

# Privacy Policy

Company Name

TTCM Traders Trust Capital Markets Ltd

Review Date

31/01/2025

Version

2025 01

## INTRODUCTION

1.1. TTCM Traders Trust Capital Markets Ltd is a Cyprus-based limited liability company, incorporated in accordance with Sections 14 and 6/132C(1) of the Companies Act 1981. It is officially registered with the Registrar of Companies under Company Number 250591, and its principal office is located at:

3 Thalias Str., 3rd Floor, Offices 310-318, 3011 Limassol, Cyprus.

### 1. RIGHT TO PRIVACY

2.1. We are committed to respecting the privacy rights of every individual. Our relationship with you is built on trust, and we take great care in ensuring your privacy and security. This Privacy Policy applies to both current and former clients, outlining how we gather and safeguard non-public personal information (such as your name, address, ID numbers, passport, driver's license, etc., hereinafter referred to as "Information").

2.2. The Information we collect is used solely to provide you with high-quality service and ensure your security.

### 2. INFORMATION WE COLLECT

3.1. As part of our regular business operations, we gather your information in the following circumstances:

- a) When you create an Account and provide us with Information through electronic registration forms;
- b) When you engage in transactions with us, including deposits and withdrawals;
- c) On occasion, we may collect additional Information about you from third-party sources, such as your credit history.

3.2. By submitting your Information, you consent to its collection, use, and storage as described in this Privacy Policy.

### 4. PERSONAL INFORMATION

4.1. When you apply for or maintain a live account with us, we collect personal details for business purposes, such as assessing your financial needs, processing your requests and transactions, informing you about relevant products and services, and providing customer support. This may include:

- a) **Application Information:** Information you provide on forms and applications, such as your name, address, date of birth, social security number, occupation, income, assets, and contact details like your address, phone number, and/or email address;
- b) **Transaction Information:** Data related to your transactions with us or our affiliates, as well as our communications with you, such as account balances, trading activity, inquiries, and responses;
- c) **Verification Information:** Information needed to verify your identity, such as a passport or driver's license, as well as public records or third-party data about you. Additionally, we may collect other identifiable information like identification or tax numbers and demographic details such as gender and birthdate. We may also assess your trading experience, average annual income, net worth, and risk tolerance.

4.2. Much of the Information we collect is directly provided by you through the completion of electronic forms (such as the Account Opening Application) on our Online Trading Platform, and by voluntarily submitting additional documents as required.

4.3. Moreover, you provide us with Information through your trading activity on our platform, by contacting us, or by engaging with any promotions. We may also indirectly collect data such as your Internet Protocol (IP) address, software configuration, operating system, and usage of Cookies.

## **5. USE OF COOKIES**

5.1. Cookies are small text files that a Website uses to monitor its visitors, which may be sent from us to your device and sometimes returned. These Cookies enhance your navigation experience and the usability of our Online Trading Facility. We may set and access Cookies on your device to determine which ads and promotions lead users to our platform.

5.2. We may also use Cookies in connection with our products and services to track your activities on our Website(s).

5.3. Cookies do not store any personally identifiable data. The information we gather and share through Cookies is anonymous and non-identifiable.

## **6. SECURITY MEASURES**

6.1. We safeguard your Information using advanced security technologies, including firewalls and data encryption tools. We employ 'Secure Socket Layer (SSL)' encryption to protect sensitive data submitted to us, ensuring that it cannot be intercepted during transmission.

6.2. We take extensive measures to secure our Websites and ensure they meet industry security standards. These measures include the use of firewalls, authentication systems (e.g., passwords and PINs), and access controls to prevent unauthorized access to systems and data.

6.3. We also require you to use your personal Access Codes (username and password) when accessing your account online. Access to Information within our offices is restricted, and only authorized personnel who need it for their duties can access it.

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

7.1. We may share the personal information described above with our affiliates for business purposes, such as servicing customer accounts, promoting new products and services, or assisting in the trading activities of the company, its affiliates, or employees, in compliance with applicable laws.

7.2. Our affiliates include companies that are controlled or owned by us, as well as companies that have an ownership stake in our company. The shared information may include your name, address, and account details. Our affiliates are required to protect your privacy to the same extent we do, in accordance with this Policy.

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

8.1. We do not disclose your personal data to third parties, except as outlined in this Policy.

8.2. In certain situations, we may share your personal data with third parties, such as non-affiliated companies that provide support services for your account or facilitate transactions with us, including those offering professional, legal, or accounting advice.

8.3. Non-affiliated service providers who assist us must keep your information confidential and may only use it for the purposes we specify.

8.4. We may also share your information with third parties to fulfill your instructions or upon your explicit consent.

## **9. REGULATORY DISCLOSURE**

9.1. In specific circumstances, we may disclose your personal data to comply with applicable laws and regulations. This includes cooperating with regulatory authorities or law enforcement to comply with subpoenas or official requests, or to protect our rights or property.

9.2. Except as outlined in this Policy, we will not use your personal information for any other purpose unless we notify you at the time of collection or obtain your consent.

## **10.CREDIT INFORMATION**

10.1. We do not disclose your credit information, such as credit history, net worth, or income details, except as specifically stated in this Policy.

## **11.RECORDING OF COMMUNICATIONS**

11.1. Your phone calls, emails, chats, meetings, and other communications with us may be recorded and stored. These recordings remain our property and are accepted by you as conclusive evidence of their content.

11.2. You agree that we may provide copies of these recordings to courts, regulatory bodies, or government agencies, including in disputes between us and you. However, technical issues may prevent us from recording a conversation, and any recordings or transcripts will be deleted as per our standard practice. Therefore, you should not rely on the availability of such recordings.

## **12.OPTING OUT**

12.1. While providing personal information is not mandatory, failure to do so may prevent us from opening or maintaining your account or providing services.

12.2. We strive to ensure that all the information we hold is accurate and up-to-date, and you can help by informing us of any changes to your details.

12.3. Please note that if you choose to opt-out, we will be unable to provide services to your account, and any open and funded accounts will be closed.

## **13.DATA RETENTION**

13.1. We retain your personal information for a minimum of five (5) years, calculated from the end of our business relationship with you.

## **14.CLIENT CONSENT**

14.1. By using our Website(s) and/or services, you consent to the transfer of your personal data (including personally identifiable information and payment details) to our subsidiaries and third-party companies that help process or analyze this information as part of the services we provide, both within and outside the European Economic Area.

14.2. Your personal data may also be used for marketing purposes or market research to promote products and services of potential interest to you and to support the effective delivery of our services, in accordance with this Policy.

## **15.MISCELLANEOUS**

15.1. We reserve the right to review and amend this Policy at any time, as deemed necessary.

15.2. If you have any questions about Privacy or Data Protection at 'Traders Trust,' please contact our Compliance Department at: [contact@ttcm-capital.com](mailto:contact@ttcm-capital.com).