



**GTCM**  
TRADE WITHOUT LIMITS

**DEPAHO LIMITED**

**PRIVACY POLICY**

## **Scope of the Privacy Policy**

Depaho Ltd operating under the brand name of GTCM ([www.gtcm.com](http://www.gtcm.com)), hereinafter referred to as **'the Company'** respects each individual's right to privacy. The Company values their relationship with clients, and takes great effort in maintaining the privacy and therefore the loyalty of each individual client, by providing the required security. The provisions of this notice apply to former as well as current clients.

## **Personal Information**

In order to provide the clients with the best services, once the client applies to become a Company client, he/she is being asked to provide a number of personal information. This information shall assist in evaluating the financial needs of the client, processing the client's requests and transactions, keeping the client informed about products and services that may be of interest to the client, and providing the client with a better service experience.

## **Required Information May Include**

- **Application Information:** full name, address, birth date, identity, social security number, occupation, assets, and income.
- **Transaction Information:** Information about client's transactions with the Company and/or its affiliates, records of past communications. The later may include: client's trading account balances, trading activity, past inquiries and responses.
- **Verification Information:** This may be required to verify the client's identity, and may include passport and/or driver's license and/or any other additional documentation verifying the identity of the client and which may be asked from Compliance Department. Furthermore, it may be required to verify the residential address and might include a utility bill and/or a Bank statement and/or any other additional documentation which might be asked from Compliance Department.

The Prevention and Suppression of Money Laundering Activities Law of 2007 as this is being amended from time to time, and all relevant Regulations and Directives require financial institutions to collect information and take action, where necessary to verify a client's identity as well as the source of investment.

## **The Use of Cookies**

The Company use a technology called "cookies", which enables it to provide the client with a better experience in using its website by sending small text files from the Company's servers to client's computer. The cookies do not track the client's private information.

If the client does not wish to receive cookies, he/she may be able to change the settings of the browser to refuse all cookies or to have the computer notify him/her each time a cookie is sent to it, and thereby give the choice whether to accept it or not. However, this may impair the quality of the services that are being provided in relation to the trading account.

The Company shall not be liable for misuse or loss of personal information resulting from cookies on site(s) that the Company does not have access to and/or control over.

## **Sharing Information**

### *a. General Policy*

The Company does not disclose any personal information of the clients to third parties, except as described in this present Policy. Third party disclosures may include sharing such information with non-affiliated companies that perform support services for client's trading accounts and/or facilitate transactions with the Company, including those that provide professional, legal, and/or accounting services to the Company. Non-affiliate companies that assist the Company in providing services are required to maintain the confidentiality of such information to the extent they receive it and to use the personal information only in the course of providing such services and only for the purposes dictated by the Company.

The Company may also disclose a client's personal information to a third party in order to fulfil the instructions or pursuant to express consent of the client. The Company declares that no personal information is being or shall be sell to any third party.

### *b. Regulators*

The Company may disclose the client's personal information to third parties as permitted by, or in order to comply with, applicable Laws and Regulations. This may include disclosing personal information in order to cooperate with regulatory authorities and law enforcement agencies, as may be necessary to protect the rights and/or property of the Company.

## **Security**

The Company shall take all necessary measures in order to protect the security of all personal information. The Company shall protect all data from loss, misuse, unauthorised access or disclosure, alteration, or destruction.

The Company shall not be liable for unlawful or unauthorised use of any personal information due to misuse or misplacement of the passwords, negligent or malicious use.

## **Failure to Provide Personal Information**

The clients have a choice to supply any or all of the personal information required. However, missing information may have as a result failure of establishment of a business relationship with the Company due to not compliance with the relevant Laws and Regulations.

## **Opt Out**

In case a client wishes to remove his/her name and/or personal data from the Company's database, he/she is advised to inform the Company in writing by addressing his/her request to [info@depaho.com](mailto:info@depaho.com).

## **Amendments**

Any amendments of the Privacy Policy that affects the personal information of the clients collected on the Company's website shall be disclosed to the clients, within a reasonable time, via electronic mail (e-mail) and/or an announcement on the Company's main website. Clients shall have a choice whether or not to use the relevant



information in a different manner. Any amendments made by the Company that do not affect personal information shall be announced on the Company's main website.

### **Consent**

The client by visiting and/or accessing the Company's website, he/she consent to the Company to collect, maintain and/or use the personal information as per the present Policy.

### **Contact Information**

The Company shall provide the clients with further information regarding the Privacy Policy upon request. The Company welcomes all remarks and the clients are advised to forward their enquiries either via electronic mail (e-mail) to [info@depaho.com](mailto:info@depaho.com) or via phone/facsimile or post to the following contact details:

Depaho Ltd  
Artemisia Business Center  
Second Floor, Office 201  
14 Charalambou Mouskou  
2014, Strovolos  
Nicosia, Cyprus

Telephone: +357 22 300 550  
Fax : +357 22 766 333  
E-Mail: [info@depaho.com](mailto:info@depaho.com)

Nicosia, June, 2013