

PRIVACY POLICY

T.C.R. INTERNATIONAL LTD (“the Company”, “we”, “our” or us”) provides this Privacy Policy to inform you of our policies and procedures regarding the collection, use and disclosure of personal information we receive when you visit our website and when you use any part of our service available (the “Service”).

This Policy may be amended or updated from time to time. You are advised to consult this Policy regularly for any changes. This Policy is an integral part of the Site’s and Service’s General Terms and Conditions (the “Terms and Conditions”)

Our Commitment to You

At T.C.R. International Ltd. we respect the confidentiality of our clients’ personal information and thus we are committed to ensuring the security of any information T.C.R. International Ltd. is provided with by our prospective and / or existing clients as well as by visitors of our corporate website www.tcr-int.com, i.e. through this website. This code of confidentiality applies for any further information a new client or respectively an existing client provides T.C.R. International Ltd. within the course of electronic and physical correspondence with T.C.R. International Ltd.

All prospective and /or existing private clients of T.C.R. International Ltd. are treated as Data subjects in the sense of the Data Protection regulation 679/2016/EU. With regards to the provisions of the aforementioned regulation, the local management and / or the Universal Beneficial Owner(s) of all prospective and /or existing corporate clients of T.C.R. International Ltd., which are physical persons that represent a legal person, are treated as Data subjects in the sense of the aforementioned regulation.

Collection of Personal Information

In order to provide regulated financial services to our clients efficiently and accurately, when each new client applies to register to use our regulated services, we ask of them to submit certain personal information to T.C.R. International Ltd. during the client's assessment and Due Diligence procedure, as well as during the process of the Appropriateness Test and / or Suitability Analysis. For regulatory compliance, this may include client’s full name, date of birth, home and work addresses and telephone numbers, email address, passport number/or ID number, marital status, government issued photo ID with signature, financial information such as estimated annual income, net worth, liquid assets, previous trading experience and risk tolerance. The disclosure of the information as mentioned within this paragraph to T.C.R. International Ltd. is to be submitted willingly by the prospective and / or existing client.

Besides the above, we may also gather certain information about the clients' use of our services. This may include information from which they can be identified such as the times they log on (for instance, IP address, type of computer or telecommunication device used for accessing our corporate website, geographical location and internet access service provider of an individual visitor), their volume of use of our corporate website, the types of data, systems and reports they access, duration of sessions and other similar data. This data as described in this paragraph is collected automatically by the IT infrastructure of T.C.R. International Ltd.

T.C.R. International Ltd. offers the collection of KYC data from our prospective and / or existing clients via online services by external service partners, which remain legally and economically independent from T.C.R. International Ltd. Please refer to our DPO at compliance@tcr-int.com on

further information on the protection of your personal data, which you may submit to us via these services.

Furthermore, T.C.R. International Ltd. collects personal information, which is related to an individual visitor of our corporate website by the use of the contact form in the 'contact us' section of our corporate website.

At T.C.R. International Ltd., incoming and outgoing telephone calls may be recorded for training and monitoring purposes.

T.C.R. International Ltd. fulfils the role of the Data Controller of all data that the company collects from individual visitors of our corporate website as well as from our prospective and / or existing clients in line with the requirements of the Data Protection Regulation 679/2016/EU.

Uses Made Of Your Personal Information

We gather information in order to allow us to administer, support, and obtain feedback on our services, to identify and prevent faults with our services and the Site, to improve the services offered by us, to ensure we are maintaining adequate security measures, to prevent any security breaches of our Site, and to keep clients informed of products and services that may be of interest to them. We may also use this information, for research and analysis purposes such as monitoring website usage in order to help us develop the Site and improve our services.

We at T.C.R. International Ltd. also collect and process information as described in here above as to enable us to maintain regulatory and legal compliance when rendering regulated financial services to our clients. This concerns in particular the identification of a prospective and / or existing customer when making use of the regulated financial services offered by T.C.R. International Ltd.

All use and processing of personal data, which relates to an individual visitor of our corporate website is subject to that person's explicit consent. Also, the use and processing of personal information and data, which relates to a prospective and / or existing client of T.C.R. International Ltd. is strictly limited to the use as described within this privacy policy and subject to that prospective and / or existing client's explicit consent.

Further Uses Of Your Personal Information; Marketing

In addition, we may process your personal data for marketing purposes and there are several ways in which we at T.C.R. International Ltd. may use the personal information you have provided to us, including the following:

- We may contact you in order to present to you services to which you do not subscribe and which may be of interest to you according to your profile;
- We may wish to provide you with information about special features of our Site that we think may be of interest to you;
- We may provide you with information from our affiliates which we think may be of interest to you;
- We may invite you to client functions or entertainment events; and
- The above contacts may be via email, fax, post and/or telephone.

If you do not want us to use your personal information in this way, as an on-line subscriber, you may update your account to amend your marketing preferences at any time. T.C.R. International Ltd. has appointed a Data Protection Officer (DPO). This DPO remains independent within our corporate structure and has a direct connection to the top level management at T.C.R. International Ltd. By submission of electronic correspondence to compliance@tcr-int.com, you can get in touch with our DPO and submit your request with regards to your personal information.

Your Rights to your personal data

In line with the provisions and requirements of the Data Protection Regulation 679/2016/EU on the protection of personal data, you remain the following rights to your personal data:

- You remain the right to review all personal information, which is related to you and which was / is collected during your visit of our corporate website and during the use and processing as described in this privacy policy at any time and to check the accuracy of personal data, which is related to you individually.
- You remain the right to have done corrections, rectifications and refreshments to your personal data.
- You remain the right to have your personal data deleted partly or completely.
- You remain the right to obtain information on the use and purpose to process your personal data.
- You remain the right to limit the purpose for processing and use of your personal data. However, this may have an effect on the accessibility of our regulated financial services rendered to you. You can refer to our DPO and our Compliance Department for further clarifications on this.
- You remain the right to opt-out from commercial and non-commercial newsletters and notifications from T.C.R. International Ltd. by notification to our DPO accordingly.
- You remain the right to have all personal data, which is related to you and which is or had been collected during your visit and use of our corporate website and during your correspondence with T.C.R. International Ltd., being transferred to another Data Controller nominated by you.
- You remain the right to withdraw your previously given explicit consent with regards to the collection, use and processing of your personal data at any time by contacting our Data Protection Officer by electronic mail services to compliance@tcr-int.com.

You can submit your request to make use of the above rights to your personal data by contacting our Data Protection Officer (DPO) through electronic mail services to compliance@tcr-int.com.

Disclosure of your information

We will not without your consent disclose to third parties any individually identifying information, such as names, postal and e-mail addresses, telephone numbers, or other, which you have provided to T.C.R. International Ltd.

The rendering of regulated financial services to our company's prospective and / or existing clients requires the disclosure of personal data related to our prospective and / or existing clients in order to fulfil requirements defined by the regulatory legal framework in the Republic of Cyprus. Hence, we

may pass on information related to our prospective and / or existing customers to third parties such as our professional and legal advisors, administrators or subcontractors. T.C.R. International Ltd. ensures the confidentially treatment of all disclosed data to external parties. You remain the rights to your personal data as described within this privacy policy.

Personal data, which is collected during the visit of our corporate website and by the use of the contact form in the 'contact us' section of our corporate website may be disclosed to licensors of the software used on the Site. Please refer to our Data Protection Officer (DPO) in case you have questions on this or in case you want to make use of your rights related to your personal data as described in this privacy policy.

We may also disclose your personal information to third parties if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Site Terms and Conditions. Furthermore, your personal data is permitted to be disclosed to public bodies only in cases where the disclosure concerns matters of national and/or international security, the prevention or investigation of criminal activities, law enforcements, where a public interest is given, a juridical proceeding against the person, to which the personal data is related is pending or had been initiated or completed before and/or the personal security of the individual to which the personal data is related.

T.C.R. International Ltd. will communicate the use of your personal data to you prior to its use or processing as described in this privacy policy.

Your consent

By submitting your information either through our corporate website www.tcr-int.com or by electronic or physical correspondence with T.C.R. International Ltd. you consent to the use by T.C.R. International Ltd. of that information, as set out in this policy. By accessing and using this you are acknowledging that you have read, understood and agree with this privacy policy. We reserve the right to change our privacy policy from time to time and will update this page accordingly. Please review our policy as often as possible – your continued use of the Site will signify that you are made aware of any such changes.

The Site may, from time to time, contain links to and from the websites of our partner networks and affiliates. If you follow a link to any of these websites, please note that these websites may have their own privacy policies and that we do not accept any responsibility or liability for these policies or the content of external websites from legally and economically independent entities. Please check these policies before you submit any personal data to these websites.

How we protect your information

T.C.R. International Ltd. takes responsible to store your information in its protected physical archives and protected electronic databases for reference in order to answer queries or resolve problems, provide improved and new services and to meet any legal data retention requirements and regulatory compliance requirements. This means we may retain your information after you stop using the Site or our services or otherwise interacting with us over the applicable time period of five years, starting by the date your terminate your relations with T.C.R. International Ltd.

All electronic information you provide us with is stored on secure and protected servers. The transmission of information via the internet is secured using Secure Socket Layer (SSL) technology with high security 128bit encryption. However, we have put in place various internal security procedures and a Business Continuity Plan (BCP) as set out in this policy. Once we have received

your information, we strictly follow these procedures and security features in order to prevent unauthorized access.

Failure to Provide Personal Information

You have a choice to supply any or all of the personal information required. However, missing information may result in T.C.R. International Ltd. being unable to open or maintain your account and /or to provide you with our services.

If you feel the rights to your personal data had been infringed by T.C.R. International Ltd., please get in touch with our DPO at compliance@tcr-int.com.