

# PRIVACY POLICY

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Owner(s):	TTCM CAPITAL MARKETS LIMITED
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**TTCM Capital Markets Limited**, a limited liability Vanuatu Financial Services Company, incorporated under the laws 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 (CAP.70) as a Principal by the VFSC.

# PRIVACY POLICY

## 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. 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..., hencefort "Information").
- 2.2. We use the Information we collect from you only as appropriate to provide you with quality service and security.

## 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.

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## 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.

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## 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.

## **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. CREDIT INFORMATION**

- 10.1. We do not share credit information, such as credit history, net worth, or other income information, except as otherwise provided herein.

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

- 11.1. Your telephone conversations, e-mails, internet conversations (chat), meetings and other communications with us may be recorded/maintained by us. 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.
- 11.3. 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.

## **12. OPT OUT**

- 12.1. 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.
- 12.2. 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.
- 12.5. 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.



## **13. CLIENT CONSENT**

- 13.1. 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 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.
- 13.2. 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.

## **14. MISCELLANEOUS**

- 14.1. We reserve the right to review and/or amend this Policy and arrangements, at our sole discretion, whenever we deem fit or appropriate.
- 14.3. 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).