

## COOKIES POLICY AND DISCLOSURE

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| Original Issue Date:       | June 2017                     |
| Approver(s):               | Board of Directors            |
| Owner(s):                  | TTCM CAPITAL MARKETS LIMITED  |
| Contact Person:            | Chief Executive Officer       |
| Classification:            | Cookies Policy and Disclosure |
| Operational Applicability: | All personnel and clients     |
| Geographic applicability:  | Vanuatu                       |
| Last Revision Date:        | June 2017                     |
| Last Reviewed Date:        | June 2017                     |
| Next Review Date:          | June 2018                     |
| Version:                   | 1                             |
| Other Languages:           | N/A                           |

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# COOKIES POLICY AND DISCLOSURE

## 1. INTRODUCTION

- 1.1. **'TTCM Capital Markets Limited'**, (herein after "TTCM" or "the Company") is a limited liability Vanuatu Financial Services Company, incorporated under the International Companies Act of Vanuatu and registered with the Vanuatu Financial Services Commission ("VFSC") under Company number 40292. TTCM is regulated as under the Dealers in Securities (Licensing) Act as a Principal by the VFSC.
- 1.2. The Company is operating in accordance with the Dealers in Securities (Licensing) Act (CAP70) of Vanuatu (the "*Prevention of fraud (investments)*" , as has been amended on 16 June 2017 and/or from time to time and the Act on International Companies of Vanuatu (CAP222), which was implemented in Vanuatu by the *Vanuatu Financial Services Commission*.

## **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 Cookies Policy and Disclosure apply to all Websites operated by the Company, (including the client area and all other panels and dashboards available under any of the domains operated by the Company) and explains how Cookies are placed on your computer, tablet and/or mobile telephone (a "**device**") in order to log information.
- 2.3. By using the Company's Website(s) you agree that 'Cookies' will be placed on your computer or device in accordance with the terms of this Cookies Policy and Disclosure. The Company's Cookies Policy and Disclosure provides users of the Company's Website(s) with information on which Cookies are set when you visit the Company's Website(s) and how to reject or delete those Cookies.
- 2.4. Users of the Company's Website(s) should also be familiar with the Company's Privacy Policy, in which this Cookies Policy and Disclosure is incorporated by reference.
- 2.5. **PLEASE CAREFULLY READ THE COMPANY'S PRIVACY POLICY AND THIS COOKIES POLICY AND DISCLOSURE BEFORE USING ANY OF OUR WEBSITES.**

## **3. WHAT ARE COOKIES?**

- 3.1. Cookies are small text files of information that are stored in the Cookie file of the browser on your computer's hard disk when you first visit certain pages or perform certain actions on a website, or when you open certain e-mails. They can include any specific information you have entered into forms and the time and date of your visit. These Cookies cannot harm your computer or device, are anonymous and unique to the browser. Cookies are used to improve user experience, make the website work, enable Website security and provide the business with marketing information about the Website's visitors.
- 3.2. The Cookie text files comprise numbers and letters. The Cookie files are saved into special areas in the memory of your computer or mobile device. Cookies stored here are called 'session Cookies' with Cookies placed into the hard drive called 'persistent Cookies'.

## 4. WHAT ARE COOKIES GENERALLY USED FOR?

4.1. Websites mainly use Cookies to:

- identify users;
- remember users' custom preferences;
- help users complete tasks without having to re-enter information when browsing from one page to another or when visiting the Website(s) later.

4.2. Cookies can also be used for online behavioral target advertising and to show adverts relevant to something that the user searched for in the past.

## 5. WHAT ARE THE DIFFERENT TYPES OF COOKIES?

5.1. A Cookie can be classified by its lifespan and the domain to which it belongs. By lifespan, a Cookie is either:

- A **'session Cookie'**, which is erased when the user closes the browser; these are temporary Cookies stored in your computer's memory only during your browsing sessions. They are automatically deleted from your computer when the browser is closed and can also become no longer accessible after the session has not been active for a specified length of time; or
- A **'persistent Cookie'**, which remains on the user's computer/device for a pre-defined period of time; these are Cookies that are stored on your equipment between browsing sessions and are not deleted when the browser is closed. In contrast to session Cookies, permanent Cookies can retain your preferences for a specific website, allowing those preferences to be used in your future browsing sessions.

5.2. As for the domain to which a Cookie belongs, there are either:

- **'first-party Cookies'**, which are set by the web server of the visited page and share the same domain;
- **'third-party Cookies'** stored by a different domain to the visited page's domain; these are Cookies that belong to domains, different from the one shown in the address bar. The web pages on that domain may feature content from a third-party domain (banners, adverts). This can happen when the webpage references a file, such as JavaScript, located outside its domain. Third-party Cookies are often allowed by a Web browser; however, they can be blocked if you wish to do so.

5.3. **In addition to session Cookies, permanent, first-party and third-party Cookies, there may be other Cookies which are set by our Websites, in order to provide us or third-parties with important information. A description of such other Cookies is provided further in this Cookies Policy and Disclosure.**

## 6. LEGAL AND REGULATORY PROVISIONS REGARDING THE USE OF COOKIES

- 6.1. All of the Company's Websites must follow the guidelines on privacy and data protection set out in the Personal Data Protection Legislation, which requires prior informed consent for storage of/or access to information stored on the terminal equipment (computer, tablet and/or mobile telephone) of any user of the Company's Website(s) and imposes an obligation on the Company to ask users of its Website(s) if they agree to most Cookies and similar technologies (e.g. web beacons, Flash Cookies, etc.) before its Website(s) start(s) to use them and to inform them that Cookies are not being used to gather information unnecessarily.
- 6.2. For such consent of the users of the Company's Website(s) regarding the use of Cookies to be valid, it must be informed, specific, freely given and must constitute a real indication of the individual's wishes.
- 6.3. However, some Cookies are exempt from this requirement. Consent is not required if the Cookie is:
  - used for the sole purpose of carrying out the transmission of a communication; and
  - strictly necessary in order for the provider of an information society service explicitly required by the user to provide that service.
- 6.4. Cookies that are clearly exempt from consent according to the EU Advisory Body on Data Protection (Opinion 04/2012 on Cookie Consent Exemption, adopted on 7 June 2012) include the following:
  - **'user-input Cookies'** (session-id) such as first-party Cookies to keep track of the user's input when filling online forms, shopping carts, etc., for the duration of a session or persistent Cookies limited to a few hours in some cases;
  - **'authentication Cookies'**, to identify the user once he has logged in, for the duration of a session;
  - **'user-centric security Cookies'**, used to detect authentication abuses, for a limited persistent duration;
  - **'multimedia content player Cookies'**, used to store technical data to play back video or audio content, for the duration of a session;
  - **'load-balancing Cookies'**, for the duration of session;
  - **'user-interface customisation Cookies'** such as language or font preferences, for the duration of a session (or slightly longer);
  - **'third-party social plug-in content-sharing Cookies'**, for logged-in members of a social network.

## 7. USE OF COOKIES ON THE COMPANY'S WEBSITE(S)

- 7.1. The Company's Website(s) use(s) Cookies to provide the functionality you need to browse our Website(s) correctly. We use Cookies to enable you to improve your user experience when using our Website(s). The use of Cookies helps us maintain security and verify your details, which enables you to avoid re-entering your details each time you visit our Website(s). Cookies do not only help us recognise and remember you as a unique user when you return to our Website(s), but they also collect anonymous information for evaluation purposes to help us improve the structure of our website.
- 7.2. The Company's Website(s) issue Cookies upon landing on our Website(s), unless the user has changed Cookie settings in their browser to refuse Cookies. Please note that with Cookies switched off, some areas of our Website(s) and services may not be available to you and that you may not be able to login with Cookies disabled. The Company supports social bookmarking and with Cookies disabled this functionality may not be available.
- 7.3. Other than as expressly disclosed in this Cookies Policy and Disclosure, the Company does not use Cookies to collect personally identifiable information about you; other than as expressly disclosed in this Cookies Policy and Disclosure, the Cookies we use only collect anonymous information to optimise our services and do not collect personal information.
- 7.4. Please note, however, that not all the Cookies on our Website(s) are set by us. Please see the Section above on '*third party Cookies*'.

## 8. CATEGORIES OF COOKIES STORED ON YOUR DEVICE WHEN BROWSING THE COMPANY'S WEBSITES

- 8.1. The categories of Cookies stored on your device when browsing the Company's Website(s) include the following:
  - **Essential Cookies:** These Cookies are essential for the operation of our Website(s) (such as features and accessing secure areas of the Website(s)). Without these Cookies, certain options on our Website(s) may not be available. The essential Cookies are vital for us to use for the quality of our services to you.
  - **Performance Cookies:** We utilise Cookies to analyse how our visitors use our websites and also to monitor website performance. These Cookies do not collect any information that identifies our visitors, but it is collected anonymously.
  - **Functionality Cookies/ Traffic Log Cookies:** We use functionality/traffic log Cookies to identify which pages are being used and to allow us to remember your preferences and to provide enhanced or more personal features. These Cookies remember choices you make to improve your experience. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis

purposes and then the data is removed from the system. We use this information to understand, for example, the effectiveness of our advertising and marketing.

- **Behavioural advertising Cookies (third party):** We and third party advertisers use Cookies to serve you with advertisements that we believe are relevant to you and your interests. They also limit the number of times you see an advertisement and they help measure the effectiveness of an advertising campaign. These Cookies are used by targeted advertising services to collect information about your browser habits and to deliver advertisements more relevant to you. We may also use such Cookies to track campaigns from banner advertisements and opt-in emails. We may use third-party providers to help us determine which of our advertisements are most likely to be of interest to you. These providers may use behavioural information, such as how you navigate the internet, to provide relevant advertisements to you. We may also allow some of these companies to use tracking pixels. Tracking pixels may be used to collect and store information about visits to our Website(s), such as which pages you viewed and how long you spent on our Website(s), as well as the specific advertisement that you clicked to visit our Website(s). No personally identifiable information is stored on these Cookies or web pixels. The information reported to us is aggregated and anonymous. Where applicable, you can opt out of these behavioural advertising Cookies and continue your browsing on our Website(s).

## 9. GOOGLE ANALYTICS

- 9.1. We use Google Analytics that uses Cookies to count the numbers of visitors and their consumer behaviour. In this way, we can tailor the content of our website to correspond to your interests and preferences. The information generated by the Cookies is stored by Google and it is later used by it to evaluate the use of our website, and to conduct reports on the activity of the website or the internet.
- 9.2. To opt out of being tracked by Google Analytics please visit <http://tools.google.com/dlpage/gaoptout>.

## 10. USE OF FLASH FILES

- 10.1. We make use of flash files, which present information, allow integration with 3rd parties (such as YouTube) and can offer a richer online experience.
- 10.2. Currently technology is limited in its ability to review the '*inner workings*' of flash files. We have strived to identify any flash elements that are likely to set Cookies but, at this point in time, we cannot guarantee the status of every flash file.
- 10.3. Adobe offers a tool to monitor, opt out and remove 'flash Cookies' - for more information visit <http://www.adobe.com/>.

## 11. SOCIAL MEDIA

- 11.1. Social media can place Cookies through our Website(s) to integrate social media (i.e. LinkedIn, Twitter, Google+ and Facebook). You agree to place these Cookies on your device by clicking on the social media buttons to activate them.
- 11.2. These social media have their own privacy and Cookie policies, which the Company does not control.



11.3. Please check the social media websites for more information about their Cookies and how to manage them.

## **12. ADVERTISING**

12.1. The Company's Website(s) use(s) the advertising services of Google AdWords. Google AdWords can place Cookies on your device to serve ads based on your prior visits to the Company's Website(s).

12.2. More information on the use of Cookies by Google AdWords can be found on the Google websites.

12.3. You may refuse the use of Cookies by selecting the appropriate settings on your browser. Please note that if you do so, you may not be able to use the full functionality of the Company's Website(s) features.

### **13. EXAMPLES OF COOKIES USED BY THE COMPANY'S WEBSITES**

13.1. The details about the Cookies that are used on our Website(s) are set out in **Appendix A** hereto.

13.2. To ensure that you are fully informed of all the Cookies we are using on our Website(s), you can audit the Cookies used on our website(s) and automatically generate Cookie information by installing the Cookie audit tool provided by 'Attacat Resources' at the following URL: <http://www.attacat.co.uk/resources/Cookies>; It's free and no registration is required.

### **14. HOW TO CONTROL COOKIES**

14.1. Many browsers are set to accept Cookies; however, you can prevent new Cookies from being installed on your computer. If you wish to disable or block Cookies, you can do it through changing your internet software browsing settings, or you can either choose specific website that you will accept Cookies from. You can configure your browser setting to inform you each time a new Cookie is about to be stored on your computer, giving you the chance to decide if you want to accept or reject it.

14.2. All recent versions of popular browsers give users a level of control over Cookies. Users can set their browsers to accept or reject all, or certain, Cookies. Users can also set their browser to prompt them each time a Cookie is offered. For details, see: [www.aboutCookies.org](http://www.aboutCookies.org).

14.3. You can also control Adobe Local Shared Objects on your computer, also known as LSOs or Flash Cookies, but not with your browser. Instead, Adobe's website offers tools to control Flash Cookies on your computer. For details, see: [http://www.macromedia.com/support/documentation/en/flashplayer/help/settings\\_manager07.html](http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager07.html)

14.4. Users of the Firefox browser can also get an add-on to detect and delete Flash Cookies. For details, see: <https://addons.mozilla.org/en-US/firefox/addon/betterprivacy/>

### **15. HOW TO DELETE COOKIES**

15.1. You can control and/or delete Cookies as you wish. You can delete all Cookies that are already on your computer and you can set most browsers to prevent them from being placed. If you do this, however, you may have to manually adjust some preferences every time you visit our Website(s) and some services and functionalities may not work.

- 15.2. Most Cookies are easy to delete. Just pick your browser from the choices below and follow the instructions. For details, see: [www.aboutCookies.org](http://www.aboutCookies.org).
- 15.3. You probably have Adobe Local Shared Objects on your computer, also known as LSOs or Flash Cookies. Generally, you can't delete them with browsers controls, but Adobe's website offers tools to control Flash Cookies on your computer. For details, see: [http://www.macromedia.com/support/documentation/en/flashplayer/help/settings\\_manager07.html](http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager07.html).
- 15.4. Users of the Firefox browser can also get an add-on to detect and delete Flash Cookies. For details, see: <https://addons.mozilla.org/en-US/firefox/addon/betterprivacy/>
- 15.5. We recommend you that you leave Cookies enabled, as they allow you to access some of our website's essential features. If you wish to disable Cookies, please be aware that the functionality of your experience will be reduced.

## **16. USEFUL INFORMATION ABOUT COOKIES**

16.1. Further information about Cookies can be found on the following websites:

- [www.youronlinechoices.com](http://www.youronlinechoices.com)
- [www.allaboutCookies.org](http://www.allaboutCookies.org)

## **17. MONITORING AND REVIEW**

- 17.1. We will monitor on a regular basis the effectiveness of this Cookies Policy and Disclosure and, in particular, the execution quality of the procedures explained in the Policy and, where appropriate, we reserve the right to correct any deficiencies.
- 17.2. We will inform our clients of any material change to this Cookies Policy and Disclosure by posting an updated version of this Cookies Policy and Disclosure on our Website(s).

## 18. CONSENT

- 18.1. By accessing and/or using our Website(s) and/or our services, you are consenting to our placing Cookies on your computer in accordance with this Cookies Policy and Disclosure. Please read this Cookies Policy and Disclosure carefully for more details about the information we collect when you use our Website(s).
- 18.2. If you do not wish to accept Cookies pursuant to this Cookies Policy and Disclosure in connection with your use of our Website(s), you must stop using our Website(s).

## 19. MISCELLANEOUS

- 19.1. We reserve the right to review and/or amend this Cookies Policy and Disclosure, at our sole discretion, whenever we deem fit or appropriate.
- 19.2. The Board of Directors will review and approve/ratify this Cookies Policy and Disclosure at least annually.
- 19.3. Should you have a question about our Cookies Policy and Disclosure, please direct your questions to our Compliance Department: [compliance@traders-trust.com](mailto:compliance@traders-trust.com).

## APPENDIX A

### (DETAILS ABOUT THE COOKIES THAT ARE USED ON OUR WEBSITE(S))

#### PERFORMANCE COOKIES

These cookies allow us to count visits and traffic sources so we can measure and improve the performance of our site. They help us to know which pages are the most and least popular and see how visitors move around the site.

We use Google Analytics to provide this service, which uses 5 first party cookies. The data collected is not shared with any other party.

The information obtained with these cookies anonymized and we make no attempt to use it identify individual visitors, or influence your experience of the site while you are visiting it. If you do not allow these cookies, we will not be able to include your visit in our statistics.

If you have used a *'Do Not Track browser setting'*, we take this as a sign that you do not want to allow these cookies, and they will be blocked.

- `__utma`
- `__utm`
- `__utmc`
- `__utmz`
- `__utmt`
- `__utmb`

#### SYSTEM COOKIES

These cookies are used by our website to store anonymous session and login tokens. They may identify you as a single user when you move between pages, but carry no personally identifiable information and are destroyed when you close your browser, unless you actively choose to be remembered for easier login on your next visit.

- `__RequestVerificationToken`
- `__SessionId`

#### FUNCTIONALITY COOKIES

These cookies are used by our LiveChat software to store temporary user information to improved user experience in our website, but are destroyed when you close your browser.

- `Liveagent`

## TARGETING COOKIES

These cookies collect information about your browsing habits to make advertising relevant to you and your interests. These cookies collect the most information about users.

| <b>Cookie</b> | <b>Name</b>             | <b>Purpose</b>              | <b>Persistent/Session</b> |
|---------------|-------------------------|-----------------------------|---------------------------|
| Demandware    | dwpersonalization_XXXXX | Can be used for A/B testing | 31 days                   |
| Demandware    | country_data            | Stores locale               | Persistent                |