

# **PRIVACY POLICY**

**ThreeTrader Global Limited**

**Company Number 40430**

**Authorized and regulated by VFSC**

## **Introduction**

This Policy outlines how ThreeTrader Global Limited (the “Company”) collects, uses and discloses personal information about you.

This Policy applies to existing and potential clients as well as to any visitors of the Company website.

The Company is committed to protecting the privacy of all personal information which it obtains from you, including information obtained during your visits to this website.

## **Collection of Personal Information**

The Company will only use your personal information in accordance with worldwide information protection practices.

The Company will collect and maintain personal information through its account opening process and subsequent interactions and dealings with you.

The Company collects certain personal information in order that it may meet the needs of its customers through the efficient provision of services. By collecting certain personal information, the Company is able to monitor and improve the services and products which it offers to its existing and potential customers.

Personal information collected includes but is not limited to:

- Personal details such as name, address, telephone number and/or email address;
- Financial details such as estimated annual income and net worth, trading experience and investment knowledge;
- Identify Verification Documents such as passport and ID, utility bills, and/or bank statements or your company incorporation certificates/details.

The Company may derive information from your use of our website and may store this information with your personal profile. This information may include site areas visited, pages viewed, frequency and duration of visits, types of transactions conducted, documents downloaded and other websites which may have referred you or to which you link. This information is used to evaluate and improve the preference of our website.

## **Use of Personal Information**

The Company may use your information for any one or more of the following purposes:

- To confirm your identity;
- To maintain your personal profile;
- To access your suitability to the products and services we provide;
- To provide the services to you that you have requested including processing transactions;

- To provide you with transaction and post transaction related services;
- To inform you of products and/or services that may be of interest to you;
- To keep you updated on the issues that are relevant to your business relationship with us;
- To tailor the website to your needs and interests;
- To analyze impersonalized statistical information to enable us to provide you with better products and/or services;
- To administer your account and monitor its conduct and assess and analyze any credit limit, including, the interest rate, fees and other charges to be applied to the Client's Account;
- To pass your personal information to third parties for marketing purposes without prior written consent.

### Retention of Personal Data

The Company will, as required by Law, retain your personal information on record for a period of at least five (5) years, which is calculated after the execution of the transactions or the termination of the business relationship.

### Monitoring and Recording

The Company will, as required by Law, monitor and record any communication you have with us whether in writing, by phone or by electronic mail.

### Consent

You consent to the Company using your personal data for the above-stated purposes

## **Disclosure of Personal Information**

The Company may be required to provide your personal information to the Vanuatu Financial Service Commission and other regulatory and government bodies in Vanuatu and other countries as may be required by law from time to time.

The Company will disclose your personal information, without notice when required to do so by law or in good faith that such action is necessary to:

- a) protect our rights and/or comply with any court order or judicial proceedings;
- b) avoid any potential fraud;
- c) conform to the edicts of the law or comply with a legal process served on the Company or on the Company's website;
- d) protect and defend the rights or property of the Company's website; and
- e) act in urgent circumstances to protect the personal safety of users of the Company, its websites, or the public.

The Company may also disclose your personal data to:

- The Company's Introducing Brokers or any other Group Companies ("Processors"), who process data on behalf of the Company and who may only use it for the same purposes as the Company, subject to the section "Warranties" and "Indemnity" below;

- Companies it hires to provide limited services on our behalf, including packaging, mailing and delivering purchases, postal mail, etc. The Company will ensure that none of your personal information will be disseminated to those companies; the companies will only be subject to the information they need to deliver the service, and they are prohibited from using the information for any other purpose;
- Financial institutions and other similar organizations that it deals with in the course of its corporate activities, or those that are nominated by you;
- External service providers and professional advisers (which may be located overseas) that provide services to the Company;
- Any organization at your request or any persons acting on your behalf, including your financial adviser, broker, solicitor or accountant;
- Any third parties where this is necessary to process a transaction or provide services which you have requested; or
- Any authority to whom the Company is required to disclose such information by law.

### Warranties

The Processors shall ensure that:

- a. the Processor's employees are informed of the confidential nature of the personal information; and
- b. it will process the personal information in compliance with all applicable laws, enactments, regulations, orders, standards and other similar instruments.

### Indemnity

The Processors agree to indemnify and keep indemnified at its own expense the Company against all costs, claims, damages or expenses incurred by the Company or for which the Company may become liable due to any failure by the Processor or its Employees to comply with any of its obligations under this Privacy Policy.

### Statistical Information

The Company may combine your personally identifiable data with information from other users of the website to create impersonalized statistical information. The Company may provide this statistical information to its business partners or third parties. In no circumstances will you be able to be identified from this statistical information; you will remain anonymous.

## **Your Rights**

You are not obligated to provide any of the personal information requested by the Company. In the absence of this information, however, the Company may not be able to open an account for you where the information is requested in on an application form, or to provide you with any other services, information or assistance you have sought.

While the Company may send you marketing material that it thinks may be useful to you, the Company is cognizant of the need to respect your privacy. Unless you are informed otherwise, this information is used to review your ongoing needs, enhance customer service and give you information or opportunities that the Company believes may be relevant to you. If you do not wish to receive non-essential information or marketing material, you will be allowed to unsubscribe from receiving such material.

### Right of Access

Under Electronic Transactions Act [CAP 263] and other protection legislation, as amended or replaced from time to time, you as a natural person have the right to obtain a copy of any personal information which we hold about you and to advise us of any perceived inaccuracy.

To make a request or to inform the Company, you may contact the Company, verifying the identity and specifying the requested information. The Company may charge an administrative fee.

You may inform the Company at any time that your personal details have changed by emailing us at [support@threetrader.com](mailto:support@threetrader.com). The Company will need to verify your identity and may require you to complete a form specifying the information you require. The Company will acknowledge your request within seven (7) days and respond promptly to it advising the procedure to accessing this information.

If you have any questions, complaints or requests, please write to the Company, verifying your identity and setting out in full what information you require. If a complaint is not resolved by the Company to your satisfaction, you may complain to the Information Commissioner.

### **Consent**

By accessing this website, you consent to the Company collecting, maintaining, using and disclosing personal information about you and provided by you or by another person as in accordance with this Privacy Policy.

### **Links to Other Websites**

The website of the Company may provide links to third-party websites for product related services and information. If you decide to access those links, you will leave the Company's website. The Company does not control those third-party websites. Any personal information you choose to give to unrelated third parties is not covered by the Company's Privacy Policy. You should review the privacy policy of any third-party website before submitting personal information. Some third-party companies may choose to share their personal data with the Company. That sharing is governed by the disclosing company's privacy policy.

## **Cookies**

The Company uses cookies to gather information about your access to its website and other services it provides to you. Cookies are small pieces of information which use a unique identification tag and are stored on your device as a result of you using the website or other services it provides to you.

Most internet browsers are set up to accept cookies. If you do not wish to receive cookies, you may be able to change the settings of your browser to refuse all cookies or to have your computer notify you each time a cookie is sent to it, and thereby give yourself the choice whether to accept it or not. However, it is strongly recommended that you allow cookies on the Company's website to ensure you have the best possible experience. Turning off cookies may result in reduced performance of the website and trading platform and may also impair the quality of the services that the Company provides to you in relation to your account.

## **Security**

The Company adopts strong measures to protect the security of your personal information and to ensure it is not accessed by unauthorized persons. Access to personal information is restricted to employees and authorized service providers who need it to perform their work. You must not share or disclose your log in details with any third party.

The Company takes strong precautions to protect your personal information from loss, theft, copying, misuse, unauthorized access or disclosure, alteration, or destruction. Measures include encryption during information transmission, strong authentication mechanisms and separation of machines and data to provide secure areas.

## **Amendments of Policy**

The Company reserves the right to make changes to this Privacy Policy from time to time for any reason. You are responsible for regularly reviewing the Privacy Policy on the website and if you use the website after any such changes are published, such use shall constitute your agreement to such changes.