

PRIVACY POLICY

1. Introduction

The Privacy Policy of the TF Global Markets (International) Ltd (hereinafter, “the Company”, “ThinkMarkets”) applies to existing and potential Clients as well as to any person visiting any website operated by the Company. ThinkMarkets is responsible to protect the privacy of all personal data that acquires, and to manage the protection of privacy and the safekeeping of Clients ‘personal and financial information. The Company has taken measurable steps to protect the confidentiality, security, and integrity of your information.

The Company is committed to protecting your privacy and personal information. We have created this Privacy Policy to let you know what information we collect when you use our services, why we collect this information and how we manage this information. It is our policy to respect the confidentiality of personal information and the privacy of individuals. We are bound by the Data Protection Act and relevant laws and regulations.

We may periodically make changes to this Privacy Policy and will notify you of these changes by posting the modified terms on our website. In case of doubt, Personal Information we collect, and hold is governed by the current version of this Privacy Policy on our website at the relevant time, we recommend that you revisit this Privacy Policy regularly. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

It is important that you read this policy together with any other policy statement or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This policy supplements the other notices and is not intended to override them.

This website is not intended for children and we do not knowingly collect data relating to children.

2. Data Controller

The Company is the data controller of your personal information and this policy applies to the processing of activities by the Company and any trading names the firm operates for example ThinkMarkets, ThinkForex and Trade Interceptor.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this policy. If you have any questions about this policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

Contact details

Our full details are:

Full name of legal entity: TF Global Markets (International) Ltd

Name or title of DPO: Data Protection Officer

Email address: compliance@thinkmarkets.com

Office address: ThinkMarkets, CORPORATE MANAGEMENT SOLUTIONS (CAYMAN) LTD., P. O. Box 799, Two Artillery Court, 2nd Floor, 161 Shedden Road, Grand Cayman KY1-1103, Cayman Islands

You have the right to make a complaint at any time to CIMA. We would, however, appreciate the chance to deal with your concerns before you approach CIMA so please contact our DPO in the first instance.

3. Collection of Personal Data

Why do we collect information?

As part of providing services, or information about our services, to you, and to ensure we do this in a compliant way, under the authorisation of our regulator, we must collect some personal information from our Clients, potential Clients, visitors to our website and service providers or suppliers. This may include third parties carrying out credit or identity checks on our behalf. The credit search is not seen or used by lenders to assess your ability to obtain credit and is required to adhere to money laundering regulations.

When you apply to open an account, when you maintain an account with us, or request a service we will require you to provide us with information about you. We will need to use the information in certain ways – from basic needs like verifying your identity to more complex things like determining whether financial trading is appropriate for you and processing your requests and transactions. We may need to use your personal information to comply with applicable law, court order or other judicial process, or the requirements of any applicable regulatory authority.

We may collect your name and contact details (such as your email address, phone number or address) in order to send you information about our products and services which you might be interested in. We may collect this directly from you, or through a third party. If a third party collected your name and contact details, they will only pass those details to us for marketing purposes if you have consented to them doing so. It is in our legitimate interest to use your personal information in such way. If you do not wish to receive this information, please contact us by emailing our customer service team at support@thinkmarkets.com.

Our web pages and emails may contain; cookies, web beacons or pixel tags or any other similar type of data analysis tools which allow us to track receipt of correspondence and to count the number of users that have visited our webpage or opened our correspondence.

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Information collected

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are certain types of more sensitive personal data which require a higher level of protection, such as information about a person's health or sexual orientation. Information about criminal convictions also warrants this higher level of protection.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, maiden name, last name, proof of identity, username or similar identifier, marital status, title, date and place of birth and gender, country of residence and citizenship.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers proof of address.
- **Professional Data** includes level of education, profession, employer name, work experience in Forex/CFD's, information on Client's experience, knowledge in forex industry and risks.
- **Tax Data** include country of tax residence and tax identification number.
- **Financial Data** includes annual income, net worth, source of funds, anticipated account turnover, bank account, bank statements, payment card details and copies, E-wallet information.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us, deposit methods, purpose of transactions with us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We may also collect, store and use the following more sensitive types of personal information such as information about criminal convictions and offences.

We also collect, use and share aggregated data such as statistical or demographic data for any purpose. Non-Personal Data may be derived from your personal data but is not considered

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personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this policy.

We obtain this information through your use of our services or other dealings with us including through any of our websites, apps, the account opening applications, demo sign up, webinar sign up, subscribing to news updates and from information provided in the course of ongoing customer communication.

This information is held by us on servers based in the United Kingdom, New York and Hong Kong. In addition, when you interact with our services, our servers keep an activity log unique to you that collects certain administrative and traffic information including: source IP address, time of access, date of access, web page(s) visited, language used, software crash reports and type of browser used. This information is essential for the provision and quality of the services. We do not collect personal information about you while using the services without your knowledge.

We collect information about visitors to our premises. We may record information on your visit, including the date and time, who you are visiting, your name, employer, contact details and vehicle registration number.

We may record any communications, electronic, by telephone, in person or otherwise, that we have with you in relation to the services we provide to you and our relationship with you. These recordings will be our sole property and constitute evidence of the communications between us. Any telephone conversation may be recorded without the use of a warning tone or any other further notice.

Failure to provide personal data

We need to collect your personal data as part of statutory obligations or as part of the contractual arrangements we have with you. If you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

Management of personal information

We always take appropriate technical and organisational measures to ensure that your information is secure to ensure your personal information is protected from misuse, interference or loss, and unauthorised access, modification or disclosure. Your personal information is generally stored in our computer database. Any paper files are stored in secure

areas. In relation to information that is held on our computer database, we apply the following guidelines:

- passwords are required to access the system and passwords are routinely checked;
- data ownership is clearly defined;
- employees have restricted access to certain sections of the system;
- the system automatically logs and reviews all unauthorised access attempts;
- unauthorised employees are barred from updating and editing personal information;
- all computers which contain personal information are secured both physically and electronically;
- data is encrypted during transmission over the network; and
- print reporting of data containing personal information is limited.

We train our employees who handle personal information to respect the confidentiality of Client information and the privacy of individuals. We regard breaches of your privacy very seriously and will impose appropriate penalties, including dismissal where necessary.

How do we store personal information and for how long

Safeguarding the privacy of your information is important to us, whether you interact with us personally, by phone, by mail, over the internet or any other electronic medium. We hold personal information in a combination of secure computer storage facilities and paper-based files and other records and take steps to protect the personal information we hold from misuse, loss, unauthorised access, modification or disclosure. When we consider that personal information is no longer needed, we will remove any details that will identify you or we will securely destroy the records.

However, we may need to maintain records for a significant period of time. For example, we are subject to certain anti-money laundering laws which require us to retain:

- a copy of the documents we used to comply with our customer due diligence obligations; and
- supporting evidence and records of transactions with you and your relationship with us, for a period of five (5) years after our business relationship with you has ended.

Means of collecting and processing personal information

We generally collect personal information directly from you. For example, personal information will be collected through our application processes, forms and other interactions with you during providing our services, including when you visit our website, call us or send us correspondence. We will only use the personal information as set out in this Privacy Policy. We will not retain or have access to any debit/credit card information. We will not collect sensitive information about you without your consent unless an exemption in the regulations applies. These exceptions include if the collection is required or authorised by law or necessary to take appropriate action in relation to suspected unlawful activity or serious misconduct.

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If you do not provide us with the personal information we request, we may not be able to provide you with our products or services or meet your needs appropriately.

We may also collect personal information about you from a third party, or share information with a third party, such as identity verification services, regulators, your introducing broker (as applicable), marketing agencies, online vendors and service providers, and from customer lists lawfully acquired from third parties. In addition, we may engage the services of third-party service providers to provide technical support, process your online transactions and maintain your account. We take steps to ensure that our arrangements with third-party service providers and online vendors protect your privacy. Any personal information will only be disclosed to third parties in accordance with this Privacy Policy. We do not sell or rent your personal information.

Information use

We use the personal information we collect from you to deliver our services, to provide client support, to undertake necessary security and identity verification checks, to comply with relevant laws and regulations and other legal obligations, to process any of your online transactions, to assist your participation in third-party promotions, meet certain business requirements and for any other purpose related to the operation of the services. Your personal information may also be used by us to provide you with promotional offers and information regarding our products and services and in order for us to better provide a range of products and services and improved customer service. From time-to-time, we may request information from you via surveys. Participation in these surveys is completely voluntary, and, therefore, you have the choice of whether or not to disclose such information. Information requested may include contact information (such as name, correspondence address and telephone number), and demographic information (such as postal code or age).

Certain excluded disclosures

We may disclose your personal information if required to do so by law, or if we believe in good faith that such action is necessary to:

- (1) comply with any legal process served on us or in circumstances where we are under a substantially similar legal or regulatory obligation;
- (2) protect and defend our rights or property;
- (3) act to protect the personal safety of users of the services or the public. If, in our sole determination, you are found to have cheated or attempted to defraud us, our Affiliates, or any other user of the Services in any way including, but not limited to, price manipulation or payment fraud, including use of stolen credit cards, or any other fraudulent activity (including any chargeback or other reversal of a payment) or prohibited transaction (including money laundering).

We reserve the right to share this information (together with your identity) with other financial CFD providers, banks, credit card companies, and appropriate regulatory and legal agencies.

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Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Promotional Offers from Us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased services or products from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

Opting Out

You can ask us to stop sending you marketing messages at any time by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or by **Contacting** us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that you can still access this website and it will function properly. Cookies are used on this website in order to offer our users a more customized browsing experience.

For more information about the cookies we use, please see our [Cookie Policy](#).

Change of Purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please **Contact** us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

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Change of Control

If there is a change of control/ownership at TF Global Markets (International) Ltd (e.g., in the course of a transaction like a merger, acquisition, bankruptcy, dissolution, liquidation), your personal information may be transferred accordingly.

You will not lose access to your account(s) or the right to claim any of your rights under this Privacy Policy. The new controllers will be required to abide to the requirements of this Privacy Policy.

Transfer of personal data abroad

We may need to transfer your information to other group companies or service providers in countries in or outside the Cayman Islands. This may happen if our servers or suppliers and service providers are located elsewhere. When we transfer your personal data, we endeavour to protect your privacy and rights by ensuring the recipient has adequate systems and measures to safeguard data.

By using or participating in any service and/or providing us with your information, you consent to the collection, transfer, storage and processing of your information outside of the Cayman Islands.

We may share your personal information with:

- (1) Share with External Third Parties (as set out in glossary);
- (2) Share with Specific Third Parties (as set out in glossary);
- (3) Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this policy;
- (4) Measurement and Analytics Services: Partners who use our analytics services like Google Analytics (Non-Personally Identifiable Information Only). We do not share information that personally identifies you (personally identifiable information is information like name or email address that can by itself be used to contact you or identifies who you are) with advertising, measurement or analytics partners.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

ThinkMarkets does extensive due diligence before choosing processors. Our processors provide sufficient guarantees that they implement appropriate technical and organisational measures in such a manner that processing will meet the requirements of the relevant law and regulations and ensure the protection of the data subjects rights. The adherence of our processor(s) to approved code(s) of conduct, besides the Agreement/Contract or an approved

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certification mechanism, is used as an element to demonstrate compliance with the obligations of the controller. We ensure that any contract signed between us and our processors is binding as per applicable legislation. The contracts will be setting out the subject-matter and duration of the processing, the nature and purposes of the processing, the type of personal data and categories of data subjects, taking into account the specific tasks and responsibilities of the processor in the context of the processing to be carried out and the risk to the rights and freedoms of the data subjects. After the completion of the processing, the processor(s) should, at the choice of the controller, return or delete the personal data, unless there is a requirement to store the personal data under Union or Member State law to which the processor is subject. The data sharing with our processor(s) enables us to proceed, for instance, with our regulated activities and duties as KYC in order to meet our regulatory obligations.

Whenever we transfer your personal data, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use contracts which give personal data the same protection it has in the Cayman Islands.

4. How do we respond to legal requests to prevent harm?

We access, store and share your information with regulators, law enforcement or others by request:

- We may need to respond to legal, regulatory or judicial requests and/or court orders.
- We may need to detect, prevent and address fraud, unauthorised use of our services or products, violations of our terms or policies, or other harmful or illegal activity; to protect ourselves (including our rights, property or products), you or others, including part of investigations or regulatory inquiries; or to prevent death or imminent bodily harm. For example, if relevant, we provide information to and receive information from third-parties about the reliability of your account to prevent fraud, abuse and other harmful activity on and off our products.

Information we receive about you (including financial transactions, deposits and withdrawals) can be processed and preserved for an extended period of time when it is the subject of a legal request or obligation, governmental investigation, or investigation of possible violations of our terms or policies, or otherwise to prevent harm.

5. Your rights relating to your Personal Data

- You have the right to be informed
- You have the right to access your personal data and certain information about its use
- You have the right to rectify your data

- You have the right to require that processing of your personal data cease, not begin at all, or cease for a specified purposes or in a specified manner
- You have the right to require that we cease the processing of your personal data for direct marketing purposes
- You have the right to require that processing of your personal data cease, if a decision that significantly affects you is made based solely on the processing of your personal data by automatic means.
- You have the right to seek rectification, blocking, erasure or destruction of inaccurate personal data
- You have the right to complain to the Ombudsman regarding your personal data or on behalf of another person regarding their personal data (with proper authorization) (www.ombudsman.ky)

6. Technical and Operational Security Measures

The Company has put in place appropriate security measures to protect the security of its' Client's personal data and prevent any unauthorized or unlawful processing, accidental loss, destruction, alteration, disclosure or damage on Client's personal data. The Company implements appropriate technical and organisational measures such as network traffic encryption, pseudonymization, data encryption, two-factor authentication, access management procedure, tokenization, clean desk policy, business continuity and disaster recovery, IT systems risk assessment, physical and logical access segregation, process in case of personal data breach policy etc. The Company limits access to the Client's personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process the Client's personal data on the Company's instructions and they are subject to a duty of confidentiality.

Details of these measures are available upon request. In addition, the Company, has put in place procedures to deal with any suspected data security breach and will notify the Client and any applicable regulator of a suspected breach where the Company is legally required to do so.

7. Automated decision-making and profiling

In order to perform the contract between us and as authorized by the relevant regulations, it is requested for the provision of the investment services to you and once per calendar year thereafter, to assess your knowledge and experience, your financial situation and investment objectives and your risk profile. We fulfil the above requirements through the following tools:

Appropriateness Test: it takes place when you require to register as client of the Company. Hence, we need to check and ensure that you are suitable for the provision of the Company's services and products by taking an appropriateness test in regards to your knowledge, financial background and experience in regards to financial services. Based on the scoring you receive, you will be informed whether you are eligible to receive our services and become our Client and the maximum level of leverage you are eligible to. The reason for assessing your

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appropriateness is to enable the Company to offer to you services suitable to you and act in the Client's best interest.

The scorings above are monitored by the Company's Compliance department and you may see your results and an explanation of the scoring or to challenge the decision by sending an email to compliance@thinkmarkets.com. During these processes, the Company takes all the technical and operational measures to correct inaccuracies and minimize the risk of errors, to prevent any discrimination and to secure personal data of the client.

8. Recording of telephone conversations and of electronic communication

We record, monitor and process any telephone conversations and/or electronic communications between us such as through fax, email, social media, electronic messages, either initiated from the Company's side or your side. All such communications are recorded and/or monitored and/or processed by the Company, including any telephone conversations and/or electronic communications that result or may result in transactions or client order services even if those conversations or communications do not result in the conclusion of such transactions. The content of relevant in person conversations and/or communications with you may be recorded by minutes or notes. Any such records shall be provided to you upon request at the same language as the one used to provide investment services to you.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing, where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

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- **Request the restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Right to withdraw consent** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please Contact us.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. Queries and Contact

If you have any questions which have not been covered in this Privacy Policy, or any further concerns regarding the use of Personal Data, please do not hesitate to Contact us.

11. Glossary

“Comply with a legal or regulatory obligation”: means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

“Legitimate Interest”: shall mean the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by Contacting us.

“Performance of Contract”: means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

“Personal data breach”: means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed;

“Profiling”: means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements;

“Third Parties”: shall mean external third parties and specific third parties;

As **External Third Parties** we shall mean:

- Service providers [acting as processors] such as IT and system administration services.
- Professional advisers [acting as processors or joint controllers] including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- Regulators and other authorities [acting as processors or controllers] based in the Cayman Islands who require reporting of processing activities in certain circumstances.

As **Specific Third Parties** we define the following:

- Supervisory and other regulatory and public authorities, in as much as a statutory obligation exists. This may include but is not limited to disclosures to the CIMA, tax authorities, and criminal prosecution authorities [Controllers of personal data];
- External compliance companies [Processors of data];
- IT and trading platforms administration providers [Processors of Data];
- Translating Agencies [Processors of Data];
- Communication Support Services [Processors of Data]
- Professional firms [Processor of Data];
- Auditors [Processors of Data];
- Card payment processing companies and payment service providers [Controller of Data];
- Cloud storage companies [Processors of Data]