

# Privacy Policy

## 1. Introduction

TTCM Capital Ltd (referred to as the "Company") is committed to ensuring the privacy and security of clients' personal and financial data. By opening a trading account with the Company, clients acknowledge and consent to the collection, processing, storage, and use of their personal information as outlined in this policy. TTCM Capital Ltd operates as a regulated Securities Dealer under the oversight of the Financial Services Authority of Seychelles, holding licence number 107/09 (hereinafter referred to as "the Company").

## 2. Collection of Personal Data

When applying for a demo or live trading account, clients are required to provide specific personal details. This information is necessary for the Company to assess applications in compliance with the applicable laws and regulations governing financial services. Additionally, the Company utilizes this data to communicate with clients about the services it provides.

The personal data collected may include, but is not limited to, the client's full name, residential address, email, phone number, date of birth, gender, and nationality. Employment and occupational details, financial status (such as income, assets, net worth, and sources of funds), tax-related data, IP address, and geolocation information may also be gathered. Furthermore, banking details, e-wallet and credit card information, as well as identity verification documents like passports, national identification cards, utility bills, and bank statements, may be required. If the applicant is a legal entity, the Company may also collect company incorporation records, financial history, investment details, and other relevant supporting documents.

## 3. Collection and Processing of Personal Data

The Company gathers and processes personal data necessary for assessing, establishing, and maintaining the contractual relationship between the Client and the Company. In certain instances, the Company may also process personal information to pursue its own legitimate interests or those of third parties, provided that such processing does not override the fundamental rights and interests of the Client.

Based on the above, the Company may utilize the Client's personal data for various purposes, including but not limited to: verifying identity, processing transactions, managing trading accounts, maintaining business records, analyzing statistical data, and detecting, preventing, and investigating fraudulent activities prohibited by relevant laws. Additionally, personal data may be used to defend against legal claims, comply with court rulings, judicial proceedings, or other legal requirements imposed by competent authorities.

In compliance with Anti-Money Laundering (AML) regulations, the Company is legally obligated to retain certain documents to demonstrate its adherence to legislative requirements when requested by regulatory authorities.

If there is no legal basis for processing the Client's personal data as outlined above, the Company will seek explicit consent from the Client before proceeding.

#### **4. Sharing and Transfer of Personal Information**

The Company may disclose Client information to business partners and service providers with whom it collaborates or has outsourced specific business functions. In some cases, the provision of services to Clients may require the transfer of personal data to parties located outside Seychelles, including the European Economic Area (EEA) or other jurisdictions where data protection laws may not be equivalent to those in the EU. In such cases, the Company will implement reasonable safeguards to ensure the confidentiality and security of the Client's information. By submitting personal data, Clients consent to its transfer, storage, and processing as described.

The Company may also share personal information with affiliated entities or other companies within its corporate group if such disclosure is necessary to facilitate the provision of services. Additionally, data may be shared with partners, affiliates, or associates to offer relevant products and services that align with Client needs, but only if the Client has expressly authorized such communication.

For Clients referred by a Business Introducer, the Introducer may have access to certain Client information. By engaging with the Company's services, Clients acknowledge and consent to the sharing of relevant data with the referring Business Introducer.

All third parties receiving personal information from the Company must adhere to relevant data protection laws and maintain security standards equivalent to those upheld by the Company. The Company does not disclose Client information to third parties that fail to meet these privacy and security requirements.

#### **5. Disclosure of Personal Data**

The Company upholds strict confidentiality regarding Client information and will not disclose such data to third parties unless required by a competent regulatory authority, applicable laws, or relevant regulations. Disclosure may also occur when there is a legitimate interest or legal obligation to do so, or when explicitly requested or authorized by the Client. Any disclosure will be carried out on a "need-to-know" basis, unless directed otherwise by a regulatory body. In cases where information is shared, the Company will ensure that the recipient is made aware of its confidential nature.

#### **6. Cookies**

The Company utilizes cookies to collect data on Client interactions with its website (<https://ttcm-capital.com>) and the services provided.

To analyze website performance and enhance user experience, the Company may share aggregated website usage statistics with trusted advertising partners and affiliated entities. However, this data does not contain personally identifiable information. Additionally, the Company may engage third-party service providers to monitor and analyze website traffic and usage patterns. These third parties may deploy cookies on behalf of the Company, but such cookies do not store personally identifiable details.

Most web browsers are configured to accept cookies by default. Clients who prefer not to receive cookies may modify their browser settings to block or prompt them before accepting cookies. However, disabling cookies may negatively impact website functionality, reduce platform performance, and impair the quality of services associated with the Client's trading account. Therefore, it is recommended that Clients allow cookies to optimize their experience.

## **7. Amendments to the Privacy Policy**

The Company reserves the right to modify this Privacy Policy at its discretion. Any updates will be reflected in a revised version published on the Company's website. Clients are encouraged to periodically review the policy, as continued use of the website following any modifications will constitute acceptance of the changes.

## **8. Legal Disclaimer**

The Company shall not be held responsible for any misuse or loss of personal data resulting from cookies present on its website(s) that are beyond the Company's control. Additionally, the Company is not liable for any unauthorized or unlawful access to a Client's personal information caused by the mishandling, loss, or unauthorized use of passwords, whether due to negligence, malicious intent, or any other factor outside the Company's responsibility.

## **9. Contacting the Company**

For further details regarding this Privacy Policy or any related inquiries, Clients may contact the Company using the following information:

- **Email:** [contact@ttcm-capital.com](mailto:contact@ttcm-capital.com)
- **Address:** 3 Thalias Str., 3rd Floor, Offices 310-318, 3011 Limassol, Cyprus