

# Privacy Policy

## TD Investments Limited

### **Introduction**

TD Investments LTD is a private limited company incorporated in Mauritius, with registration number 209162, and registered address at 33, Edith Cavell Street Port-Louis, 11324 MAURITIUS (hereinafter "TD Investments" or "the Company"). TD Investments LTD is authorized and regulated by the Financial Services Commission of Mauritius ("FSC") under the Securities Act 2005.

This Privacy Policy explains how TD Investments collects personal data about you and how it maintains, uses and discloses that data. TD Investments is committed to protecting the privacy of all personal information which is obtained from you, including the information we obtain during your visits to the website and our app. TD Investments will only use your personal information in accordance with this Privacy Policy.

### **Collection of Personal Information**

We collect information required to open an account, to transact business effectively and to safeguard your assets and your privacy. To do this, we gather information to help us assess your needs and preferences. The information we collect directly from you includes information required to communicate with you, including your name, mailing address, telephone number, e-mail address. We also collect birth date and your location information. All information is collected in accordance with data protection and money laundering legislation.

## **Data to be collected**

While using TD Investments website and/or trading platform and/or App, TD Investments may derive information from such use and may store this information with your personal profile. This information may include site reas visited, pages viewed, frequency and duration of visits, Internet Protocol (IP) address, your Geographic location, computer identification parameters or version of app used and the date the app was installed, types of transactions conducted, documents downloaded, mouse clicks, mouse movements, scrolling activity as well as text you type in this website and which website referred you to ours or to which websites you link, your internet Access Service provider, type and model of computer or telecommunication device used by website visitor, frequency and duration of sessions per page visit, data and documents of website accessed by website visitor, language preference and preference to receive communication from us. By entering into a business relationship and in the course of correspondence in physical or electronic form with TD Investments, we will collect and store personal information about you, as it is required to provide you with the services you requested and to comply with its legal and regulatory obligations. This includes, among others, your date of birth, your address and a photocopy of your national ID card, passport, or other form of ID and a copy of a recent utility bill or other proof of address. We may obtain personal information as a result of authentication or identity checks, including checks with credit reference agencies (who may keep a record of the information) to prevent fraud. TICs (Tax Identification Codes), country of residence, geo location information, information related to your financial status, such as your bank account/s and Credit Card/s details or other means of payments, the origin of funds, annual income, deposits and withdrawals history, information in regards to funds and financial instruments kept by the Company on your behalf, occupation, relevant data and types of transactions conducted, documents downloaded and/or uploaded, phone number and email address. We may also process special personal data (biometric data) if you have provided us with your explicit consent to use such data in a certain way.

TD Investments also collects and processes personal information about you that are necessary for us, in order to provide you with our services. This includes information about you when you complete an online application or another type of form and when you access and trade through your account.

## **Usage of Personal Information**

We use personal information collected from existing and/or prospective clients only as appropriate to render quality service and client security. By doing so, we strictly limit the use of personal data to the purpose for which the informed consent of the individual data subject, to which personal data relates, was given to TD Investments through the present Privacy Policy. This may include, among other purposes:

- verifications of an identity and contact information
- the setup of a trading account, the issuing of a client account number and a secure password,
- to manage your account and to provide the services to you that you have requested including processing transactions
- to maintain the activity of a client account and client profile
- to contact you when necessary or appropriate in relation to the services being provided to you.
- to keep you updated whilst you are a customer in relation to matters such as contracts you have traded and activities of TD Investments .
- For marketing purposes, including, but not limited to providing you with
- information regarding the products and services offered by TD Investments or its Partners.
- In developing an understanding of the products and services that you may be interested in obtaining from TD Investments or its Partners.
- To provide you with information or opportunities that we believe may be relevant to you.
- To tailor the website and our app to your needs and interests.
- To create impersonalized statistical data.
- To enforce the governing terms and conditions.
- To conduct surveys and questionnaires.

## **Maintenance of Records and Security**

Record-keeping procedures are in accordance with the applicable regulation. All company's records are maintained for at least five years or for a longer period as requested by regulatory authorities. In any case, TD Investments may keep any aggregated or anonymized information for the purposes described in this Privacy Policy, for longer periods. We are aware of the requirement to ensure your data is protected while retaining

it, against accidental loss, disclosure, destruction and or abuse. We have implemented appropriate technical and organizational measures and processes to guard against such breaches. Such measures and safeguards may include encryption during information transmission and storage, strong authentication mechanisms and the segmentation of digital architecture to zones that are policed and protected. We have implemented a strategy of 'least possible access' and periodically review existing access. While such systems and procedures significantly reduce the risk of security breaches and the inappropriate use of personal information, they do not provide absolute security. The Company will regularly review its security posture with reference to the latest standards to effectively eliminate the likelihood of any form of misuse.

### **Our Affiliates and Partners**

We may share data with partners, contractors, service providers, transaction processors, advisors and affiliates of TD Investments (including but not limited to credit reference agencies, online verification providers, fraud prevention agencies, companies we have a joint venture or agreement to co-operate with, market researchers, professional Advisors, technology providers, banks and payment service providers (hereinafter referred to as the "Partners") who need to access such information for the purposes described in this policy. Those with access to personal information are obligated to comply with strict standards of confidentiality and protection of personal information. While using TD Investments App, TD Investments may share information from such use with its technology Partners for the purposes of contacting you when necessary or appropriate regarding the services being provided to you through the App, and for keeping you updated for matters such as contracts you have traded and activities of TD Investments, as well as for marketing purposes, including, but not limited to providing you with information regarding the products and services offered by TD Investments.

We may also forge partnerships and alliances, which may include joint marketing agreements, with other companies who 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, we may share some information with partners, affiliates and alliances. This allows them to better understand the offers that are most relevant and useful. The use of your personal information is limited to the purposes identified in our relationship with the partner or affiliate. To help us improve our services to you, we may engage another business to help us to carry out certain internal functions such as account processing, fulfilment, client service, client satisfaction surveys or other data collection activities relevant to our business. We may also provide a

party with client information from our database to help us analyze and identify client needs and notify clients of product and service offerings. The use of the shared information is strictly limited to the performance of the task we request and for no other purpose. All third parties with which we share personal information are obliged to protect personal information in a similar manner to the way we protect personal information. However, all the disclosures of personal data to third parties are limited to the purpose for which the informed consent of the individual data subject, to which personal data relates, was given to TD Investments through the present Privacy Policy.

### **Non-Affiliated Third Parties**

We do not sell, license, lease or otherwise disclose your personal information to any third party for any reason, except as described below. We may share information with law enforcement agencies, information protection authorities, and other competent authorities as well as with other competent third parties, as may be required by law or regulation or if TD Investments believes that you performed any act or omission that might be violating any applicable laws, rules, or regulations, or if TD Investments is obliged, or believes that it is obliged by law to share or disclose your information to applicable authorities or to any other third party.

We may also disclose your information as necessary to credit reporting or collection agencies, or when necessary to protect our rights or property.

### **Statistical Data**

TD Investments may combine your personally identifiable information with information from other users of this website to create impersonalized statistical data for the purposes of monitoring and improving service. TD Investments may provide this statistical data to third parties. Under no circumstances will you be able to be identified from this statistical data; you will remain anonymous.

## **Restriction of Responsibility**

If at any time you choose to purchase a product or service offered by another company, any personal information you share with that company will no longer be controlled under our Privacy Policy. We are not responsible for the privacy policies or the content of sites we link to and have no control of the use or protection of information provided by you or collected by those sites. Whenever you elect to link to a co-branded Web site or to a linked Web site, 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 provided by that third party.

## **Google Analytics**

We may use the information we collect to assist us in delivering relevant ads to you (Remarketing). Remarketing is a way for us to connect with our websites and ads visitors, based upon their past interactions with our website and ads. Third-party marketing vendors may be hired by TD Investments to perform such remarketing services. As a result, third-party vendors, including Google, may show TD Investments' ads on internet sites. Such third-party vendors, including Google, may also use their cookies, third party cookies and similar technologies to serve ads based on a visitor's prior visits to TD Investments' website. You may opt out of Google Analytics for Display Advertisers and opt out of customized Google Display Network ads by visiting Google's Ads Preferences Manager. You are also encouraged to visit further information you can also visit [Google Analytics Opt-out Browser Add-on](#). For further information you can also visit [Google's privacy center](#).

## **Use of Cookies**

A cookie is a small text file stored on the user's computer for record keeping and security purposes. It allows us to enhance user experience while browsing our website. TD Investments issues cookies upon landing on our website unless the cookie settings on user's browsers are disabled. Please be notified that by turning off cookie tracking in your browser, some of our services might become unusable such as promotions or registration. Cookies used by us do not contain any personal information nor do they contain account or password information. They merely allow the site to recognize that a page request comes from someone who has already logged on. To manage, control and improve our web site, we may use a third party to track and analyze usage and statistical volume 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 us. These cookies do not contain any personally identifiable information. Transfer of Data to third countries You acknowledge that TD Investments, by its nature as an online service, may store and process information in various sites, throughout the globe. If you are a resident in a jurisdiction such as European Economic Area Member States, where transfer of your personal information to another jurisdiction requires your consent, then you provide us your express and unambiguous consent to such transfer.

## **Marketing communication**

While registering your information with us, you have agreed to receive marketing services, which provides you with information regarding the products and services offered by TD Investments or its partners and opportunities that we believe may be relevant to you, newsletters, emails and SMS (text) messages, and other electronic communication. If you no longer wish to receive the above-mentioned types of communication, you may opt-out by following the instructions included in each message or by sending an email to [compliance@tdinvest.finance](mailto:compliance@tdinvest.finance).

## **Your Rights**

You need not give us any of the personal information requested by TD Investments. However, without the information requested in the application form or otherwise, we may not be able to open an account for you, or to provide you with any other services, information, or assistance you have sought or evaluate the appropriateness of the service

you are requesting. You may inform TD Investments at any time that your personal details have changed or that you wish to delete the personal information we hold about you by emailing us at [compliance@tdinvest.finance](mailto:compliance@tdinvest.finance). We will change or delete your personal information in accordance with your instructions, except to the extent that we are required to hold your personal information for regulatory or legal purposes, to provide you with the services you have requested or to maintain adequate business records. If you have a request to receive a copy of the data we retain about you, please write to TD Investments, verifying your identity and setting out in full what information you require. We will charge a fee as allowed by applicable law to cover the cost of verifying the application and locating, retrieving, reviewing, and copying any material requested. Where we rely on your consent to process certain personal data, you can withdraw such consent at any time by contacting [compliance@tdinvest.finance](mailto:compliance@tdinvest.finance). TD Investments is doing its utmost to comply with this Privacy Policy. If you have any questions, concerns or complaints regarding this Policy and the enforcement thereof, please refer them to: [compliance@tdinvest.finance](mailto:compliance@tdinvest.finance). After receiving your complaint, TD Investments may contact you to better understand your concerns and will make all efforts to promptly answer your question or resolve your complaint to your full satisfaction.

### **Changes to This Privacy Policy**

From time to time, we may update this Privacy Policy. In the event we materially change this Privacy Policy, the revised Privacy Policy will promptly be posted to the Company's websites and we will post a notice on our websites informing you of such change. You agree to accept posting of a revised Privacy Policy electronically on the website as actual notice to you. Any dispute over our Privacy Policy is subject to this notice and our Terms and Conditions. We encourage you to periodically check back and review this policy so that you always will know what information we collect, how we use it, and to whom we disclose it. If you have any questions about this Policy, please contact a Client Services representative at [compliance@tdinvest.finance](mailto:compliance@tdinvest.finance).