

Privacy Notice

The website <u>www.gtcm.com</u> is operated by Depaho Ltd (hereinafter referred to as "**the Company**" or "**we**"). By accepting the Privacy Notice and receiving the services of the Company, you are agreeing to the terms which outline how the Company handles and protects your personal information.

The Company is committed to the responsible handling and protection of personal information. Please read this Privacy Notice carefully and <u>Contact Us</u> if you have any questions about our privacy practices or your personal information choices, and their handling.

It is important that you check back to this Privacy Notice often for updates. For further information, please visit our <u>Privacy Policy</u>. The Company will be notifying you of any material changes.

What personal information we collect

Personal information is collected during your application for a trading account, and upon your agreement to the use of the services of the Company. The information collected may also include the of internet browser you are using, the operating system of your computer, and where applicable, your IP address, information relating to your internet service provider and use of our services.

How we use your personal information

The Company uses your personal information for the purpose of satisfying regulatory and legal requirements, for marketing, for administration and personalized customer service. We may need to share your information with our service providers and tied agents. We retain information for a certain period of time further to your consent and as indicated in our Privacy Policy. We may receive personal information about you from various third parties and public sources and we may share your personal information with our service providers and tied agents, where necessary for the provision of the services of the Company. We require that the latter handles and obtains information in a confidential way, respects the right to privacy, and complies with Data Protection rules and regulations, including this Privacy Notice and Privacy Policy.

The Company and third parties or tied agents acting on its behalf, may use your personal information:

- To inform you or send you material regarding our products and services;
- To perform identity and/or money laundering and/or fraud prevention checks;
- To perform credit checks by contacting any financial institution or credit facility;
- To send you text messages and/or email communication regarding, inter alia, trading alerts, margin calls or other information relating to your trading account.

To update your trading account information or email marketing preferences, or for technical support or other help, please visit our Privacy Policy or Contact Us.

11 May 2018



Your consent to the processing of personal information for the above purposes, is provided to us when you share your personal information with us. You also consent to the processing and transferring of your personal information to countries or jurisdictions which may not provide the same level of information protection. For legal purposes we may monitor and record communication with you.

Use of Cookies

Cookies are a kind of short-term memory which is stored in the visitor's or client's internet browser and enable websites, platform(s) and mobile application(s) to 'remember' bits of information between pages or visits. The installation of Cookies or similar applications may require the separate consent of the user.

We use Cookies for many different reasons, with the aim of creating a safer and more efficient environment for our visitors and clients. We mainly use Cookies which are necessary for the provision of services offered through our website, platform(s) and mobile application(s), as well as for statistical purposes.

Consent to our Cookies policy is obtained through the "cookies permission" settings in your internet browser and mobile device. If a user does not wish to receive Cookies, he/she may be able to change the settings of the browser or mobile device to refuse all Cookies or to receive notification each time Cookies are sent, as these are usually set to accept Cookies by default. This may, however, impair the quality of the services that are being provided in relation to the trading account. For more information on the types of Cookies and how to manage them, please visit our Privacy Policy or Contact Us.

Safeguarding of information and access

The Company takes appropriate measures to ensure that the information you disclose is secure, accurate, up to date and kept for as long as necessary.

The Company holds personal information in secure facilities, and where the information is held electronically, on secure servers using safeguards and access control mechanisms to control unauthorised access, such as: firewalls; authentication systems; encryption of transmission links when necessary; regular review of the information collection, storage and processing practices, including physical security measures; and restricted access to personal information from employees, contractors and agents who need to know that information in order to process it for us and who are subject to strict contractual confidentiality obligations.

You are entitled to ask for copy of your personal information and to correct your records. You may contact the Company and request to amend and/or correct and/or update and/or delete any of your personal information. For more information, please visit our Privacy Policy or Contact Us.



You have the right to ask the Company not to process your personal information for marketing purposes. You can exercise your right to prevent such processing by contacting us.

Contact Us

Depaho Ltd is the controller of your personal information. Any questions, comments, and requests regarding your personal information or this Privacy Notice should be addressed to the Data Protection Officer in writing at <u>dpo@gtcm.com</u> or via telephone at +35722300500.

The provisions of this Privacy Notice apply to visitors to our website, former clients, current clients, applicants and recipients of our services.

This Privacy Notice does not apply to third party websites and/or social networking services which our services and websites are linked to or which are advertised on our websites. The Company is not responsible for the security and privacy of third party websites and/or social networking services, and these operate their own policies which we encourage you to read.