



## PRIVACY POLICY

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This Privacy Policy describes how Trade Principal Group (hereinafter referred to as 'the Company') collects and uses information through its website [www.tradeprincipal.com](http://www.tradeprincipal.com), and any other related websites and applications, including among others, the Company's Customers Area. This Privacy Policy does not apply to websites operated by any other organizations and/or other third parties.

### We Are Committed to Protecting Your Privacy

The Company respects the privacy of any users who accesses its website(s), and it is therefore committed to taking all reasonable steps to safeguard any existing or prospective clients, applicants and website visitors.

### What Personal Information Do We Collect?

In order to open an account with us, you must first complete and submit an application form to us by completing the required information. By completing this application form, you are requested to disclose private information in order to enable the Company to evaluate your application and comply with the relevant rules and regulations. The information you provide may also be used by the Company to inform you regarding its services. Moreover, your personal information may also be collected through any correspondence made with us by phone, e-mail or otherwise, including personal data that you enter when you register to use our website, subscribe to our services or any other activities carried out on our website or any connected applications.

### Protecting and Safeguarding your Personal Data

The Company shall not disclose any of its clients' confidential information to a third party, unless required to do so by a regulatory authority of a competent jurisdiction. The Company will endeavor to make such disclosures on a 'need-to-know' basis, unless otherwise instructed by a regulatory authority. Under such circumstances, the Company shall expressly inform the third party regarding the confidential nature of any such information.

Clients accept and consent that the Company may, from time to time, analyze the data collected for statistical purposes in order to improve the Company's business activities.

### Disclosure of Your Personal Information

The Company may share your personal information with any members of our group of companies, which means that any of our ultimate holding companies and their





respective subsidiaries may receive such information. We may also share your information with certain third parties, including service providers and specialist advisers who have been contracted to provide us with administrative, financial, insurance, research or other services, as well as with business introducers, business parties, courts, tribunals and regulatory authorities as agreed or authorized by law. In the event that the Company discloses your personal information to business parties, such as card processing companies or banks, in order to perform the services requested by clients, such third parties may store your information in order to comply with their legal and other obligations.

## **Information Collected from Your Use of Our Services**

Tracking systems used on the Company's website(s) may collect your personal data in order to optimize the services provided there for clients. The website collects information in the following ways:

### **Device information**

By recognizing your device used to access and use the Company's website(s), we can provide you with the most appropriate version of our website(s).

### **Log information**

Logging certain behaviors on the site enables the company to track user action and therefore troubleshoot any issues that may occur.

### **Location information**

Using your IP address helps us localize our website content, which we provide to you based on your country, and improve your user experience on our site(s).

### **Cookies**

Cookies are text files with a small amount of data sent from our website(s) to your browser and stored on your computer's hard drive. Cookies help us improve the performance of our website(s) and our website visitors' experience, track your referrer and improve our future advertising campaigns.

### **Local storage**

You must submit validation documents to us through the Company's Members Area in order to activate your trading account. These documents are transmitted over a secure 128-bit SSL connection and stored in a safe location.

## **Choice to Opt Out Submitting Your Personal Information**

Should you not want us to use your personal information, you must inform the Company in writing. If you decide to do so, we may not be able to continue to provide information,



services and/or products requested by you and we will have no liability to you in this respect.

## Updating Your Information

You may inform the Company at any time that your personal details have changed by e-mailing us at [info@tradeprincipal.com](mailto:info@tradeprincipal.com). The Company will change your personal information in accordance with your instructions. To proceed with such requests, in some cases we may need supporting documents from you as proof, i.e. personal information that we are required to keep for regulatory or legal purposes.

## Cookies

Internet cookies are small pieces of data sent from our website(s) to your browser and stored on your computer's hard drive when using our site(s), and they may include a unique identification number. The purpose of collecting this information is to provide you with a more relevant and effective experience on our website(s), including the presentation of our web pages according to your needs or preferences.

Cookies are frequently used on many websites on the internet, and you can choose if and how a cookie will be accepted by changing your preferences and options in your browser. You may not be able to access some parts of our website(s) if you choose to disable the cookie acceptance in your browser, particularly in the Company's Members Area and other secure parts of our website(s). We therefore recommend you to enable cookie acceptance in order to benefit from all our online services.

## Security and Protection of Your "Registered" Information

The personal information you provide us with when registering yourself as a user of the Company's site(s) and/or of its services is classified as registered information, which is protected in several different ways. You can access your registered information after logging in to the Members Area by entering a username and a password that you select. It is your responsibility to make sure that your password is only known to you and not disclosed to anyone else. Registered information is securely stored in a safe location and only authorised personnel have access to it via a username and a password. All personal information is transferred to the Company over a secure 128-bit SSL connection and thus all necessary measures are taken to prevent unauthorised parties from viewing any such information. Personal information provided to the Company that



does not classify as registered information is also kept in a safe place and accessible by authorised personnel only via a username and a password.

You have (subject to certain exceptions) the right to obtain any personal information that the Company holds about you and inform the Company of any perceived inaccuracies. To make a request, please write to us by verifying your identity and specifying what information you require. We will acknowledge your request and respond to it within 40 days of receipt of your application including any applicable fees.

Transmission of information via the internet is not always completely secure but the Company endeavors to protect your personal data by taking serious precautions. Once we have received your information, we will apply procedures and security features to try to prevent unauthorized access. Furthermore, the data we collect from you may be transferred to and stored at a destination outside the European Economic Area (EEA). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be, among others, engaged in the fulfillment of your requests, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing and processing. The Company will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

## **Legal Disclaimer**

The Company reserves the right to disclose your personally identifiable information as required by rules and regulations and when the Company believes that disclosure is necessary to protect our rights and/or to comply with any judicial and/or other proceedings, court order, legal process served or pursuant to governmental, intergovernmental and/or other regulatory bodies. The Company shall not be liable for misuse or loss of personal information and/or otherwise on the Company's website(s) that the Company does not have access to or control over. The Company will not be liable for unlawful or unauthorized use of your personal information due to misuse or misplacement of your passwords, negligent or malicious intervention and/or otherwise.

## **Changes in this Privacy Statement**

Our Privacy Policy Statement is reviewed from time to time to take into account new laws and technologies, changes to our operations and practices, and to ensure that it remains appropriate to the changing environment.



**If we decide to change our Privacy Policy, we will post those changes to this Privacy Policy Statement and other places we deem appropriate so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it.**

## **Enquiries**

**If you have any enquiries regarding this Privacy Policy, please e-mail us to [info@tradeprincipal.com](mailto:info@tradeprincipal.com)**