

# PRIVACY POLICY

**‘Traders Trust’ is committed to complying with applicable laws wherever we do business. This is not only vital to our continued success in an increasingly regulated global marketplace, but also reflects our commitment to conduct business in accordance with the highest legal and ethical standards.**

**As a Cyprus based company with operations worldwide, including within the European Union, ‘Traders Trust’ is subject to regulations under the laws of the Member States of the European Union and other countries, covering the personal information we process concerning our employees, customers, suppliers and others during our business activities.**

**This Privacy Policy, prepared by the Legal Department and our Office of Data Protection, is intended to help you understand these regulations. Our Data Protection Officers and their staff are available to answer any questions you may have. Although the specific technical requirements of the law are beyond the scope of this policy, these requirements establish uniform standards of conduct for employees of ‘Traders Trust’ and its subsidiaries worldwide who handle information covered by these regulations.**

**Full compliance is a requirement at ‘Traders Trust’ to help ensure adherence to applicable data privacy and security laws.**

**Thank you for your attention to this important matter.**

Original Issue Date:	September 2012
Approver(s):	Board of Directors
Owner(s):	TTCM TRADERS TRUST CAPITAL MARKETS LIMITED
Contact Person:	Chief Executive Officer
Classification:	Privacy Policy
Operational Applicability:	All personnel & Clients
Geographic applicability:	Worldwide
Last Revision Date:	April 2017
Last Reviewed Date:	April 2017
Next Review Date:	October 2017
Version:	8
Other Languages:	N/A

**‘TTCM Traders Trust Capital Markets Limited’** is a Cyprus Investment Firm incorporated under the laws of Cyprus, which has its principal place of business at 56 Theodorou Potamianou, 4th Floor, Complex Aphrodite, 4155 K. Polemidia, Limassol, Cyprus, and registered with the Registrar of Companies in Nicosia under number: HE 250591. ‘TTCM Traders Trust Capital Markets Limited’ is regulated as a Cyprus Investment Firm (*‘CIF’*) by the Cyprus Securities and Exchange Commission (*‘CySEC’*) under license number 107/09. ‘TTCM Traders Trust Capital Markets Limited’ operates in accordance with the Markets in Financial Instruments Directive (*‘MiFID’*) of the European Union.

## TABLE OF CONTENTS

<b>SUBJECT</b>	<b>PAGE</b>
1. INTRODUCTION .....	3
2. RIGHT TO PRIVACY .....	3
3. INFORMATION WE COLLECT .....	4
4. PERSONAL INFORMATION .....	4
5. ABOUT COOKIES.....	5
6. SECURITY TECHNOLOGY.....	5
7. SHARING INFORMATION WITH OUR AFFILIATES.....	6
8. SHARING INFORMATION WITH THIRD PARTIES .....	6
9. REGULATORY DISCLOSURE .....	7
10. SOCIAL TRADING PLATFORMS.....	7
11. CREDIT INFORMATION.....	8
12. RECORDING OF TELEPHONE CONVERSATIONS, E-MAILS, INTERNET CONVERSATIONS (CHAT), MEETINGS AND OTHER COMMUNICATIONS .....	8
13. OPT OUT .....	8
14. MONITORING AND REVIEW.....	9
15. CLIENT CONSENT .....	9
16. MISCELLANEOUS .....	9

'TTCM Traders Trust Capital Markets Limited' is a Cyprus Investment Firm incorporated under the laws of Cyprus, which has its principal place of business at 56 Theodorou Potamianou, 4th Floor, Complex Aphrodite, 4155 K. Polemidia, Limassol, Cyprus, and registered with the Registrar of Companies in Nicosia under number: HE 250591. 'TTCM Traders Trust Capital Markets Limited' is regulated as a Cyprus Investment Firm ('CIF') by the Cyprus Securities and Exchange Commission ('CySEC') under license number 107/09. 'TTCM Traders Trust Capital Markets Limited' operates in accordance with the Markets in Financial Instruments Directive ('MiFID') of the European Union.

# PRIVACY POLICY

## 1. INTRODUCTION

- 1.1. **'TTCM Traders Trust Capital Markets Limited'**, is a Cyprus Investment Firm incorporated under the laws of Cyprus, which has its principal place of business at 56 Theodorou Potamianou, 4<sup>th</sup> Floor, Complex Aphrodite, 4155 K. Polemidia, Limassol, Cyprus, and registered with the Registrar of Companies in Nicosia under number: HE 250591 (the "**Company**"). The Company is regulated as a Cyprus Investment Firm (**'CIF'**) by the Cyprus Securities and Exchange Commission (**'CySEC'**) under license number 107/09.
- 1.2. The Company is operating under *Directive 2004/39/EC of the European Parliament and of the Council of 21 April 2004 on markets in financial instruments amending Council Directives 85/611/EEC and 93/6/EEC and Directive 2000/12/EC of the European Parliament and of the Council and repealing Council Directive 93/22/EEC*, as the same may be in force from time to time and modified or amended from time to time (the "**Markets in Financial Instruments Directive (2004/39/EC)**" or "**MiFID**"), which was implemented in Cyprus by the *Investment Services and Activities and Regulated Markets Law of 2007 (Law 144(I)/2007 of 26 October 2007) and Cyprus Law 106(I)/2009 of 23 October 2009*, which provide for the provision of *Investment Services, the exercise of Investment Activities, the operation of Regulated Markets and other related matters* (the "**Investment Services and Activities and Regulated Markets Law**"), as the same may be modified and amended from time to time.
- 1.3. As such, the Company is required to comply with *Directive 95/46/EC of the European Parliament and of the Council of 24 October 1995 on the protection of individuals with regard to the processing of Personal Data and on the free movement of such data*, as implemented in Cyprus law by *Cyprus Law 138(I)2001 on the Processing of Personal Data (Protection of Individuals)*, which was amended by *Cyprus Law of 2003 (37(I)2003) on the Processing of Personal Data (Protection of Individuals)*, as the same may be in force from time to time and modified or amended from time to time (the "**Personal Data Protection Legislation**").

## 2. RIGHT TO PRIVACY

- 2.1. We respect each individual's right to privacy, we value our relationship with you, and we take pride in maintaining loyalty and respect with each individual client by providing you with privacy and security.
- 2.2. The provisions of this Policy apply to former clients, as well as our current clients, and contain the manner in which we collect and maintain non-public information about our clients (such as your full

---

name, mailing address, identification number, passports, driver's license etc..., henceforth "**Information**").

- 2.3. We use the Information we collect from you only as appropriate to provide you with quality service and security. For example, we may use the Information collected from you to verify your identity. We may also use this Information to establish and set up your trading Account, issue an Account number, issue Access Codes (username and/or password), log your activity and contact you from time to time. The Information you provide us helps us to improve our Services to you, customize your browsing experience and inform you about additional products, services or promotions that may be of interest to you. Should you ever deactivate your Account with us, we will keep your information on file, but only use it to comply with regulatory requirements and to contact you occasionally with the option to reactivate your account. Please note that you may opt out of our Information sharing policies at any time by notifying us of your desire to do so as explained below.

### 3. INFORMATION WE COLLECT

- 3.1. We collect Information from you when you:

- a. open an Account and provide us with Information through electronic registration forms;
- b. make a transaction with us, including when you deposit and withdraw funds;
- c. additionally, from time to time, we may collect Information about you from third party entities or agencies, such as information about your credit history.

- 3.2. By providing us with Information, you are giving us your consent to collect, use and store the Information in the manner explained hereinafter.

### 4. PERSONAL INFORMATION

- 4.1. When you apply for or maintain a live account with us, we collect personal information about you for business purposes, such as evaluating your financial needs, processing your requests and transactions, informing you about products and services that may be of interest to you, and providing customer service. Such information may include:

- a. **Application Information:** Information you provide to us on applications and other forms, such as your name, address, birth date, social security number, occupation, assets, and income, as well as Information required to communicate with you such as your address, phone number and/or e-mail;

- b. *Transaction Information:*** Information about your transactions with us and with our Affiliates as well as information about our communications with you (examples include your account balances, trading activity, your inquiries and/or our responses);
  - c. *Verification Information:*** Information necessary to verify your identity such as a passport or driver's license (examples also include background information we receive about you from public records or from other entities not affiliated with us); furthermore, we may collect other identifiable Information such as identification numbers and/or Passport/Tax registration numbers; we may also collect demographic information when you open an account, including your gender, birth date, etc...; we may also need to evaluate your trading experience, average annual income, estimated net worth and make an assessment about your risk factor.
- 4.2. You directly provide us with most of the Information we collect. You do this by filling out the electronic form(s) (including, without limitation, the Account Opening Application Form(s)) that we post on our Online Trading Facility and by voluntarily providing us with other required documents.
- 4.3. Additionally, you provide us with Information by trading on our systems, by contacting us or by responding to a promotion; the information we indirectly collect may include logging your Internet Protocol (IP) address, software configuration, operating system and use of Cookies.

## 5. ABOUT COOKIES

- 5.1. Cookies are small files containing information that a Website uses to track its visitors, which may be sent from us to your computer and sometimes back. Cookies ultimately help us improve your navigation and ease of use of our Online Trading Facility. We may set and access Cookies on your computer, enabling us to learn which advertisements and promotions bring users to our Online Trading Facility.
- 5.2. Furthermore, we may use cookies in connection with our products and services to track your activities on our Website(s).
- 5.3. Cookies do not contain any personally identifiable information. Such information, which we may collect and share, is anonymous and not personally identifiable.

## 6. SECURITY TECHNOLOGY

- 6.1. We protect your Information by using data security technology and using tools such as firewalls and data encryption. We use 'Secure Socket Layer (SSL)' encryption technology in order to protect certain information that you submit to us. This type of technology protects you from having your information intercepted by anyone other than us, while it is being transmitted to us.

- 6.2. We work hard to ensure that our Websites are secure and that they meet industry standards. We also use other safeguards such as firewalls, authentication systems (e.g. passwords and personal identification numbers), and access control mechanisms to control unauthorized access to systems and data.
- 6.3. We also require that you use your personal Access Codes (personal username and password) every time you access your account online. We restrict access to Information at our offices so that only officers and/or employees who need to know the Information have access to it.

## **7. SHARING INFORMATION WITH OUR AFFILIATES**

- 7.1. We may share personal information described above with our affiliates for business purposes, such as, but not limited to, servicing customer accounts and informing customers about new products and services, or to aid in the trading activity of the company, its affiliates, or employees, and as permitted by applicable law.
- 7.2. Our affiliates may include companies controlled or owned by us as well as companies that have an ownership interest in our company. The information we share with affiliates may include any of the information described above, such as your name, address, trading and account information. Our affiliates maintain the privacy of your information to the same extent as we do, in accordance with this Policy.

## **8. SHARING INFORMATION WITH THIRD PARTIES**

- 8.1. We do not disclose your personal information to third parties, except as described in this Policy.
- 8.2. In those limited circumstances where we may disclose your personal information to third parties, such third party disclosures may include sharing such information with non-affiliated companies that perform support services for your account or facilitate your transactions with us, including those that provide professional, legal, or accounting advice to us.
- 8.3. Non-affiliated companies that assist us in providing services to you are required to maintain the confidentiality of such information to the extent they receive it and to use your personal information only in the course of providing such services and only for the purposes that we dictate.
- 8.4. We may also disclose your personal information to third parties to fulfil your instructions or pursuant to your expressed consent.
- 8.5. We want you to know that we will not sell your personal information.

## 9. REGULATORY DISCLOSURE

- 9.1. Under limited circumstances, we may disclose your personal information to third parties as permitted by, or to comply with, applicable laws and regulations. For example, we may disclose personal information to cooperate with regulatory authorities and law enforcement agencies to comply with subpoenas or other official requests, and as necessary to protect our rights or property.
- 9.2. Except as described in this privacy policy, we will not use your personal information for any other purpose, unless we describe how such information will be used at the time you disclose it to us or we obtain your permission.

## 10. SOCIAL TRADING PLATFORMS

- 10.1. We may provide you with the possibility to participate in a real-time social trading platform, which integrates rich community and social characteristics into our Online Trading Facility.
- 10.2. Clients who choose to be part of this community/network are required to agree to be part of the network and share their strategies and performance with other clients who choose to be part of the community/network. Accordingly, if you choose to be part of this community/network, you agree and acknowledge that your username, your picture/avatar (if provided), your state of residency, gender, networks, list of users who follow you, users who copy you etc..., list of users you follow or copy, and any network status/posts/blogs and any other content options that enable our clients to interact amongst themselves on such social trading platform, including, without limitation, all content and Information you may be posting thereon, as well as any comments, feedback, postings and/or all Information that you provide to us via our Online Trading Facility and/or via Electronic Messaging, e-mail, fax or telephone in relation thereto, shall be considered non-confidential and non-proprietary information (other than your Personal Data and Information, as described hereinabove, collectively, the “**Content**”).
- 10.3. All portfolio and trading information performance results shall be considered non-confidential and non-proprietary information and as our property. By providing such Content, you specifically grant us a non-exclusive, irrevocable, transferable, sub-licensable, royalty-free, worldwide license to use, copy, duplicate store, present and/or publish all or any part of your Content, and we shall be free to use such Content in any manner or media whatsoever, on an unrestricted basis and without any attribution or royalties or other compensation to you.
- 10.4. Any personal Information of clients who participate in this community/network and the amount(s) traded shall, however, never be disclosed. You can always opt-in and/or opt-out of this community/network, very simply, at your discretion.

## **11. CREDIT INFORMATION**

- 11.1. We do not share credit information, such as credit history, net worth, or other income information, except as otherwise provided herein.
- 11.2. In accordance with the recommendations of Payment Card Industry Security Standards Council, customer card details are protected using Transport Layer encryption — TLS 1.2 and application layer with algorithm AES and key length 256 bit.

## **12. RECORDING OF TELEPHONE CONVERSATIONS, E-MAILS, INTERNET CONVERSATIONS (CHAT), MEETINGS AND OTHER COMMUNICATIONS**

- 12.1. Your telephone conversations, e-mails, internet conversations (chat), meetings and other communications with us may be recorded/maintained by us.
- 12.2. Any such recordings shall be and shall remain our sole property and will be accepted by you as conclusive evidence of their content as recorded by us.
- 12.3. You agree that we may deliver copies of transcripts of such recordings to any court, regulatory or government authority, including without limitation, in disputes which may arise between you and us. However, technical reasons may prevent us from recording a conversation, and recordings or transcripts made by us will be destroyed in accordance with our normal practice. Consequently, you should not rely on such recordings to be available.

## **13. OPT OUT**

- 13.1. You are not required to supply any of the personal information that we may request; however, failure to do so may result in our being unable to open or maintain your account or to provide services to you.
- 13.2. While we make every effort to ensure that all information we hold about you is accurate, complete and up to date, you can help us considerably in this regard by promptly notifying us if there are any changes to your personal information.
- 13.3. If you do not wish to have your personal information disclosed to our affiliates or other third parties as described in this Policy, please contact us via e-mail at: [compliance@traders-trust.com](mailto:compliance@traders-trust.com) or by fax at the following fax number: +357 25 20 7007, or you may send your request via postal mail to:

**Traders Trust**  
Attention: Compliance Officer  
P.O. Box 70721  
3802 Limassol

---

**'TTCM Traders Trust Capital Markets Limited'** is a Cyprus Investment Firm incorporated under the laws of Cyprus, which has its principal place of business at 56 Theodorou Potamianou, 4th Floor, Complex Aphrodite, 4155 K. Polemidia, Limassol, Cyprus, and registered with the Registrar of Companies in Nicosia under number: HE 250591. 'TTCM Traders Trust Capital Markets Limited' is regulated as a Cyprus Investment Firm ('CIF') by the Cyprus Securities and Exchange Commission ('CySEC') under license number 107/09. 'TTCM Traders Trust Capital Markets Limited' operates in accordance with the Markets in Financial Instruments Directive ('MiFID') of the European Union.



---

Cyprus

13.4. Please include your name, Account number, mailing address, e-mail address and telephone number.

13.5. Please be advised, however, that if we receive such instruction we will not be able to service your account and must close any open and funded accounts you have.

## **14. MONITORING AND REVIEW**

14.1. We will monitor on a regular basis the effectiveness of this Policy and, in particular, the execution quality of the procedures explained in the Policy and, where appropriate, we reserve the right to correct any deficiencies.

14.2. We will inform our clients of any material change to this Policy by posting an updated version of this Policy on our Website(s).

## **15. CLIENT CONSENT**

15.1. By accessing and/or using our Website(s) and/or our services, you are consenting to the transmittal of your Personal Data (*i.e.* your personally identifiable Information and your payment details) to our subsidiaries and/or Affiliates and to external companies to help us to process and/or analyse it as part of the provision of our Services to you, whether within or outside the European Economic Area.

15.2. Such Personal Data may also be used for marketing purposes, or to conduct market research for us or other companies in our group that may use such Personal Data to bring to your attention products and/or services that may be of interest to you and also to assist in the efficient provision of our services, all in accordance with this Policy.

## **16. MISCELLANEOUS**

16.1. We reserve the right to review and/or amend this Policy and arrangements, at our sole discretion, whenever we deem fit or appropriate.

16.2. Our Privacy Policy is a policy only, it is not part of our Terms and Conditions of Business and is not intended to be contractually binding or impose or seek to impose any obligations on us which we would not otherwise have, but for the "*Personal Data Protection Legislation*".

16.3. Should you have a question about Privacy and/or Data protection at 'Traders Trust', please direct your questions to our Compliance Department: [compliance@traders-trust.com](mailto:compliance@traders-trust.com).