

Privacy
Policy

隱私政策

December
2013

2013 年 12
月



LMAX Order Privacy Policy

Effective date: 2 December 2013

1. Introduction

LMAX Limited trading as LMAX (“we”, “us”, “our”, “ours” and “ourselves” as appropriate) respect your right to privacy are committed to protecting this. In this policy, ‘personal data’ shall have the same meaning as ‘personal information’ unless the context requires a different meaning to be given to the latter term.

This policy (together with our Agreement available from our website, www.LMAX.com (our “**Website**”) and any other documents referred to on it and our [Cookie Policy](#)) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to ensure you understand our views and practices regarding your personal data and how we will treat it. By visiting our Website you are accepting and consenting to the practices described in this Privacy Policy.

For the purpose of the Data Protection Act 1998 (the “**Act**”), the registered data controller is LMAX Ltd of Yellow Building, 1A Nicholas Road, London W11 4AN, with registration number 06505809.

2. Information we may collect from you

We may collect and process the following data about you:

- Information that you provide by filling in forms on our Website. This includes information provided at the time of registering to use our Website, subscribing to our service, posting material or requesting further services (including, but not limited to, your application, LMAX account number, name, email address, home address, telephone number, trading activity and history, commission charged (including the portion shared with any third party who introduces you to us (“**Introducer**”) or is engaged in the activities described in 4(iii), (iv), (v), (vi), (vii) and/or (viii)), open and closed trading positions, your account balance and other financial

LMAX 订单隐私政策

生效日期: 2013年12月2日

1. 简介

LMAX Limited (商标为 LMAX) (以下适当时候称为“本公司”、“我们的”和“我们”) 尊重并致力于保护您的隐私权。本政策中提到的“个人数据”与“个人信息”具有相同含义, 除非上下文对后者的含义另有要求。

本政策(与本公司网站 www.LMAX.com (简称“网站”) 上可获取的本公司协议, 以及网站上所提到的其他有关文件和本公司的 [Cookie 政策一起](#)) 构成我们向您收集个人数据, 或您提供以供本公司处理的个人数据的基础。请仔细阅读下文, 以确保您了解本公司对您个人数据的主张和做法以及如何对待您的个人数据。您访问本公司网站, 即接受和同意本隐私政策所述的做法。

根据 1998 年《数据保护法案》(简称“**法案**”), LMAX Ltd 注册为英国的数据控制方, 公司地址为 Yellow Building, 1A Nicholas Road, London, W11 4AN, 注册编号 06505809。

2. 本公司可能向您收集的信息

本公司有可能收集并处理与您相关的下列数据:

- 您填写本公司网站上的表格而提供的信息, 包括注册使用本公司网站、订购本公司服务、发布文章或请求进一步服务时所提供的信息(包括但不限于您的申请、LMAX 账号、姓名、电邮地址、家庭住址、电话号码、交易活动及历史、手续费(包括将您介绍给本公司的任何第三方(简称“介绍人”)或参与 4(iii)、(iv)、(v)、(vi)、(vii)及/或(viii)所提及活动之第三方与您共同分享的部分), 开仓及平仓、您的账户结余及其他财务信息, 您的账户使用情况以及您使用本公司服务、网站及设施的情况)。即使您放弃完成在线申请

information, use of your account and your use of our service, Website and facilities). We may automatically capture, store and otherwise process information about you even if you abandon the completion of an online application or registration form, however, in such circumstances, you will have the right not to allow us to capture, store and process your personal data.

- We may also ask you for information when you enter a competition or promotion sponsored by our external agents.
- When you report a problem with our Website.
- If you contact us (whether electronically or by post), we may keep a record of that correspondence.
- If you contact us by telephone, we may monitor and/or record your conversations with us and retain the recordings for such periods as may be necessary or required by law.
- We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.
- Details of transactions you carry out through our Website and of your orders and the fulfilment of such orders.
- With regard to each of your visits to our Website we may automatically collect the following information:
 - technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, location data, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, server logs and other communication data;
 - information about your visit, including, but not limited to, all Uniform Resource Locators (URL) clickstream analysis information (which includes collecting, analysing and reporting aggregate data about which pages you visit

或注册表格，本公司依然可以自动收集、储存以及处理您的信息，不过在这种情况下，您有权不允许本公司收集、储存及处理您的个人数据。

- 当您参加由本公司外部代理所主办的竞赛或推广活动时，本公司也可能向您索取资料。
- 当您报告本公司网站存在的问题时。
- 若您联系本公司（以电子或信件方式皆可），本公司将保存通信记录。
- 若您致电联系本公司，我们会监控和/或记录与您的对话，并根据需要或依法在此期间内保留这些记录。
- 本公司还会邀请您完成以研究为目的的调查，然而不强制要求您必须予以回复。
- 您通过本公司网站进行交易的详情、订单详情以及订单执行情况。
- 您每次访问本公司网站时，我们会自动收集下列资料：
 - 技术信息，包括用于将计算机连接到互联网的互联网协议（IP）地址、地理位置信息、您的登录信息、浏览器类型和版本、时区设置、浏览器插件类型和版本、操作系统和平台、服务器日志以及其他通信数据；
 - 访问信息，包括但不限于所有的统一资源定位符（URL）点击流分析信息（收集、分析和报告汇总数据，包括您浏览的网页及网页顺序、您访问本公司网站所使用的

and in what order, which site you have visited our Website from and which site you go to after leaving our Website (including applicable dates and times)); traffic data; products you viewed or searched for; page response times; download errors; length of visits to certain pages; page interaction information (such as scrolling, clicks, and mouse-overs); and methods used to browse away from the page; and

- any phone number used to call our customer service number.

▶ When working closely with third parties (including, but not limited to, business partners, Introducers, agents and sub-contractors in technical, administration, support, payment and delivery services, advertising networks, analytics providers and search information providers) we may exchange information about you with them.

▶ We may obtain information about you from third parties for the purposes of our compliance with anti-money laundering, anti-fraud and customer due diligence checks, such as credit reference agencies and fraud prevention agencies.

3. Cookies

Our Website uses cookies to enable you to use the Website, the online services we offer and the materials on the Website. Cookies are also used to distinguish you from other users of our Website. This helps us to provide you with a good experience when you browse our Website and also allows us to improve our Website. For detailed information on the cookies we use and the purposes for which we use them see our [Cookie Policy](#).

4. Where we store your personal data

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us, one of our suppliers, Introducers, business partners, agents or sub-contractors. Such staff maybe engaged in, among

链接、离开本公司网站后访问的网站（包括适用日期和时间）；网站流量数据；您浏览或搜索的产品；网页响应次数；下载错误信息；访问某些网页的时长；网页交互信息（例如滚动、点击、鼠标悬停）；以及浏览后退出页面的方法；和

- 呼叫本公司客户服务热线的所有电话号码。

▶ 和第三方紧密合作时（包括但不限于技术、行政、支持、支付和交付服务、广告网络、分析提供商和调查信息提供商方面的业务伙伴、介绍人、代理和分包商），本公司会与其互通关于您的信息。

▶ 出于反洗钱、反诈骗和客户尽职调查的目的，本公司会从信用调查机构、欺诈防范机构等第三方处获取您的资料。

3. Cookies

本公司网站使用的 cookies 使您能够使用本网站、本公司提供的在线服务以及网站上的资料。Cookies 也可用于辨别您和其他网站用户的身份。这有助于在您浏览本网站时，为您提供良好的用户体验，同时还能帮助本公司改进网站。请参考本公司的 [Cookie 政策](#)，了解本公司所使用 cookies 的详情及其用途。

4.您个人数据的存储位置

本公司向您收集的数据可能会被转移到并储存在欧洲经济区（“EEA”）之外，也可能由本公司或本公司的供应商、介绍人、业务伙伴、代理或分包商在欧洲经济区以外地区的员工进行处理。这些员工可能会参与(i)履行您的订单；(ii)处理您的付款明细；(iii)为您在本公司开

other things; (i) the fulfilment of your order; (ii) the processing of your payment details; (iii) the provision of administration and support services in respect of your customer account with us; (iv) communicating with you about your account and your account functionality and tools; (v) marketing and/or promoting services to you; (vi) other administration and support services; (vii) marketing; and/or (viii) other services. By submitting your personal data, you agree to this transfer, storing and processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy. All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted. Where you have chosen (or where we have given you) a password which enables you to access certain parts of our Website, you are responsible for keeping this password confidential. You should change your password on a regular basis and not share it with anyone. This will help to reduce the risk of unauthorised access to or use of your account. We strongly recommend that you disable any automatic password memory in your browser prior to using the Website and that you run appropriate anti-spyware, firewall and virus protection on your computer on a regular basis. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Website; any transmission is at your own risk. Once we have received your information, we will use appropriate technical and organisational measures to try to prevent unauthorised access or other unlawful processing of your information and against accidental loss or destruction of, or damage to, your information.

5. Uses made of the information

We use information held about you in the following ways:

- To ensure that content from our Website is presented in the most effective manner for you and for your computer.
- To provide you with information, products or services that you request from us or which we feel may interest you.

设的客户账户提供行政管理及支持服务；(iv)就您的账户、账户功能及工具问题与您沟通；(v)以您为对象的促销及/或推广服务；(vi)其他行政管理及支持服务；(vii)营销活动；及/或(viii)其他服务。提交您的个人数据，即表明您同意这种传输、存储及处理方式。我们将采取一切合理的必要措施确保您的数据根据本隐私政策的规定得到安全处理。您向本公司提供的所有信息都储存在我们的安全服务器上。所有付款交易都将进行加密。如果您已经选择了（或者我们已向您提供了）一个密码以访问我们网站的特定内容，则您有责任对此密码进行保密。您可定期修改您的密码，请勿向任何人透露密码，这有助于降低未经授权访问或使用您账户的风险。我们强烈建议您在使用此网站前取消个人浏览器中所有自动储存的密码，并定期在您的电脑上运行适当的反木马软件、防火墙及杀毒软件。遗憾的是，通过互联网传输信息无法做到万无一失。虽然本公司会尽最大努力保护您的个人数据，但是无法确保传输到本公司网站的数据安全无虞；任何传输风险须由您自行承担。收到您的资料后，本公司会采用适当的技术及机构措施全力阻止未经授权访问或非法处理您资料的行为，防范您的资料遭受意外丢失、毁坏或损坏。

5.信息用途

本公司通过以下方式使用所掌握的与您相关的信息：

- 确保以最有效的方式为您和您的电脑呈现本公司网站的内容。
- 向您提供您所需要的或者本公司认为您可能会感兴趣的信息、产品或服务。

- ▶ To provide you with information, products or services of third parties that where you have consented to be contacted for such purposes. ▶ 向您提供第三方信息、产品或服务，前提是您已同意本公司可基于上述目的与您联系。
- ▶ To carry out our obligations arising from any agreement entered into between you and us. ▶ 根据您与本公司签订的协议履行职责。
- ▶ To allow you to participate in interactive features of our service, when you choose to do so. ▶ 允许您参与本公司服务的互动环节，而且您是自愿参加的。
- ▶ To notify you about changes to our service. ▶ 通知您本公司对服务所作的变更。

We may also use your data, or permit selected third parties to use your data, to provide you with information about goods and services which may be of interest to you and we or they may contact you about these goods and services by e-mail, post, SMS message or telephone.

本公司也可以通过使用您的数据或允许选定的第三方使用您的数据，向您提供您可能感兴趣的商品和服务的有关信息，并且本公司或相关第三方可以通过电子邮件、邮寄、SMS 信息或电话就此与您联系。

If you are a customer, we will only contact you by electronic means (e-mail, SMS, post and/or telephone) with information about goods and services similar to those which were the subject of a previous sale to you.

如果您是客户，本公司将仅通过电子方式（电子邮件、SMS、发帖及/或电话）向您提供与先前向您出售的商品和服务内容类似的商品和服务的信息。

If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please tick the relevant box situated on the form on which we collect your data (the application form). Alternatively you can contact us by email, telephone or post to inform us that you no longer wish to receive marketing communications. If you unsubscribe to marketing communications, you will still continue to receive operational communications from us that we deem necessary for the operation of your account.

如果您不希望本公司以此方式使用您的数据，或为营销目的将您的详细信息披露给第三方，请在我们用来收集您的数据的表格（申请表）上的相应方框内打勾。您也可以通过邮件、电话或信件联系本公司，通知我们您不希望继续收到营销资讯。即使您退订了营销通讯，您依然会继续收到来自本公司的，我们认为运作您的账户所必要的运作通讯。

We do not disclose information about identifiable individuals to our advertisers or partners who provide content to our Website, but we may provide them with aggregate information about our users. We may also use such aggregate information to help advertisers reach the kind of audience they want to. We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience. For the avoidance of doubt, Introducers and other third parties which are listed in the ninth bullet point of Section 2 above shall not

本公司不会向为本公司网站提供内容的广告商或合作伙伴透露个人身份信息，但是本公司会向他们提供本公司用户的汇总信息。本公司也可以使用这些汇总信息帮助广告商锁定目标受众。本公司可利用向您收集的个人信息向该目标受众显示广告商的广告。为免生疑义，基于第 5 部分最后一段的内容，第 2 部分第 9 项中列明的介绍人及其他第三方不应被视为“为本公司网站提供内容的广告商或合作伙伴”。

be deemed to be ‘advertisers or partners who provide content to our Website’ for the purposes of the last paragraph of this Section 5.

6. Disclosure of your Information

We may disclose your personal information to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in the UK Companies Act 2006.

We may share your information with selected third parties including but not limited to:

- Suppliers, Introducers, business partners, agents and sub-contractors for the performance of any contract we enter into with them or you, including for (but not limited to) the following purposes: (i) assisting us to administer and support your customer account with us; (ii) assisting us to communicate with you about your account and your account functionality and tools; (iii) assisting us to market and/or promote services to you.
- Selected third parties to provide you with information, products or services that you request from us or which we or they feel may interest you, where you have consented to be contacted for such purposes.
- Advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. We do not disclose information about identifiable individuals to our advertisers, but we may provide them with aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, women in SW1). We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience.
- Analytics and search engine providers that assist us in the improvement and optimisation of our site.

6.披露您的信息

根据 2006 年《英国公司法》，本公司可以将您的个人信息披露给本集团的任何成员，即本公司的子公司、本公司的最终控股公司及其子公司。

本公司可以与选定的第三方共享您的信息，这些第三方包括但不限于：

- 供应商、介绍人、业务伙伴、代理及分包商，目的是为了履行本公司与他们或与您签订的任何合同，包括（但不限于）以下目的：(i) 协助本公司管理您在本公司开设的客户账户；(ii) 协助本公司与您就个人账户、账户功能及工具事宜进行沟通；(iii) 协助本公司为您提供促销及/或宣传服务。
- 选定的第三方，为您提供您向本公司请求或本公司认为您可能感兴趣的信息、产品或服务，前提是已同意本公司可基于上述目的与您联系。
- 需要使用此类数据为您及他人挑选并推送相关广告的广告商及广告网络。本公司不会向广告商透露个人身份信息，但是本公司会向他们提供本公司用户的汇总信息（例如，我们会告知他们，某一天有 500 名 30 岁以下的男士点击了他们的广告）。本公司也可以使用这些汇总信息帮助广告商锁定目标受众（例如邮编为 SW1 的女士）。本公司可利用向您收集的个人信息向该目标受众显示广告商的广告。
- 协助本公司改进并优化本公司网站的分析师及搜索引擎提供商。

- the Financial Conduct Authority and analogous and other applicable regulatory or governmental authorities upon their reasonable request; such third parties as we deem reasonably necessary in order to prevent crime; and other selected third parties where we are required to do so as a matter of applicable law.
 ➤ 提出合理要求的英国金融行为管理局及类似的、其他相关的监管机构或政府机关；我们认为合理必要的以预防犯罪为目的的第三方；以及依适用法律要求向其披露您的资料的其他选定的第三方。

- Credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you, and to fraud prevention agencies in order to conduct appropriate anti-fraud checks, each of which may keep a record of that information.
 ➤ 评估您信用分数的信用调查机构（您的信用分数是本公司与您签订合同的条件之一），以及进行反诈骗检查的诈骗防范机构，这两类机构会保留您的资料记录。

- We may disclose your personal information to third parties:
 ➤ 下列情况下本公司会向第三方披露您的个人信息：

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
 ➤ 本公司出售或购买任何业务或资产时，可能会向该业务或资产的潜在买家或卖家披露您的个人数据。

- If LMAX Ltd or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
 ➤ 若 LMAX Ltd 或其全部资产被第三方收购，则 LMAX Ltd 所掌握的客户个人数据也将成为被转让资产的一部分。

- If you are introduced to us by an Introducer, we may disclose your personal data to such Introducer.
 ➤ 介绍人将您介绍给本公司，则本公司可向该介绍人披露您的个人数据。

- If we instruct specialist advisers (such as research providers), if we instruct such specialist providers to provide us with specialist services.
 ➤ 如果本公司对专业顾问（例如调研机构）作出指示，当本公司指示专业服务提供商为本公司提供专业服务时。

- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Customer Agreement and other agreements; or to protect the rights, property, or safety of LMAX Ltd, members of our group, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud prevention and detection, and credit risk reduction, or with regulatory or governmental
 ➤ 如果我们为履行任何法律义务，或为执行或应用本公司的客户协议及其他协议，或为了保护 LMAX Ltd、本公司集团成员，本公司客户及他人的权利、财产或安全，本公司有义务披露或共享您的个人数据。这包括为了防止和侦查诈骗、降低信用风险而与其他公司和组织，或与监管机构、政府机关、法院或法庭交换信息。

authorities or a court of law or tribunal.

7. Your right to access to your Personal Data

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you.

8. Your other Rights

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us using the contact details provided below.

Our Website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

9. Changes to our Privacy Policy

Any changes we may make to our privacy policy in the future will be posted on our Website. This policy was last updated on 2 December 2013. Please check our Website frequently to see any updates or changes to our Privacy Policy.

10. Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to:

Email info@LMAX.com
Telephone + 44 203 192 2555

7.您获取个人数据的权利

法案赋予您获取本公司持有的与您相关的信息的权利。您可以根据法案行使信息获取权。任何获取信息的请求须缴纳 10 英镑费用，以承担我们向您提供本公司所持有的与您相关的资料的费用。

8.您的其他权利

您有权要求本公司不得将您的个人数据用于营销目的。若本公司就此目的而计划使用您的数据，或就此目的而计划将您的资料披露给任何第三方，本公司通常会（在收集您的资料前）予以通知。您可以行使自己的权利，通过在本公司用于收集您个人数据的表格上的相应方框内打勾，阻止该资料处理行为。您也可以随时按照下文提供的详细联系方式与我们联系，行使这一权利。

本公司网站会不时出现指向和来自本公司合作伙伴网络、广告商及附属机构的链接。如果您通过某个链接访问这类网站，请注意，这些网站有自己的隐私政策，且本公司不会为这些政策承担任何责任或义务。请在您向这些网站提交个人数据前，查阅这些政策。

9.隐私政策的变更

隐私政策未来的变更都将公布在本公司网站上。本隐私政策最近一次的更新时间是 2013 年 12 月 2 日。请时常浏览本公司网站，查看我们的隐私政策的更新或变更。

10.联系方式

欢迎您提出有关本隐私政策的问题、意见和要求，请发送电子邮件到：

电子邮件 info@LMAX.com
电话 + 44 203 192 2555

Address

LMAX Limited
Yellow Building
1A Nicholas Road
London
W11 4AN

地址

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Yellow Building
1A Nicholas Road
London
W11 4AN