

Laidlaw & Company  
521 5<sup>th</sup> Avenue, 12<sup>th</sup> Floor, New York, NY 10175, US  
DPO Alex Shtaynberger

# LIDLAW & COMPANY

## Overview of Processing Activities under Article 30(1) GDPR

Document Last Updated October 1, 2019

### Controller Details

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Name	Laidlaw & Company (UK) Ltd.
Contact Person	Alex Shtaynberger
Street	521 5 <sup>th</sup> Avenue, 12 <sup>th</sup> Floor
City	New York
State	New York
ZIP Code	10175
Country	United States of America
Telephone	212-697-5200
E-Mail Address	gdprrequest@laidlawltd.com
Internet URL	<a href="https://laidlawltd.com/">https://laidlawltd.com/</a>

### Data Protection Officer (DPO) Details

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Name	Alex Shtaynberger
Street	521 5 <sup>th</sup> Avenue, 12 <sup>th</sup> Floor
City	New York
State	New York
ZIP Code	10175
Country	US
Telephone	212-697-5200
E-mail Address	gdprrequest@laidlawltd.com

### Processing Activity: Customer Identification Program

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Last Changed Date	October 1, 2019
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Description and Purpose of Processing Activities	Data processing for the purpose of identifying customers pursuant to the USA PATRIOT ACT
Legal Basis of the Processing Activity	Legitimate Interest
Data Subject Categories in the Processing Activity	Customers
Data Categories of the Processing Activity	Name Date of Birth Age Social Security Number/Tax ID Gender/Sex Physical/Mailing Address Cell Phone Number Home Phone Number Work Phone Number Email Address Government ID Number Hair Color Height Weight Race/National Origin Residency Status Country of Citizenship
External Processors	Schwab, INTL FCStone, Refinitiv, MIS, FWT, Morningstar
Transfers to Third Countries or International Organizations	Data are only processed within the United States and the United Kingdom

### **Processing Activity: Suitability**

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Last Changed Date	October 1, 2019
Description and Purpose of Processing Activities	Data processing for the determining suitability pursuant to FINRA Rule 2111
Legal Basis of the Processing Activity	Legitimate Interest
Data Subject Categories in the Processing Activity	Customers

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Data Categories of the Processing Activity	Net Worth Financial Holdings/Positions Trading Transactions Income Investment Objectives Years of Investment Experience Risk Tolerance Occupation Employer Marital Status
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External Processors	
Transfers to Third Countries or International Organizations	Data are only processed within the United States and the United Kingdom

### **Processing Activity: Website Security**

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Last Changed Date	October 1, 2019
Description and Purpose of Processing Activities	Data processing for the security of the website
Legal Basis of the Processing Activity	Legitimate Interest
Data Subject Categories in the Processing Activity	Customers
Data Categories of the Processing Activity	IP address Browser Cookies
External Processors	
Transfers to Third Countries or International Organizations	Data are only processed within the United States and the United Kingdom

### **Processing Activity: Client Record Retention**

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Last Changed Date	October 1, 2019
Description and Purpose of Processing Activities	Data processing for retaining of client records pursuant to the Securities Exchange Act of 1934
Legal Basis of the Processing Activity	Legitimate Interest
Data Subject Categories in the	Customers

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Processing Activity

Data Categories of the Processing Activity

External Processors

Transfers to Third Countries or  
International Organizations

Statements

Trade Confirms

Complaints

Schwab, INTL FCStone, Refinitiv

Data are only processed within the

United States and the United Kingdom