

PRIVACY & SECURITY POLICY



Your privacy is important to us

TCT understands the importance of keeping your data safe and has taken steps to ensure that we protect it.

Our Fair Processing Notices set out how we collect, use and hold data of the people that we interact with. Please read these carefully to understand our views and practices regarding your personal data and how we treat it.

Should you wish to know more in relation to TCT's data protection and information security practices, [contact us](#).

This is the Privacy & Security Statement and Policy ("Privacy Statement") for TCT The Commodity Traders, B.V. and its affiliates ("TCT") ("TCT-GRC"). This Privacy & Security Policy was last updated on 23rd May, 2022.

TCT understands that your privacy is important. TCT is committed to protecting your privacy and personal information you provide or as you access and use materials on TheCommodityTraders.com (the "Site"), including the Site subscription pages or other websites or apps that post a link to this Privacy & Security Statement. In addition, information that you submit to TCT in response to an email request for information or other outreach from TCT, will be treated in accordance with this Privacy & Security Statement.

TCT may, in its discretion, amend this Privacy & Security Statement from time to time. To ensure you are able to remain informed about the information we collect and how we use it, material changes to our statement will be reflected here. This Site may contain links to external sites which are not governed by this Privacy & Security Statement. TCT does not take responsibility for the privacy practices of any third party sites to which we link. We encourage you to review the Privacy & Security policies of any such sites before you submit information there.

Your Acceptance of This Privacy & Security Statement

Please read this Privacy & Security Statement carefully. By browsing our website and expressly consenting where required (for instance, when submitting your application), you agree to be bound by this Privacy & Security Statement.

Information That We Collect, and How We Use It

What information do we collect?

TCT collects information from you when you create your account for the Site, request copies of publications, subscribe for email newsletters and press releases, seek additional information regarding our services. If you do not provide such information, you will not be able to create an account for the Site, request copies of publications, subscribe for email newsletters and press releases, seek additional information regarding our services.

Personal information that we collect includes: names, e-mail addresses, phone numbers, unique personal identifiers, financial information, subject areas of interest and/or demographic information.

How do we use personal information?

The purposes and uses of your personal information will depend on the use of the Site and the personal information provided. We process your personal information:

(i) for the purposes of safeguarding the legitimate interests pursued by TCT. This includes:

- Informing you about updates to the service and notifying you about other products and services offered by TCT that may be of interest to you,
- Tailoring your experience at the Site with relevant TCT materials
- Improving our web content and navigation.

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(ii) on the basis of your consent. Insofar as you have granted us consent to the processing of personal information for specific purposes (for example, registering your KYC Application Form with TCT), the lawfulness of such processing is based on your consent. You may withdraw your consent at any time.

(iii) for compliance with a legal obligation. This includes anti-fraud and anti-money laundering measures as well as tax and social security requirements.

We will not sell, share, or rent or otherwise make available your personal information to other parties, except that we may disclose the information to third parties who perform services on our behalf and have a need to access the information in connection with those services. Any third parties will only process this information to the extent to which and within the limits that TCT itself is permitted to process that data. In addition, TCT may disclose your contact information in response to inquiries by bona-fide rights owners in connection with allegations of infringement of copyright or other proprietary rights arising from information that you have posted on the Site or otherwise provided to TCT.

How We Might Share Your Information

When does TCT disclose my personal information?

The third parties with whom we may need to share personal information to help us provide services and products to you and to run our Website include:

- our advisors;
- our service providers including without limitation professional advisers or consultants such as lawyers, bankers, auditors, accountants and insurers providing consultancy, legal, banking, audit, accounting or insurance services, financial institutions providing finance to us, external auditors, product content providers, business partners and any organization that arranges your access to our products or

services (if that is not you).

- law enforcement bodies in order to comply with any legal obligation or court order

Because TCT is a global organization we need to transfer personal information which is collected on the Site or through other means to help operate our business efficiently. This also includes third parties located in different countries around the world, including outside of the EEA. These arrangements may involve your personal information being located in various countries around the world e.g. USA where privacy laws differ. We only make these arrangements or transfers where we are satisfied that adequate levels of protection are in place to protect information held in that country. In addition, the Site may be viewed and accessed anywhere in the world including countries that may not have laws regulating the use and transfer of personally identifiable information. By using the Site, submitting information through this site, or submitting personal information to TCT through other means you voluntarily consent to such international transfer and hosting of such information to those countries and parties.

We encourage you to use caution when publicly disclosing your personal information.

Data Retention

How long does TCT retain personal information?

Our applicable information governance policies, procedures and standards require that personal information be retained for as long as we have an ongoing legitimate business need to do so (for example, to provide you with a Service you have requested, or to comply with applicable legal, tax or accounting requirements).

Once we no longer have a legitimate business need to process your personal information, our applicable information governance policies, procedures and standards require that we either delete or anonymize your personal information, or if deletion or anonymization is not possible, then pseudonymize and/or

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securely store your personal information and isolate it from any further processing until deletion is possible.

No Offer, No Obligation

No information published on the TCT website constitutes a solicitation or offer, or recommendation, to engage in any investment activity, to effect any transactions, or to conclude any legal act of any kind whatsoever. The information published and opinions expressed are provided by TCT for personal use and for information purposes only and are subject to change without notice. TCT makes no representation or warranties of any kind (either express or implied) that the information and opinions expressed on the TCT website are accurate, complete or up to date.

Cookies and Other Tracking Technologies

How does TCT use cookies and similar tracking technology?

TCT may use cookies on this Site and in our communications with you to keep track of your visit to our Site and our communications with you. A “cookie” is a small amount of data sent from a Web server to your browser and stored on your computer’s hard drive. With most internet browsers, you can erase cookies from your computer hard drive, block all cookies, or receive a warning before a cookie is stored on your computer.

Please view our [Cookie Policy](#) for information on how TCT website use cookies.

Data Security

We undertake to take all reasonable steps to prevent your Data from being seen by third parties. We will only disclose your Data to other third parties if required to do so for legal or regulatory purposes.

Links To Other Sites

TCT is not responsible for the privacy practices or the content of any non-TCT web sites to which we link from the Site. We are not responsible for the protection and privacy of any information you provide whilst visiting other websites and sites not governed by our Privacy & Security Policy. We cannot control the content or security of such websites. We cannot be held responsible for any loss or damage incurred by a user as a result of visiting such websites. No links are intended to be, nor should be construed as, an endorsement of any kind by us of that other website.

Your Data Protection Rights

What are your data protection rights?

No information published on the TCT website constitutes a solicitation or offer, or recommendation, to engage in any investment activity, to effect any transaction, or to conclude any legal act of any kind whatsoever.

Site Policies, Modifications, and Severability

What happens when the Corporate Privacy & Security Policy is updated?

We reserve the right, at our sole discretion, to modify or replace this Privacy & Security Policy at any time. If a revision is material, we will try to provide at least 30 days’ notice to any new Privacy & Security Policy taking effect. What constitutes a material change will be determined at our sole discretion.