Magna Options is a registered business name of Magna Trust securities and investment Services S.A. “Magna Trust” (43672/06/Β/99/35) an official member of the Athens Stock Exchange, authorised and regulated by the Hellenic Capital Market Commission (4/164/20.7.1999). Magna Trust is also compliant with the MiFID directive in Europe (3/481/30.7.2008) and the Foreign Account Tax Compliance Act (FATCA) in the United States (GIIN 063v14.99999.SL.300). Magna Trust operates under the LEI number 213800SISGTURPDOWL49 issued by the London Stock Exchange, as mandated by the European Securities and Markets Authority (ESMA).
DATA PROTECTION POLICY

Introduction
Magna Trust needs to collect and use certain types of information about the Data Subjects who come into contact with it in order to carry on our work. This personal information must be collected and dealt with appropriately – whether on paper, in a computer, or recorded on other material – and there are safeguards to ensure this under the Data Protection Act 1998.

The Firm is suitably registered at the Information Commissioner's Office (ICO) and is able to process data worldwide. This restriction must be borne in mind by the senior management. The following list below of definitions or the technical terms it have used is intended to aid understanding of this policy.

Data Controller – The person who (either alone or with others) decides what personal information Magna Trust will hold and how it will be held or used;

Data Protection Act 1998 – The UK legislation that provides a framework for responsible behaviour by those using personal information;

Data Protection Officer – The person(s) responsible for ensuring that Magna Trust adheres to its data protection policy and complies with the Data Protection Act 1998 is the compliance officer.

Data Subject/Service User – The individual whose personal information is being held or processed by Magna Trust (for example: a client, an employee, a supporter);

‘Explicit’ consent – is a freely given, specific and informed agreement by a Data Subject (see definition) to the processing of personal information about her/him. Explicit consent is needed for processing sensitive data;

Notification – Notifying the Information Commissioner about the data processing activities of Magna Trust as certain activities may be exempt from notification; Information Commissioner – The UK Information Commissioner responsible for implementing and overseeing the Data Protection Act 1998;

Processing – means collecting, amending, handling, storing or disclosing personal information;

Personal Information – Information about living individuals that enables them to be identified – e.g. name and address. It does not apply to information about companies and agencies but applies to named person(s) or employee(s) within Magna Trust; and Sensitive Data – means data about:

• Racial or ethnic origin;
• Political options;
• Religious or similar beliefs;
• Trade union membership;
• Physical or mental health;
• Sexual life;
• Criminal record; and
• Criminal proceedings relating to a data subject's offences.

Data Controller
Magna Trust is the Data Controller under the Act, which means that it determines what purposes personal information held, will be used for. It is also responsible for notifying the Information Commissioner of the data it holds or is likely to hold, and the general purposes for which this data will be used.

• Compliance will provide an annual face-to-face training covering areas of the Bribery Act to ensure they understand the legislation, the firm’s internal procedure and their responsibilities.

Disclosure
Magna Trust may share data with other agencies such as the local authority, funding bodies and other voluntary agencies.

The Data Subject will be made aware in most circumstances how and with whom their information will be shared. There are circumstances where the law allows certain recipients to disclose data (including sensitive data) without the data subject’s consent. These are:

Magna Options • Data Protection Policy

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1. Carrying out a legal duty or as authorised by the Secretary of State;
2. Protecting vital interests of a Data Subject or other person;
3. The Data Subject has already made the information public;
4. Conducting any legal proceedings, obtaining legal advice or defending any legal rights;
5. Monitoring for equal opportunities purposes – i.e. race, disability or religion;
6. Providing a confidential service where the Data Subject’s consent cannot be obtained or where it is reasonable to proceed without consent: e.g. where we would wish to avoid forcing stressed or ill Data Subjects to provide consent signatures.

Magna Trust regards the lawful and correct treatment of personal information as very important to successful working, and to maintaining the confidence of those with whom we deal. Magna Trust intends to ensure that personal information is treated lawfully and correctly. To this end Magna Trust will adhere to the Principles of Data Protection, as detailed in the Data Protection Act 1998. Specifically, the Principles require that personal information:
1. Shall be processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met;
2. Shall be obtained only for one or more of the purposes specified in the Act, and shall not be processed in any manner incompatible with that purpose of those purposes;
3. Shall be adequate, relevant and not excessive in relation to those purpose(s);
4. Shall be kept for longer than is necessary;
5. Shall be processed in accordance with the rights of data subjects under the Act;
6. Shall be kept secure by the Data Controller who takes appropriate technical and other measures to prevent unauthorised or unlawful processing or accidental loss or destruction of, or damage to, personal information;
7. Shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal information.

Magna Trust will, through both appropriate management and strict application of criteria and controls:
- Observe fully conditions regarding the fair collection and use of information;
- Meet its legal obligations to specify the purposes for which information is used;
- Collect and process appropriate information, and only to the extent that it is needed to fulfill its operational needs or to comply with any legal requirements;
- Ensure the quality of information is used;
- Ensure that the rights of people about whom information is held, can be fully exercised under the Act, (These include:
  - The right to be informed that processing is being undertaken;
  - The right of access to one’s personal information;
  - The right to prevent processing in certain circumstances; and
  - The right to correct, rectify, block or erase information which is regarded as wrong information.)
- Take appropriate technical and organisational security measures to safeguard personal information;
- Ensure that personal information is not transferred abroad without suitable safeguards;
- Treat people justly and fairly whatever their age, religion, disability, gender, sexual orientation or ethnicity when dealing with requests for information; and
- Set out clear procedures for responding to requests for information.

Data Collection
Informed consent
Informed consent is when
- A Data Subject clearly understands why their information is needed, who it will be shared with, the possible consequences of them agreeing or refusing the proposed use of the data and
- Then gives their consent.
Magna Trust will ensure that data is collected within the boundaries defined in this policy. This applies to data that is collected in person, or by completing a form. When collecting data, Magna Trust will ensure that the Data Subject
- Clearly understands why the information is needed;
- Understands what it will be used for and what the consequences are should the Data Subject decide not to give consent to processing;
- As far as reasonably possible, grants explicit consent, either written or verbal for data to be processed;
- Is, as far as reasonably practicable, competent enough to give consent and has given so freely without any duress; and
- Has received sufficient information on why their data is needed and how it will be used.

Data Security
Information and records relating to service users will be stored securely and will only be accessible to authorised staff and volunteers. Personal information on data subjects/service users is not disclosed either orally or in writing or otherwise to any unauthorised third party. Information will be stored for only as long as it is needed or as required by statute and will be disposed of appropriately. It is Magna Trust’s responsibility to ensure all personal and company data is non-recoverable from any computer system previously used within the organisation which has been passed on/sold to a third party.

Data Subject access and accuracy
All individuals who are the subject of personal data held by Magna Trust are entitled to:
- Ask what information Magna Trust holds about them and why.
- Ask how to gain access to it.
- Be informed how to keep it up to date.
- Be informed what Magna Trust is doing to comply with its obligations under the 1998 Data Protection Act.

Magna Trust will also take reasonable steps to ensure that this information is kept up to date by asking data subjects whether there have been any changes. In addition, Magna Trust will ensure that:
1. It has a Data Protection Officer with specific responsibility for ensuring compliance with Data Protection;
2. Everyone processing personal information understands that they are contractually responsible for following good data protection practice;
3. Everyone processing personal information is appropriately trained to do so;
4. Everyone processing personal information is appropriately supervised;
5. Anybody wanting to make enquires about handling personal information knows what to do;
6. It deals promptly and courteously with any enquires about handling personal information;
7. It describes clearly how it handles personal information;
8. It will regularly review and audit the ways it hold, manage and use personal information;
9. It regularly assesses and evaluates its methods and performance in relation to handling personal information; and
10. All staff are aware that breach of the rules and procedures identify in this policy may lead to disciplinary action being taken against them.

This policy will be updated as necessary to reflect best practice in data management, security and control and to ensure compliance with any changes or amendments made to the Data Protection Act 1998.

In case of any queries or questions in relation to this policy please contact the Magna Trust Data Protection Officer.