transfer. If XTX relies on explicit consent to perform a Restricted Transfer, this will be documented by way of a separate consent form which outlines amongst other things, the proposed transferee, the geographical location of the transferee, the personal data proposed to be transferred and the reason for the transfer.

Where the PDPA applies, XTX will not transfer your personal data to a country or territory outside Singapore unless XTX has taken appropriate steps to ensure that the recipient of your personal data is bound by legally enforceable obligations to provide a standard of protection that is at least comparable to the protection under the PDPA. This may include entering into binding contractual arrangements (including the use of SCCs) with the overseas recipient or relying on any other mechanism permitted under the PDPA and applicable regulations.

4 Retention of Personal Data And Your Rights as A Data Subject

4.1 Retention Of Personal Data

XTX will retain your personal data only for as long as necessary to fulfil the purposes for which it was collected, including to comply with legal, regulatory, contractual, and business obligations. The exact retention period for personal data will vary depending on the type of data, the purpose of processing, and applicable legal or regulatory retention requirements.

Once the applicable retention period has expired, we will securely delete, destroy, or anonymize your personal data in accordance with applicable data protection laws, unless further retention is required by law, or it is necessary for ongoing business purposes, regulatory audits, or to support legal claims.

For more detailed information about specific retention periods, please contact the Data Protection Office at dataprotection@txmarkets.com.

4.2 Your Rights as A Data Subject

In accordance with GDPR, you have a number of rights with respect to your personal data, namely:

- **A right of access** - You have the right to ask XTX for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for.
- **A right to rectification** - You have the right to ask XTX to correct or delete personal information you think is inaccurate or incomplete.
- **A right to erasure** - You have the right to ask XTX to delete your personal information.
- **A right to restriction of processing** - In certain circumstances, you have the right to object to XTX's processing of your personal data if there is no reason for XTX to keep it, although please note that there may be legal, regulatory or other reasons why XTX would need to keep using your personal data, and XTX would inform you of those reasons if applicable.
- **A right to object to processing** - You have the right to object to the processing of your personal data.
- **A right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you.
- **A right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time.

When the PDPA applies, you have the rights to access and correct your personal data held by XTX, and you may withdraw your consent at any time by giving XTX reasonable notice. Please note that the withdrawal of consent may affect XTX's ability to process your application or provide certain services to you.

If you (i) wish to exercise any of the rights described above, please send a request by email to the data protection office at dataprotection@txmarkets.com, who will assist with the matter.

4.3 Complaints and Further Information

If you have any concerns about XTX's use of your personal data, you can make a complaint to XTX at dataprotection@txmarkets.com.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to (i) the UK Information Commissioners Office for complaints under UK GDPR; (ii) the Commission nationale de l'informatique et des libertés for complaints under EU GDPR; or (iii) the Personal Data Protection Commission of Singapore for complaints under the PDPA.