

## PRIVACY POLICY

T.C.R. International Ltd (“the Company”, or “we”) provides this Privacy Policy (“the 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 services (the “Services”).

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

### Our Commitment to you

We respect the confidentiality of our former, current and perspective clients’ personal information and thus we are committed to ensuring the security of any information the Company is provided with by our former, current and perspective clients as well as by visitors of our corporate website (collectively “you”).

When processing personal data, the Company and its representatives/agents are subjects to the provisions of the General Data Protection Regulation (EU) 2016/679 (“GDPR” or “Regulation”) and the Cyprus Law 125(I) of 2018. We act as a data controller (as defined in the GDPR) for the purposes of this Policy, which means that we determine solely or jointly with others, the purposes and means of the processing of personal data.

You are treated as data subject in the sense of GDPR. The use and processing of personal information and data, which relates to you is strictly limited to the use as described within this Policy and subject to your consent.

This Policy provides, inter alia, information on the following key areas:

- the principles relating to the processing of personal data;
- the legal basis for the processing of personal data;
- the categories of personal data that are collected and processed by the Company;
- the recipients or categories of recipients of personal data;
- individuals’ rights under GDPR and an explanation of how those rights can be exercised.

### Definitions

For the purposes of this Policy:

“**personal data**” means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular

by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

**“data subject”** refers to any living individual whose personal data is collected, held or processed by us.

**“processing”** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

**“data controller”** means a natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

**“data processor/processor”** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

**“recipient”** means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not.

**“third party”** means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data;

**“consent”** means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

**“genetic data”** means personal data relating to the inherited or acquired genetic characteristics of a natural person which give unique information about the physiology or the health of that natural person and which result, in particular, from an analysis of a biological sample from the natural person in question;

**“biometric data”** means personal data resulting from specific technical processing relating to the physical, physiological or behavioural characteristics of a natural person, which allow or confirm the unique identification of that natural person, such as facial images or dactyloscopic data;

**“data concerning health”** means personal data related to the physical or mental health of a natural person, including the provision of health care services, which reveal information about his or her health status.

## Principles for data processing

As per GDPR's requirements, the Company shall ensure that your personal data is:

- (1) processed lawfully, fairly and in a transparent manner in relation to individuals ('lawfulness, fairness and transparency');

- (2) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes ('purpose limitation');
  - (3) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation');
  - (4) accurate and, where necessary, kept up to date; every reasonable step shall be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy');
  - (5) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed ('storage limitation');
  - (6) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality').
- The Company shall always be able to demonstrate compliance with the abovementioned principles ('accountability').

## Legal basis for the processing of your personal data

Your personal data is processed lawfully, fairly and in a transparent manner on the following bases:

### 1. *For the performance of a contract*

The processing of your personal data is necessary for the performance of a contract, namely the Agreements for the provision of Services to which you are party, or in order to take steps at your request prior to entering into an agreement. In order to be able to render investment and ancillary services to you and administer our relationship, we need to collect certain personal information.

### 2. *For compliance with a legal obligation*

The processing of your personal data is necessary for compliance with the legal obligations emanating from a number of laws to which the Company is subject, e.g. the Investment Services and Activities and Regulated Markets Law of 2017, the European Markets in Financial Instruments Directive ('MiFID II'), the European and Cyprus legislation on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing, the Common Reporting Standard ('CRS'), the Foreign Account Tax Compliance Act (FATCA), the Market Abuse Regulation ('MAR'), the European Market Infrastructure Regulation ('EMIR'). Compliance with these legal obligations requires, inter alia, identity verification procedures, anti-money laundering controls, the retention of personal data for a certain period of time, the disclosure of personal data to the supervisory and other public authorities, etc.

## Collection and processing of personal data

For the provision of the Services to you, during the due diligence and assessment procedure, appropriateness test and suitability analysis, regulatory compliance we need to collect the personal data associated with the individuals and legal entities, including but not limited to:

i) Personal information:

Full name, date of birth, place of birth, passport and/or ID number, home and work addresses, contact details (telephone number, email address, fax number), FATCA/ CRS information (tax residency, tax identification number), citizenship, nationality, occupation, employment and education history (CV or personal profile), government issued photo ID with signature;

ii) Financial information:

Current/estimated annual income, net worth, liquid assets, source of funds, investment objectives, bank account details (bank account name, account number, available balances, transaction history), previous trading experience and risk tolerance.

iii) In case of legal entity, the personal data mentioned in section i) and ii) will be collected also on the individuals who are directors, secretaries, shareholders, ultimate beneficial owners, controlling persons and authorized representatives.

iv) In case of trust, in addition to the information mentioned in section i), ii) and iii) the personal data on the individuals who are trustees, settlors and protectors will be collected.

We may also collect and process personal data from public sources (Registrar of Companies, Commercial Registry, the press, the Internet, etc.), as well as from screening databases.

Besides the above, we may also gather:

a) certain information about the use of our Services. This may include information from which you can be identified, such as the times you 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), the volume of use of our corporate website, the types of data, systems and reports you access, duration of sessions and other similar data. The described data is collected automatically by the IT infrastructure of the Company.

b) 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 the website.

c) information in order to keep you informed of products and services that may be of interest to you. 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.

The use and processing of personal data, which relates to an individual visitor of our corporate website is subject to that person's explicit consent.

The Company shall NOT collect from you any of the special personal data, such as:

- data revealing racial or ethnic origin
- data revealing political opinions
- data revealing religious or philosophical beliefs
- data revealing trade union membership
- genetic data

- biometric data processed for the purpose of uniquely identifying a natural person
- data concerning health
- data concerning a natural person's sex life or sexual orientation

### **Your obligation to provide us with your personal data**

The provision of your personal data is a requirement necessary to enter into a contract with the Company. In addition, from time to time we may ask you to confirm the accuracy of your personal data. Failure to provide us with up to date and accurate personal data will not allow us to commence or continue our business relationship or to execute an occasional transaction, as compliance with our legal obligations will be deemed impossible.

In cases where our business relationship was not completed within 6 (six) months from the date of last communication, your personal data will be destroyed without further notice.

### **Marketing**

We may process your personal data for marketing purposes and there are several ways in which we 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 website 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.

### **Recipients or categories of recipients of your personal data**

In the course of the performance of our contractual and statutory obligations and for legitimate business purposes, upon your consent your personal data may be disclosed to:

- a) Auditors, lawyers, consultants, administrators, subcontractors and other outside professional advisors of the Company, subject to confidentiality agreements;
- b) Third party processors such as payment services providers, companies who assist us with the provision of Services to you by offering technological expertise, solutions and support, bound by contract to comply with the GDPR provisions;

c) Licensors of the software used on our corporate website, which has been collected during the visit and by the use of the contact form in the 'contact us' section;

d) Public authorities, for example Cyprus Securities and Exchange Commission, the Unit for Combating Money Laundering (MOKAS), Central Bank of Cyprus, tax authorities, other supervisory bodies, when required by the applicable laws and regulations or upon request. Public authorities to which personal data are disclosed in accordance with a legal obligation for the exercise of their official mission should not be regarded as recipients if they receive personal data which are necessary to carry out a particular inquiry in the general interest, in accordance with Union or Cyprus law.

Where we transfer your personal data to third countries, we do it on the basis of standard contractual clauses adopted by the European Commission or to countries and international organisations that provide an adequate level of protection, based on the European Commission decision.

### **Period for which your personal data will be stored**

We will keep your personal data for the duration of our business relationship and for five (5) years after the termination of our business relationship or after the date of an occasional transaction, unless otherwise requested by a competent authority, in line with the provisions of the applicable European and Cyprus legislation on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing, the Markets in Financial Instruments Directive ('MiFID II') and the corresponding Investment Services and Activities and Regulated Markets Law of the Republic of Cyprus. We may keep your data for longer if we cannot delete it for legal or regulatory reasons. In particular, the retention of data is not limited in time in the case of pending legal proceedings or an investigation initiated by a public authority, provided that in each case the Company has been informed of the pending legal proceedings or the investigation initiated by a public authority within the retention period described hereinabove. This means we may retain your information after you stop using the website or our services or otherwise interacting with us over the applicable time period of five years, starting by the date you terminate your relations with the Company.

### **Your rights**

You have the following rights regarding your personal data we control and process:

1. *The right of access*

The right to request access to, or copies of, your personal data, together with information regarding the processing of those personal data.

2. *The right to rectification*

If you discover that the information we hold on you is inaccurate or incomplete, you can request that it be updated.

3. *The right to erasure (the right to be forgotten)*

You can request that we erase your data in certain circumstances, such as when the data is no longer necessary, the data was unlawfully processed or it no longer meets the lawful ground for which it was collected. This includes instances where your consent is withdrawn.

#### 4. *The right to restrict processing*

You can request that we limit the way we use your personal data. It's an alternative to requesting the erasure of data, and might be used when you contest the accuracy of your personal data or when you no longer need the information but we require it to establish, exercise or defend a legal claim.

#### 5. *The right to data portability*

You are permitted to obtain and reuse your personal data for your own purposes across different services. This right only applies to personal data that you have provided to us by way of a contract or consent.

#### 6. *The right to object*

You can object to the processing of personal data that is collected on the grounds of legitimate interests or the performance of a task in the interest/exercise of official authority. We will stop processing information unless we can demonstrate compelling legitimate grounds for the processing that overrides the interests, rights and freedoms of the individual or if the processing is for the establishment or exercise of defense of legal claims.

#### 7. *The right to withdraw of consent*

You have the right to withdrawal of consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

#### 8. *The right to lodge a complaint with a supervisory authority*

Before lodging your complaint with a supervisory authority, you may address your concerns to our DPO at [dpo@tcr-int.com](mailto:dpo@tcr-int.com) in regard to any issue concerning the processing of your personal data and to exercise your rights.

If your concerns are not addressed, you may lodge a complaint with the Commissioner. For lodging a complaint with the Commissioner, please visit the Commissioner's website <http://www.dataprotection.gov.cy/>, section "Lodge a complaint".

### **How we protect your personal data**

We will ensure that your information is secure and that we have appropriate safeguards in place to protect it at all times. We have implemented appropriate technical and organisational measures, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage in order to ensure appropriate security of your personal data.

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.

### **Changes to the Policy**

We reserve the right to change this Policy from time to time and will update this page accordingly. Please review our policy as often as possible – your continued use of the website will signify that you are made aware of any such changes.

The website 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 the policies before you submit any personal data to these websites.

### **Data Protection Officer (“DPO”)**

The Company has appointed a Data Protection Officer. DPO remains independent within our corporate structure and has a direct connection to the top-level management of the Company. For any further information on the protection of your personal data, which you submit to us for the use of the Services or in case you want to make use of your rights related to your personal data as described in this Policy, please get in touch with our DPO and submit your request to [dpo@tcr-int.com](mailto:dpo@tcr-int.com).