

PRIVACY & COOKIES POLICY

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1. INTRODUCTION

Depaho Ltd (the “Company”, “we”, “our”, “us”) operating under its brand name GTCM (www.gtcm.com), respects each individual's right to privacy.

The Company values its relationship with existing and potential 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 Privacy & Cookies Policy (the “Policy”) apply to existing and potential clients, as well as to visitors of the Company’s websites that receive the services of the Company through its websites, platform(s) and mobile application(s) (the “Services”).

It is important that you read this Policy together with any other privacy 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 privacy notices. You can download and save a PDF version of the Policy and privacy notices.

Scope of the Privacy & Cookies Policy

This Policy aims to give you information on how the Company collects and processes your personal data through your use of this website, including any data you may provide through the Services when you apply for an account with the Company.

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

Controller

The Company is the controller and responsible for your personal data.

The Company has appointed a Data Protection Officer (DPO) who is responsible for overseeing questions in relation to this Policy and any privacy notice provided to you throughout the Services provided by the Company. If you have any questions about this Policy, including any requests to exercise your legal rights, please contact us using the details set out below.

Changes to the Privacy Notice and Your Duty to Inform Us of Changes

This version was last updated on 11 May 2018 and historic versions can be obtained by contacting us.

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.

2. PERSONAL DATA

In order for the Company to provide you with the best service, once you apply to become a client, you are asked to provide a number of personal data.

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).

Any personal data that is collected by the Company through the provision of the Services shall be processed according to the Processing of Personal Data (Protection of Individuals) Law 2001 (the “Personal Data Law”), as amended or replaced from time to time, and according to the General Data Protection Regulation (EU) 2016/679 (the “GDPR”).

Collection of Personal Data

Collection of personal data shall assist the Company in the provision of its Services and for operational and business purposes, including, inter alia, meeting regulatory obligations, safeguarding a client’s rights, evaluating the service

needs of a client, processing a client's requests and transactions, keeping a client informed about products and services that may be of interest to the client, and providing a client with better service experience.

Personal Data may include:

- **Application Information:** email address, full name, address, birth date, identity, tax registration number, social security number, occupation, assets, and income.
- **Transaction Information:** information about a client's transactions with the Company and/or its affiliates and records of past communication which may include: a client's trading account balances, trading activity, past inquiries and responses.
- **Verification Information:** this will be required to verify a client's account which may include identity and residential verification, e.g. passport, identity card, utility bill, bank statement, and/or any other additional documentation and/or any other documentation which may be asked from the Company's Compliance Department accordingly; all requirements on verification information derive from applicable legislation that requires financial firms to collect information and take action, where necessary, to verify a client's identity.
- **Log Information:** we may log information about your use of the Services, including the type of browser you use, access times, pages viewed, your IP address and the page you visited before navigating to our websites.
- **Financial Information:** if a client will subscribe to the Company's Services, the latter will collect and process certain financial or banking information, and other information necessary for the Company to process a transaction; this information is stored when adding funds to your trading account or receiving funds; this data may be stored with a third part processor.

While ensuring compliance, the Company ensures the protection of personal data, and its lawful and fair processing. The protection of personal data is certain for every individual and is processed in a manner that minimizes risks to confidentiality and integrity of the personal data.

We use different methods to collect data from and about you through the following:

- ✓ Registration process;
- ✓ Provision of the Services;
- ✓ Subscriptions;
- ✓ Competitions, promotions, surveys;
- ✓ Automated technologies interactions, e.g. use of cookies;
- ✓ Third party publicly available sources, e.g. analytics providers such as Google, advertising networks, search information providers;
- ✓ Contact, Financial and Transaction Data from providers of technical, payment and delivery services;
- ✓ Identity and Contact Data from publicly available sources, e.g. government gateways.

Use of Personal Data

The Company may collect, disclose, process and share any your personal data further to regulatory and legal requirements or as per your consent and as described in this present Policy.

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- ✓ Where we need to perform the contract we are about to enter into or have entered into with you.
- ✓ Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- ✓ Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communication to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

The Company uses personal data for the provision of Services and other related purposes:

- ✓ Websites, Platform(s) and Mobile Application(s) use: in order to enable a visitor and/or a client to use the Company's Services, certain personal data is essential to enable the use of the Services and the use of features; certain personal data, e.g. cookies, is needed in order to be able to use the Company's Services.
- ✓ Account setup and administration: Personal data is used in order to enable account registration, administration and operation; the Company may use Personal data provided for the purpose of, inter alia, sending alerts, emails, or SMS, for you to view on the status of your trading account, e.g. verification of account or margin call or other information.
- ✓ Marketing material: to deliver marketing and news notifications across its clients via the Services. Such personal data include, inter alia, email address, telephone numbers, text messaging (SMS), platform pop-ups and push notifications through the Services; marketing material will include information on how to opt out from receiving such material and a user is able to manage his information and marketing preferences; the Company may still proceed to distribute important information through the Services, required from time to time as per applicable regulations relating to trading account details and subscriptions.
- ✓ Researching and development: to enable internal research and development purposes so as to develop the Services; in addition, through surveys that a client can choose to complete or not.
- ✓ Social Networking: some of the Services may include social networking features, advertising and interactive programs that a client will choose to use from time to time.
- ✓ Record keeping: due to regulatory requirements, the Company is obliged to maintain records in order to meet its legal obligations; any information stored is controlled and managed by the Company under strict security measures.
- ✓ Legal obligations: to meet certain legal and regulatory obligations, the Company retains personal data which it uses and processes for compliance reasons which include, inter alia, identification of clients or prevention, detection, investigation of a crime; the Company may use personal data of its clients, which include inter alia identification documents, telephone recordings, financial information etc., in order to meet internal and external audit requirements, information security purposes and as the Company considers to be necessary, under applicable legislation, regulatory requests, resolution of disputes, governmental and public authorities' requests, enforcement of terms and conditions and protection of fundamental rights.

The Company may also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal data but is not considered 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 privacy notice.

The Company processes and distributes, i.e. shares or discloses, personal data where necessary to provide its Services or conduct its business operations as described below.

a. Regulators

The Company may disclose the client's personal data to governmental and public authorities as required and 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.

b. Internal

The Company may process and distribute personal data internally in order to conduct its business operations, always in line with its internal privacy policies and procedures. In addition, the Company may distribute information to its intra-group related businesses (within or outside the EEA) if necessary for the provision of the Services, e.g. account administration, customer and technical support, sales and marketing. All of the employees of the Company and related companies are bound to follow the Company's personal data privacy policies and procedures when processing such personal data.

c. Third Parties

Third party disclosures may include sharing such personal data with third party companies that provide services to the Company, which include, inter alia, administration and customer support services for clients' trading accounts and/or facilitate transactions with the Company and/or perform identity and credit checks, including those that provide professional, legal, marketing and/or accounting services to the Company and/or service providers or tied agents acting on behalf of the Company which may perform identity and credit checks.

Third Party companies that assist the Company in providing services are required to maintain the confidentiality of such data to the extent they receive it and to use the personal data only in the course of providing such services and only for the purposes dictated by the Company. The Company's Third Party providers are not permitted to share or use personal data the Company distributes to them for any other purpose than their contractual obligation with the Company.

Third Party Links

Our Services contain links to websites operated by Third Parties. The Company provides these links for your convenience, but it does not review, control or monitor the privacy or other practices of websites operated by Third Parties. The Company is not responsible for the performance of websites operated by Third Parties or for your business dealings with them.

Change of Purpose

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, only where this is required or permitted by law.

International Transfers

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

- ✓ We will only transfer your personal data to countries that have been deemed by the European Commission to provide an adequate level of protection for personal data.
- ✓ Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- ✓ Where we use providers based in the United States, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the United States or have signed binding corporate rules.

Please contact us for further information on the specific mechanism used by us when transferring your personal data out of the EEA.

Storage of Personal Data

We will retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

- a. Encryption: Personal data which is stored in an electronic format on all computers, including laptops and external hard discs, are securely controlled by password protection and are encrypted; restrictions for the accessing of personal data are also applied for each department accordingly.
- b. Soft Copy: Personal data is electronically stored in an encrypted format both locally and by using data centre/ colocation service providers in certain locations, within and outside the EU:
 - Cyprus: The server is housed at the Company's headquarters.
 - United States of America: The server is housed in New York, with a registered company acting as a data centre / colocation service provider.
 - Bulgaria: The server is housed in Sofia, with a registered company acting as a colocation service provider.
 - Holland: The server is housed in Amsterdam, with a registered company acting as a colocation service provider.

- c. **Hard Copy:** Hard copies of personal data may be stored at the offices of the Company; the Company takes steps to ensure that the information collected is stored according to the requirements of applicable laws where personal data is located; the Company also maintains strict physical security for the premises and secure areas for storing personal and sensitive data.
- d. **Communication:** all telephone conversations and/or electronic communication between the Company and the client, as well as all telephone conversations and/or electronic communication that result or may result in transactions or client order services, are being recorded.

The Company is obliged by applicable laws and regulations to store personal data of its clients for a period of at least five (5) years after termination of the business relationship with a client.

Upon request by its regulator, the Company shall be obliged to maintain personal data records for a period of up to seven (7) years. In addition, the Company might be obliged to maintain records for a longer period of time, where necessary, due to any governmental and/or court orders in order to protect its rights.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you. When personal data is no longer needed, the Company securely deletes and/or destroys it. Please contact us for further information.

3. COOKIES POLICY

Cookies

Cookies are a kind of short-term memory which is stored in a visitor's and/or client's browser and enables Services to 'remember' little bits of information between pages or visits. Some of the purposes of installation of Cookies or similar applications may also require the separate consent from you.

Use of Cookies

Use of cookies and other tracking technologies are standard across the Services through which personal data is collected. You can control and manage the use of cookies through the Services and more information is provided below.

The Company uses cookies to enable it to provide you with a better experience in using our Services. If you do not wish to receive cookies, you may be able to change the settings of the browser or mobile device to refuse all cookies or to receive notification each time a cookie is sent, thereby giving 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 data resulting from cookies for Services that the Company does not have access to and/or control over.

Consent to Cookies

Consent to our cookie policy is obtained through the cookie permission settings in your internet browser or mobile device and throughout your acceptance for the use of the Company's Services. If you do not wish to receive cookies, you can change the settings of the internet browser or mobile device to refuse all cookies or contact us.

Types of Cookies

There are various types of cookies needed to be used in order to enable the provision of the Services, which include, inter alia, absolutely necessary cookies essential to enable navigation through the Services, performance cookies which are used to improve use of the Services, functionality cookies which are used to remember changes in choices a User requested and marketing cookies used to evaluate performance of advertisements and visits on the Services.

Technical Cookies and Cookies serving aggregated statistical purposes

Activity strictly necessary for the functioning of the service: Use of cookies to save your session and to carry out other activities that are strictly necessary for the operation of the same, for example in relation to the distribution of traffic.

Activity regarding the saving of preferences, optimization and statistics: Use of cookies to save browsing preferences and to optimize your browsing experience; among these cookies are, for example, those to set the language and the currency or for the management of first party statistics employed directly by the owner of the site.

Other types of Cookies or third-party tools

Some of the services listed below collect statistics in aggregated form and may not require your consent or may be managed directly by you – depending on how they are described – without the help of third parties.

If any third-party-operated services are listed among the tools below, these may be used to track your browsing habits, in addition to the information specified herein and without the owner's knowledge.

Interaction with external social networks and platforms: These services allow interaction with social networks or other external platforms directly from the pages of the Services; the interaction and information obtained are always subject to your privacy settings for each social network; if a service enabling interaction with social networks is installed it may still collect traffic data for the pages where the service is installed, even when you do not use it.

Google +1 button and social widgets (Google Inc.): The Google button and social widgets are services allowing interaction with the Google+ social network, provided by Google, Inc.

Personal data collected: Cookie and Usage data.

Place of processing: USA

Facebook Like button and social widgets (Facebook, Inc.): The Facebook Like button and social widgets are services allowing interaction with the Facebook social network, provided by Facebook, Inc.

Personal data collected: Cookie and Usage data.

Place of processing: USA

Tweet button and social widgets (Twitter, Inc.): The Tweet button and social widgets are services allowing interaction with the Twitter social network, provided by Twitter, Inc.

Personal data collected: Cookie and Usage data.

Place of processing: USA

Linkedin button and social widgets (LinkedIn Corporation): The LinkedIn button and social widgets are services allowing interaction with the LinkedIn social network, provided by LinkedIn Corporation.

Personal data collected: Cookie and Usage data.

Place of processing: USA

YouTube button and social widgets (YouTube Corporation): The YouTube button, video and social widgets are services allowing interaction with the Youtube social network, provided by YouTube, LLC.

Personal data collected: Cookie and Usage data.

Place of processing: USA

Statistics

The services contained in this section are used to monitor and analyse traffic data and are used to keep track of your behaviour.

Google Analytics with anonymized IP (Google Inc.): Google Analytics is a web analytics service provided by Google Inc. Google uses personal data collected for the purpose of evaluating the use of this application, compile reports and share them with other services developed by Google. Google may use this personal information to contextualize and personalize the ads of its own advertising network.

This integration of Google Analytics makes anonymous your IP address. The anonymization shortening work within the confines of the EU Member States or other countries participating in the agreement on the European Economic Area, the IP address of the Users. Only in exceptional cases, the IP address will be sent to Google's servers and statements within the United States.

Personal data collected: Cookie and Usage data.

Place of treatment: USA

Displaying content from external platforms

The Services allow you to view content hosted on external platforms directly from the pages of the Services and interact with them. If a service of this kind is installed, it may still collect web traffic data for the pages where the service is installed, even when users do not use it.

Google Maps Widget (Google Inc.): Google Analytics is a web analytics service provided by Google Inc. Google uses Personal Information collected for the purpose of evaluating the use of this application, compile reports and share them with other services developed by Google. Google may use this personal information to contextualize and personalize the ads of its own advertising network. This integration of Google Analytics makes anonymous your IP address. The anonymization shortening work within the confines of the EU Member States or other countries participating in the agreement on the European Economic Area, the IP address of the Users. Only in exceptional cases, the IP address will be sent to Google's servers and statements within the United States.

Personal data collected: Cookie and Usage data.

Place of treatment: Google Maps - USA

How can you manage the installation of Cookies?

You can control and/or delete cookies as you wish directly from within your own internet browser or mobile device and prevent – for example – third parties from installing them. You can delete all cookies that are already on your computer and you can set most browsers to prevent them from being placed. If you do this, however, you may have to manually adjust some preferences every time you visit a site and some services and functionalities may not work. It is important to note that by disabling all Cookies, the functioning of the Services may be compromised. For further information about cookies and how to disable them, please refer to www.allaboutcookies.org.

4. SECURITY

Personal data is processed in a manner that ensures appropriate security and confidentiality, including preventing unauthorised access to or use of personal data. 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.

The Company maintains policies and procedures and has measures in place in order to ensure high levels of protection of personal data which include, inter alia, appropriate restrictions on permissions of access to personal information, controls and monitoring of storing and distribution of data as well as Data Protection Impact Assessments.

All employees and providers of the Company are required to follow certain privacy and security policies and procedures. The Company is not responsible for the security and privacy of any Third Party and/or Social Networking services or any information collected by them. It is recommended that a User should always review the said providers' privacy policies.

Failure to Provide Personal Information

You have a choice to supply any or all of the personal data 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.

5. AMENDMENTS

Please read this Policy carefully and contact us in case you have any questions about our privacy practices or your personal information choices. We reserve the right to amend this Policy at any time by posting the new version. It is important that you check back for updates to this Policy. If we make changes we consider to be important, we will let you know by placing a notice on the relevant Services.

6. CONSENT

A User by visiting and/or accessing the Company's website will be required to consent to the present Policy for the collection, maintenance and/or use the personal data as per the present Policy.

7. RIGHTS

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

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it. The Company hereby reserves its right to charge a relevant fee for providing such record of personal data to a client, except where this is not allowed under local legislation.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

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 (see below), 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.

Request 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.

Withdraw consent at any time 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 or that is needed further to regulatory or legal requirements. 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.

8. CONTACT US

For any questions or clarifications, or to file a complaint, please contact our Data Protection Officer. You also have the right to withdraw your consent to use your personal data in the future, in whole or in parts, or request deletion of your personal data.

Contact Information of Data Protection Officer

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