



October 2026

Privacy Policy - GDPR

This Policy sets out what information VCP collects and how we do so, store and use your personal data when visiting our website, instructing our brokerage services or sending us communications. In its effort to respect your right to privacy VCP is committed to limit its information collection to the very minimum necessary for offering its brokerage services.

Venture Commodities Partners LLP ("VCP") is the controller of the personal data described in this Policy.

What and how information is collected:

Information collected through our website:

Our website does not ask you to enter any personal data. To understand how the website is used, VCP uses the following analytics tools:

- Plausible Analytics, which counts visits without cookies and without identifying you. It does not store IP addresses: an anonymous identifier is derived from them for one day only, and the key used to create it is deleted every 24 hours. Plausible is hosted for VCP in the UK by its web provider,
- Google Analytics and Microsoft Clarity, only if you agree to them through the cookie bar on our website. They use cookies and collect information about your visit, such as the pages you view, clicks and scrolling, your device and browser type and your approximate location. Google Analytics does not log or store the IP addresses of visitors from the UK and the EU. Microsoft Clarity masks anything typed into forms. If you choose "Only essentials", neither tool is used.

The cookies used and how to change your choice at any time are described in the Cookie Policy on our website.

Information collected when liaising with VCP:

- Data collected during the on-boarding process and its ongoing maintenance (for regulatory KYC and AML purposes), such as business name and address, emails and phone numbers of contacts, company formation documents, UBO declaration and related ID verification documents,
- Data in relation to brokerage services (requests and transactions details, business agreement),
- Data pertaining to payments (bank details for service providers, billing preferences for customers),
- Any communication you would send to VCP (emails, phone calls, postal mail).

Information from third party:

Occasionally VCP may collect information from third party provider – usually for ID verification purpose. Such information will be combined with existing information already gathered about you and equally treated as Personal Data.

Legal basis:

VCP processes personal data to comply with its legal and regulatory obligations (including KYC, AML and record keeping), to perform its agreements with clients and service providers, and for its legitimate interest in running and improving its business. Google Analytics and Microsoft Clarity are only used with your consent, which you can withdraw at any time.



Data Storage:

Data collected is stored as per VCP's Information Systems Security Policy (ISSP) and is kept for a minimum of 7 years after the end of the business relationship.

Website analytics data is kept for shorter periods: Google Analytics data for 14 months, Microsoft Clarity session recordings for 30 days and other Clarity data for 9 months. Plausible keeps only visit statistics that do not identify you.

Data Usage:

VCP does not send any marketing material on its behalf nor advertises third parties' offerings. VCP does not use advertising cookies.

VCP essentially collects and process data in the course of its brokerage services delivery, including analysis of its operations to improve its business model.

VCP may share the information it collects in the following cases:

- If requested by law or to cooperate with law enforcement,
- With our professional advisers such as accountants and lawyers,
- With a prospective purchaser of the business (as a whole or in part),
- To protect VCP's interests against fraudulent activity,
- With service providers acting on VCP's behalf, including Google and Microsoft for website analytics where you have agreed to it.

Transfers outside the UK:

Google and Microsoft may process website analytics data outside the UK, including in the United States. These transfers are protected by the UK Extension to the EU-US Data Privacy Framework or by standard contractual clauses.

Your rights:

You have the right:

- To request a copy of the data we hold about you unless we legally are prevented from disclosing such information,
- To get data corrected if inaccurate or simply deleted so long it is not a legal requirement for us to hold it,
- To object to or ask us to restrict how we use your data, and to receive data you gave us in a portable format,
- To withdraw your consent to website analytics cookies at any time, using "Cookie settings" at the bottom of every page of our website.

To exercise any of these rights, please contact info@venturecommodities.com. You also have the right to complain to the Information Commissioner's Office (ico.org.uk).

Policy updates:

VCP reviews all its policies every year. We may also proceed to minor changes from time to time to keep them up to date. Please contact us for the latest version to consider. Should we feel that an update is of material significance we would contact you.