

# Privacy Policy

Protecting the privacy and safeguarding the personal and financial information of our clients and website visitors is one of our highest priorities. The following Privacy Statement explains how Direct Trading Technologies collects and protects your personal information. References to "Direct Trading Technologies" in this Privacy Statement include all Direct Trading Technologies companies and divisions.

By opening a Direct Trading Technologies account or by using Direct Trading Technologies websites, you give your consent to the collection and use of personal information by Direct Trading Technologies as explained in this Privacy Statement.

## Collection of personal information

We collect your personal information directly from you and indirectly as a result of your relationship with us. Direct Trading Technologies may use the information collected from you to verify your identity and contact information, establish your trading account, issue you an account number and a secure password, maintain your account activity and contact you with account information, among other reasons. This information also helps us improve our services to you, customize your browsing experience and inform you about additional products, services or promotions that may be of interest to you.

You directly provide us with the majority of information we collect. This information includes your contact details, including name, mailing address, telephone number and e-mail address, personal identification data we are required by law to collect, including your passport number and/or tax identification number, and information required by law to assess your trading experience and risk tolerance, including your annual income, net worth and available risk capital. We also collect demographic information when you open an account, including gender, birth date, occupation and employment status.

You provide us with this information by completing the account application and related documentation, by sending us an e-mail or by submitting information in response to a promotion or special offer.

The information we collect indirectly from you includes your Internet protocol ("IP") address, browser type, operating system, Internet service provider (ISP), time stamps and transaction history.

Should you close your account with us, Direct Trading Technologies will retain your information, but only use it to comply with regulatory requirements and to periodically contact you to offer you the opportunity to reactivate your account or participate in other offers.

## **Cookies**

We use cookies and web beacons (also known as action tags or single-pixel gifs), and other technologies (collectively, "cookies") to provide us with data we can use to improve your experience and to know you better. Cookies are small text files sent from Web servers that may be stored on your computer. Cookies enable us to capture how you arrived at our site, when you return, which pages on our site you visit, and to recognize that you are already logged on when we receive a page request from your browser. We may link the information we store in cookies to personally identifiable information you submit while on our site. We will never share this information with any 3rd party. Cookies are readable only by us and do not contain any personal information nor do they contain account or password information. We cannot and will not gather information about other sites you may have visited.

We may share usage information about visitors to our websites with reputable advertising companies for the purpose of targeting our Internet banner advertisements. The information collected by the advertising company through the use of these pixel tags is not personally identifiable. We may also use 3rd party software to track and analyze usage and volume statistical information including page requests, form requests and click paths. The third party may use cookies to track behavior and may set cookies on behalf of Direct Trading Technologies.

All web browsers have settings that allow you to block cookies. By visiting our website with your browser set to allow cookies, you consent to our use of cookies as described above. If you choose to block cookies, you may use our services but some functions may not work as designed.

## **Sharing Personal Information with Direct Trading Technologies affiliates and Non-affiliated third parties**

Direct Trading Technologies does not sell, license, lease or otherwise disclose your personal information to any affiliate or third party for any reason, except as described below.

Direct Trading Technologies may share information with affiliates if the information is required to provide the product or service you have requested or to provide you the opportunity to participate in the products or services our affiliates offer.

To help us improve our services to you, we may engage another business to help us carry out certain internal functions, such as account processing, fulfillment, client service, client satisfaction surveys or other data collection activities relevant to our business. We may also provide a non-affiliated third party with client information from our database, including your name, address, phone number, and/or e-mail address, to help us analyze and identify client needs, notify clients of product and service offerings or conduct general marketing and market research for us.

Direct Trading Technologies also forges partnerships and alliances with non-affiliated third parties which offer high-quality products and services that might be of value to our clients. In



order to ensure that these products and services meet your needs and are delivered in a manner that is useful and relevant, Direct Trading Technologies may share some personal information with these non-affiliated third parties.

We generally require that all non-affiliated third parties to which we provide your nonpublic personal information agree to keep your information confidential and use such information solely for the limited purpose for which we have engaged them, or as otherwise required by law. In addition, where offers are made to you by non-affiliated third parties, we generally require that they disclose that the offer is being extended because of your relationship with us. We also seek to ensure that these non-affiliated third parties maintain appropriate data security procedures to guard against unauthorized use of, or access to, your personal information.

When required by law, Direct Trading Technologies reserves the right to disclose your personal information to third parties or regulatory, law enforcement or other government authorities. We may also disclose your information to credit reporting or collection agencies, or when necessary to protect our rights or property.

If at any time you choose to purchase a product or service offered by another company, for example by clicking on an advertisement on a website owned or controlled by Direct Trading Technologies, any personal information you share with that company will no longer be controlled under our Privacy Statement. We are not responsible for the privacy policies or the content of sites we link to and we have no control over the use or protection of information provided by you to, or collected by, those websites. Whenever you elect to link to a co-branded website or to a linked website, you may be asked to provide registration or other information. Please note that the information you are providing is going to a third party, and you should familiarize yourself with the privacy policy published by that third party.

### **The security of your personal information**

We employ security software, systems and procedures to offer you a safe and secure trading environment and to protect your personal, financial and trading information.

When you open an account with us, you are issued a unique account number, User ID and a password. Only a limited number of Direct Trading Technologies employees who have a need to know this information will have access to your account number, User ID, and password. Remember that you are ultimately responsible for maintaining the secrecy of your account number, user ID and password. We strongly recommend that you do not disclose this information to anyone.

On our websites and online account application we use technology to encrypt information transmitted by or to you. We use certificate authority (CA) certificates to authenticate our websites and secure trading and customer-facing applications, allowing you to verify that you are connected to our websites.

### **Changes to this Privacy Statement and Opting Out**

In the event Direct Trading Technologies materially changes this Privacy Statement, the revised Privacy Statement will promptly be posted to our websites. By opening an account with



us, you are deemed to agree to accept posting of a revised Privacy Statement electronically on our website as actual notice to you.

Under certain circumstances, such as with respect to our sharing of your personal information with non-affiliated third parties, you may inform us that you would like to "opt out" by contacting us through the contact information listed below. Note that for joint accounts, an-opt out election made by one account owner of a joint account is applicable to all account owners of the joint account. An opt-out election must be made for each separate account you hold at Direct Trading Technologies.

Any dispute over our Privacy Statement is subject to this notice and the Direct Trading Technologies Customer Agreement. If you have any questions that this Privacy Statement does not address, please contact a Client Services representative.

You may contact Direct Trading Technologies for any reason under this Privacy Statement, or otherwise, as follows:

**International:** +44 20 3059 7765

**Email:** [admin@dttvanuatu.com](mailto:admin@dttvanuatu.com)

**Postal:**

Direct Trading Technologies  
Govant Building, BP 1276,  
Port Villa, Vanuatu

## **SUPPLEMENTAL PRIVACY POLICY (EU CLIENTS)**

### **Who we are**

Direct Trading Technologies (“we”, “us”, “our”) is committed to protecting your privacy and maintaining the security of any personal information that we receive from you.

This privacy policy is supplemental to the Privacy Policy (All Clients) above, and applies to individuals who are resident in the European Union. In the event of any conflict between this policy and our existing privacy policy, the terms of this policy shall prevail.

If either privacy policy changes, we will place an updated version on our website.

### **The purpose of this policy**

The purpose of this policy is to explain to you what personal information we collect and how we and our associated companies may use it. Companies are associated with us if they are our subsidiaries or we are both subsidiaries of the same corporate entity.

We are the controller of any personal information which you provide to us which means that we decide the purposes and means of the processing of that personal information.

If any provision or part-provision of this policy is or becomes invalid, illegal or unenforceable, it shall be deemed deleted, but that shall not affect the validity and enforceability of the rest of this policy.

### **How we obtain and store your information**

We obtain your information through applications, emails, letters, telephone calls, SMS messages, cookies and conversations when registering for our services and during the course of our relationship (including information gained when you use our learning tools, demo accounts and trading simulators).

We may monitor or record phone calls with you and monitor (and maintain a record of) all emails and electronic communications sent by or to us.

We follow strict security procedures in the storage and disclosure of information that you have given us to prevent unauthorized access.

### **What types of personal information we process?**

We may process the following types of personal information:

- name;
- contact details including email details, addresses and phone numbers;
- age or date of birth;
- gender;
- occupation;
- income, assets and liabilities;
- bank account balances, financial statements, credit reporting information and employment details;
- trading knowledge and experience;
- user names and passwords;
- information relating to your account including your account history, activity and orders;
- IP address;
- social security number, national insurance number, passport or other MiFIR national identifier;
- transaction reporting reference;
- power of attorney / agent details;
- phone device type;
- operating system;
- device ID;
- cookie ID;
- Google 360 ID;
- GUID; and
- information about your use of our services, products and facilities (including information gained when you use our learning tools, demo accounts and trading simulators).

## **How we check your identity**

To comply with applicable regulations, we need to confirm the name and address of our customers and certain third parties. We may ask you to provide physical forms of identity verification when you open your account. Alternatively, we may use a credit reference agency to verify your identity. Our search is not seen or used by lenders to assess your ability to obtain credit.

## **Using your personal information**

As well as checking your identity, the personal information we hold may be used for:

- considering any of your applications;
- carrying out risk assessments;
- complying with our legal and regulatory obligations;
- performing our obligations under any contract we have with you;
- administering our relationship with you including resolving queries or issues;
- establishing and managing your account;
- reviewing your ongoing needs;
- providing you with the information, products and services that you request from us;
- checking your instructions to us;
- investigating any complaint, you may make;
- providing evidence in any dispute or anticipated dispute between you and us;
- recovering amounts payable;
- training our staff;
- enhancing our customer service and products;
- undertaking product development and analysis; and
- detecting or preventing fraud or other crimes.

Where you have consented to direct marketing, we may send you marketing material from time to time by post, email, telephone, SMS or other electronic messaging services.

We also use technology to make decisions automatically or to build profiles about you. This technology uses logic that assesses whether our products are suitable for a potential customer, which helps us to determine whether or not it is appropriate for a potential customer to open an account with us. This means that you may not be able to open an account with us if our technology determines that it would not be appropriate for you to do so based on your financial knowledge and trading experience. If you ever think our machines have got it wrong, you can ask for a human to look into it. (See “Your Rights - Rights in relation to automated decision making and profiling”.)

## **When we may share your information**

We may share your personal information with:

- any regulatory, law enforcement or tax authority;

- such third parties as we reasonably consider necessary in order to prevent crime, e.g. the police;
- our associated companies;
- third-party service providers and advisers who provide us with administrative, financial, research or other services in connection with the services we provide to you;
- our introducing brokers and other commercial partners;
- our professional advisers;
- credit reference agencies;
- our auditors for the purposes of carrying out financial and regulatory audits;
- our agents, including credit reference agencies, acting on our behalf, carrying out such credit and identity checks, including money laundering checks, compliance regulatory reporting and fraud prevention checks, as we may reasonably consider necessary or desirable, including requesting a reference from your bank or any credit reference agency. Any third party referred to in this clause may share any personal information concerning you with us and other organizations involved in credit reference, the prevention of fraud and/or crime and/or money laundering or for similar purposes or to recover debts involved;
- courts, tribunals, regulatory or tax authorities and government agencies to enable us to enforce our agreement with you or to comply with the requirements of a court, regulator, tax authority or government agency;
- the purchaser or potential purchaser of one or more of our businesses or product/service lines and their professional advisers; and
- our trade repository.

Please also note that disclosure to the trade repository or regulators may also result in certain anonymous transaction and pricing data becoming available to the public.

Generally, we require that organizations outside our associated companies with whom we share your personal information acknowledge the confidentiality of your data and undertake to respect your right to privacy.

### **Information, which we obtain indirectly**

In some cases, we are also provided with your name and contact details by our third party referrers.

We also gather information relating to you and your online behavior:

- to help optimize our website, to give you a good user experience and to personalize your use and our communications to you;
- to help us monitor, support and improve the performance of our site (by analyzing your use and experience of our site);
- to help us understand more about you and the products and services you use and are interested in; and
- to tailor the online advertising, you receive.

Knowing more about you helps us to understand our customers better, and means we can give you recommendations about products and services you may be interested in, and provide you with relevant advertising and customized communications that are of interest to you.

We combine information that you provide to us with information that is publicly available and/or that we receive from third parties such as advertisers and/or other reputable sources who have obtained your permission to do so, or have otherwise explained to you that this may happen.

### **Joint applicants**

You should only give us personal information about someone else (such as a joint applicant) with their permission. Where information is provided by you about someone else, or someone discloses information about you, it may be added to any personal information that is already held by us and it will be used in the ways described in this privacy notice. Sometimes, when you open a joint account or product, this may mean that your personal information will be shared with the other applicant. For example, transactions made by you will be seen by your joint account holder and vice versa.

### **The legal basis for our processing of personal information**

The legal basis for our processing of personal information will depend on why we process your information.

Where you wish to enter into or have signed a contract to receive services from us, we will process your personal information to enable us to enter into and perform our contract with you. If you don't provide the personal information requested, then we may not be able to provide some or all of those services to you.

Where you use our website, we will process your personal information collected by using cookies.

We may also need to process your personal information to comply with our legal and regulatory obligations including in relation to:

- performing anti-money laundering, terrorism prevention and sanctions screening checks, complaints and investigations or litigation;
- obtaining information about your relevant investment knowledge and experience so that we can assess whether a service is appropriate for you;
- obtaining information about your other investment activities in order to ascertain your status for the purposes of regulations which apply to trading in over-the-counter derivatives; and
- submitting and disclosing reportable data to our trade repository.

We also have a legitimate interest to process your personal information for:

- performing the services or supplying the products or information you have agreed to receive from us;

- ongoing management of our relationship with you and to maintain contact with you;
- our internal business purposes which may include business and disaster recovery, document retention/storage, IT service continuity (e.g. back-ups and helpdesk assistance) to ensure the quality of the services we provide to you;
- corporate transactions;
- marketing analytics including marketing campaign optimization and web analytics to enable us to develop and target the marketing of our products and services;
- keeping our records updated and studying how customers use our products/services;
- developing our products and services, growing our business and informing our marketing strategy;
- defining the types of customers for our products and services and keeping our website(s) and platform(s) updated and relevant; and
- portfolio analysis and experience studies to enable us to improve the products and services we offer to customers.

If you have consented to direct marketing, we will use relevant personal information to enable us to provide you with personal information about products, news and services that may be of interest to you.

### **Using companies to process your information outside the EEA**

All countries in the European Economic Area (“EEA”) have similar standards of legal protection for your personal information. The personal information that we collect from you may be transferred, and stored, outside the EEA. It may also be processed by staff operating outside the EEA who work for us. Such staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. Where we transfer personal information or share it with others outside the EEA, we will ensure that a similar degree of protection is afforded to it by use of model clauses approved by the European Commission, by transferring to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission or by transferring to third parties who are part of the Privacy Shield.

### **How long will we keep it?**

We shall hold information about you on electronic and/or paper files whilst you are a customer and for at least six years after you cease to be a customer.

### **How to get more help?**

If you have questions, please contact us:

**International:** +44 20 3059 7765

**Email:** [admin@dttvanuatu.com](mailto:admin@dttvanuatu.com)

**Postal:**

Direct Trading Technologies  
Govant Building, BP 1276,  
Port Villa, Vanuatu



If you are unhappy about any aspect of the way we collect, share or use your personal information, we would like you to tell us.

## **YOUR PRIVACY RIGHTS**

This section explains your rights in relation to your personal information in more detail. The various rights are not absolute and are subject to certain exceptions or qualifications.

You are entitled to receive personal information free of charge except in the following circumstances where we may charge a reasonable fee to cover our administrative costs of providing the personal information for:

- manifestly unfounded or excessive/repeated requests, or
- further copies of the same information.

Alternatively, we may be entitled to refuse to act on the request.

Please consider your request responsibly before submitting it. We'll respond as soon as we can. Generally, this will be within one month from when we receive your request but, if the request is going to take longer to deal with, we'll let you know.

In order to exercise any of the rights described below please contact us:

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**Email:** [admin@dttvanuatu.com](mailto:admin@dttvanuatu.com)

**Postal:**

Direct Trading Technologies

Govant Building, BP 1276,

Port Villa, Vanuatu

## **Accessing your information**

### **When can you request access?**

You have the right to:

- confirmation that your personal information is being processed
- access to your information, and
- other certain information (most of which should be in our privacy policy anyway).

You can request copies of paper and electric records about you that we hold, share or use. To deal with your request, we can request proof of identity and enough personal information to enable us to locate the personal information you request.

### **When will access not be provided?**

We can only provide you with *your information*, not personal information about another person. Also, where access would adversely affect another person's rights, we're not required

to provide this. Due to legal privilege, we may not be able to show you anything that we learned in connection with a claim or legal proceeding.

Please clearly set out in your access request the personal information that you're requesting. If this is not clear, we may come back to you to ask for further personal information by way of clarification.

### **Correcting your information**

You have the right to obtain from us without undue delay the rectification of inaccurate personal information concerning you. If you tell us that the personal information we hold on you is incorrect, we will review it and if we agree with you, we will correct our records. If we do not agree with you, we will let you know. If you wish, you can tell us in writing that you believe our records still to be incorrect and we will include your statement when we give your personal information to anyone outside the Direct Trading Technologies group of companies. You can contact us using the details in the section above in the main body of the privacy notice headed 'Obtaining further personal information from us'.

You may also have the right to have incomplete personal information completed, including by means of providing a supplementary statement. Whether or not this is appropriate in any particular case depending on the purposes for which your personal information is being processed.

We need to notify any third parties with whom we've shared your personal information that you've made a rectification request. We'll take reasonable steps to do this, but if it is not possible or may involve disproportionate effort we may not be able to do this or ensure they rectify the personal information they hold.

### **How you can see and correct your information**

Generally, we will let you see the personal information that we hold about you, or take steps to correct any inaccurate information, if you ask us in writing.

Due to legal privilege, we may not be able to show you anything that we learned in connection with a claim or legal proceeding.

### **Erasing your information**

#### **When can you request erasure?**

You have a right to have your personal information erased, and to prevent processing, where:

- the personal information is no longer necessary for the purpose it was originally collected/processed;
- you withdraw consent (where previously provided);
- you object to the processing and our legitimate interests in being able to keep processing your personal information don't take priority;
- we've been processing your personal information in breach of data protection laws; or

- the personal information has to be erased in order to comply with a legal obligation.

**When can we refuse erasure requests?**

The right to erasure does not apply where we are required to retain it for legal or regulatory purposes or where your information is processed for certain specified reasons, including for the exercise or defense of legal claims.

More importantly, if we have to erase your data we may not be able to provide you with our services.

**Do we have to tell other recipients of your personal information about your erasure request?**

Where we have provided the personal information you want to be erased to third parties, we need to inform them about your erasure request, so they can erase the personal information in question. We'll take reasonable steps to do this, but this may not always be possible or may involve disproportionate effort.

It may also be that the recipient is not required/able to erase your personal information because one of the exemptions above applies.

**Restricting processing of your information****When is restriction available?**

You have the right to restrict the processing of your personal information:

- where you disagree with the accuracy of the information, we need to restrict the processing until we've verified the accuracy of the information;
- when processing is unlawful and you oppose erasure and request restriction instead;
- if we no longer need the personal information but you need this to establish, exercise or defend a legal claim; or
- where you've objected to the processing in the circumstances detailed in paragraph (a) of "Objecting to processing", and we're considering whether those interests should take priority.

**Do we have to tell other recipients of your personal information about the restriction?**

Where we've disclosed your relevant personal information to third parties, we need to inform them about the restriction on the processing of your information, so that they don't continue to process this.

We'll take reasonable steps to do this, but this may not always be possible or may involve disproportionate effort.

We'll also let you know if we decide to lift a restriction on processing.

## **Taking your personal information with you**

### **When does the right to data portability apply?**

The right to data portability only applies:

- to personal information you've provided to us (i.e. not any other information);
- where the processing is based on your consent or for the performance of a contract; and
- when processing is carried out by automated means.

### **When can we refuse requests for data portability?**

We can refuse your data portability request if the processing does not satisfy the above criteria. Also, if the personal information concerns more than one individual, we may not be able to transfer this to you if doing so would prejudice that person's rights.

### **Objecting to processing**

You can object to processing in the following circumstances:

#### **(a) Legitimate interests**

You've the right to object, on grounds relating to your particular situation, at any time to processing of personal information concerning you which is based on legitimate interests.

If we can show compelling legitimate grounds for processing your personal information which override your interests, rights and freedoms, or we need your personal information to establish, exercise or defend legal claims, we can continue to process it. Otherwise, we must stop using the relevant information.

#### **(b) Direct marketing**

You can object at any time to your personal information being used for direct marketing purposes (including profiling related to such direct marketing).

If you sign up to receive newsletters or other e-mail messages from us, you can opt-out at any time free of charge by clicking the unsubscribe link at the bottom of the message or by contacting us:

**International:** +44 20 3059 7765

**Email:** [admin@dttvanuatu.com](mailto:admin@dttvanuatu.com)

**Postal:**

Direct Trading Technologies

Govant Building, BP 1276,

Port Villa, Vanuatu



### **Automated decision making and profiling**

You've the right not to be subject to a decision based solely on automated processing, including profiling, which has legal consequences for you or similarly significant effects.

As explained in the main part of our Privacy Policy, we use technology that does this. We only do so where:

- this is necessary for entering into, or performance of, a contract between us;
- this is authorized by applicable law; or
- we've obtained your explicit consent to do so for these purposes.

While we're confident that the technology works, we understand that not everyone is comfortable with decisions being left entirely up to machines. That is why you can request human intervention - let us know your concerns and contest the decision if you think our technology has got it wrong.