1   Background

Dowgate (a trading name of King & Shaxson Limited) operates a multilateral trading facility ("MTF") for the trading of non-equity instruments. As a trading venue, Dowgate is required to collect and store data from its Participants, including personal data, in order to fulfil its record keeping and (where applicable) transaction reporting requirements.

The purpose of this document is to set out how Participants may supply the relevant information and the security protocols put in place by Dowgate to ensure the security of any personal information uploaded to us.

2   Approach to PI information

In line with much of the industry, Dowgate supports the provision of short codes alongside personal information. These short codes can map to your internal systems and will be used in any reporting that you receive from us in relation to a user's trading activity. Personal information will only be extracted by us and used where we are required to forward information to the Financial Conduct Authority ("FCA") or to fulfil any other regulatory obligations.

3   Security & Submission of PI information

The Dowgate MTF is available online by invitation only following completion of the onboarding process. As part of this process, you will have been required to complete an authorisation form and to supply the IP address by which you will be connecting to the MTF. This IP address will be whitelisted on our firewall to allow you to connect to our MTF.

Only whitelisted IP addresses are able to access the MTF portal, which is not a public website. This has been done for security purposes to try and minimise any risks to our Participants. The portal is hosted at www.dowgate.com.

We have integrated the ability to upload short codes and long codes via the Dowgate website after user has logged in. Users can either submit their own information or, in case of central processing department, an authorised login can submit a bulk upload CSV file to us. The information uploaded is received directly into an encrypted database to ensure security.

The CSV template file includes the following fields that must be completed:

Dowgate Username	This is the corporate email address used by your traders to login to the Dowgate MTF
Short Code	Your internal reference code
Long Code	The national identifier of the individual (i.e. National insurance number, passport number or CONCAT code.
Identifier type	The type of identifier supplied (NI, Passport or CONCAT)
Effective Date	The effective date of the identifier
End Date	The end date of the identifier (if applicable – otherwise leave blank)

The template CSV submission file is available upon request to compliance@kasl.co.uk.

If you require an authorised login for the purposes of submitting a bulk upload of PI data, please complete the form on the following page and send it to compliance@kasl.co.uk

Authorised Bulk Upload User Activation

Participant Name (the "Participant"):			
Name	**Email address**	**Telephone number**	**IP address (if different to that already supplied)**

The below named individuals are hereby authorised to submit and manage personal information on our behalf.

SIGNED:

For and on behalf of the Participant:

_____

Name: _____

Date: _____

Position: _____