

Privacy and Security Policy of TRILT LTD

This Privacy and Security Policy explains how TRILT Ltd (“**TRILT**” or the “**Company**”) collects its Clients’ personal data, and how this is maintained, used and disclosed.

The Company’s primary interest lies in the safeguarding of its Clients’ privacy, by ensuring that all personal data which is obtained from its Clients, including all the data that is obtained by TRILT when a Client visits the Company’s websites. Information collected by TRILT is handled, retained and processed only by means that are in accordance with mandatory legal requirements and only to the extent it is strictly necessary for the achievement of the purposes set out herein.

Personal Information Collected

TRILT collects and processes personal information of its clients only insofar as to provide its Clients with the relevant services, as these are set out in the section “**Use of personal information**” below. In addition, personal information of Clients may also be obtained for the purpose of identifying clients through the various authentication requirements set out by TRILT in its Terms and Conditions. Clients’ personal information may also be authenticated by external and independent Credit Reference Agencies (who may keep a record of this information) for the purpose of fraud prevention.

Personal information may also be collected by TRILT given the Clients’ use of the website. Such information will be stored in a Client’s personal file. Information collected via the use of the website may include pages viewed, frequency and duration of visits, types of transactions conducted, documents downloaded and other websites which may have referred Clients to the Company’s website, or websites to which Clients link the TRILT website.

By visiting the Company’s websites, the Client accepts and consents to the practices described in this Privacy Policy, including acceptance and consent to the Company’s practice of collecting anonymous site statistics (including frequently visited pages and search requests) which TRILT may pass to trusted third parties. It is explicitly noted that the statistics collected in the manner described above never include any information that can identify any of the Company’s clients personally.

Links

The Company’s Privacy Policy does not extend to other websites to which a Client may be linked through by visiting the Company’s website. TRILT is not, in any way, responsible for any personal information that may be submitted by its Clients to any third parties through its website.

Handling of personal information

TRILT employees are committed to complying with very strict standards of confidentiality in the process of handling personal information. For this reason, the accessing of personal information is prohibited for TRILT employees, with the exception of those employees who are in charge for the handling and processing of such information.

Security

TRILT takes all steps reasonably possible to ensure that the appropriate safeguards are maintained and that the privacy of the Client's data and/or personal information that the Client is secured and not misused in any way. Measures and safeguards taken by TRILT ensure that the data is encrypted during their transmission, that the proper authentication mechanism are in place, and that all machines and data are kept separate for the provision of secure areas.

Use of personal information

Anonymous statistical information concerning its Clients is collected by TRILT. This procedure ensures that the needs of the Company's clients are met through the intensive monitoring and constant improving the services offered by TRILT to its Clients.

Personal information is collected by TRILT for the following uses:

- The provision of services to Clients, including the processing of transactions;
- The confirmation of Clients' identity;
- The assessment of Clients' suitability in relation to the products and services provided by TRILT.
- Maintaining the Clients' personal profile;
- The general management of Clients' Accounts;
- The personal contact with Clients to ensure that Clients are informed where necessary or appropriate in relation to the services being provided to them;
- Keeping Clients constantly up-to-date with regards to their trading activities with TRILT;
- The management and administrations of products provided by TRILT to its Clients;
- The personalization of the website to meet the needs and interests of the Company's Clients and the improvement and creation of new products and services that may be of interest to the Client;
- The gathering of statistical data for the purposes described above, which in no way identify a Client personally.

By registering with TRILT, the Clients will also be given the opportunity to accept or reject a subscription to the following services, for the purpose of Marketing:

- the provision to the Client of information on the products and services offered by TRILT;
- and

- the provision to the Client of information regarding opportunities that TRILT believes may be relevant to the Client.

TRILT does not sell or otherwise transmit its Clients' personal information to third parties for marketing purposes.

Unsubscribing

At all times, the Clients will be given the option to unsubscribe from any marketing services to which they previously subscribed, by clicking the relevant link at the bottom of the respective service's e-mail.

Transmission of data in the European Economic Area

Customer registration with TRILT means the Clients consent to the disclosure and transfer of their personal information by TRILT within the European Economic Area ("EEA") to the following institutions and solely for the following purposes:

- Financial institutions and other similar organisations that, in the course of executing Client orders, liaise with TRILT;
- Financial institutions and other similar organisations that, in the course of executing Client orders, are nominated by the Clients;
- External service providers and professional advisors that provide services to TRILT in order to enable TRILT to provide the services the Clients request;
- At the Clients' request, any Organization or any persons acting on behalf of the Clients, including but not limited to financial advisors, brokers, solicitors or accountants;
- Third parties that may process transactions or provide services requested by the Clients; or
- Any local or international authority that may request any such information from TRILT.

Information will be disclosed by TRILT to the above institutions only where it is satisfied that in any particular case separately, the said institutions provide the proper safeguards for data protection.

Transmission of data to third parties

By completing the registration procedure, Clients are deemed to consent to the transmission of their personal data to countries which are not Member States of the EEA. Transmission under these circumstances is only effected where the transmission of such data is permitted by law and the laws of the third country in question ensure an adequate level of protection with respect to the processing of the personal data transferred.

Client Information Update

The Client may, at any time, inform TRILT that their personal details have changed or that the Client wishes for TRILT to delete their personal information from its files, by sending an e-mail

to support@trilt.com. Where TRILT is not obliged to hold such information due to regulatory or legal obligations, or where the information is necessary for the adequate provision of its services, TRILT will change or delete its Clients' information upon such request.

Cookies

Upon registration, Clients must use the Company's software for trading purposes. The said software enables TRILT to use cookies in relation to the Clients' access to its website. (For information purposes, the Client is informed that Cookies are small files of information, which often include a unique identification number or value, which, due to the use of the Company's software and accessing the Company's websites, are stored on the Clients' computer).

TRILT uses session ID cookies and persistent cookies. Session ID cookie expire upon closing the browser. Persistent cookies remain on the Clients' hard drive for an extended period of time. These Persistent cookies are used by TRILT for statistical purposes, for tracking and targeting the location and interests of users, and for enhancing the services provided by TRILT. Persistent cookies may be removed as per the instructions in each Internet browser's "help" file.

Client's rights

Clients are under no obligation to provide TRILT with any of their personal data. However, non-provision of the requested information may mean that TRILT will be forced to reject Clients' applications for opening an account with TRILT, or will not be able to provide a Client with any services, information, assistance, or be in a position to improve the services requested and provided by TRILT.

Changes

TRILT reserves the right to make, from time to time, alterations, additions or deletions to its Privacy Policy, for any reason. Clients will be notified of such changes through the Company's website, where the most updated version of the Privacy Policy will be posted. It is the Clients' responsibility to stay constantly informed of the Privacy Policy. Where a Client uses the Company's website after such changes to the Privacy Policy, the Client is deemed to have consented to the said changes.

Contact

For any issues which have not been expressly addressed in this Privacy Policy, the laws of Cyprus apply. Where a Client wishes to contact TRILT for the purpose of submitting a comment, or complaint, or communicate the alleged infringement of their privacy rights, the Client may contact TRILT by e-mail at support@trilt.com, or directly contact one of our customer service representatives on telephone number **+357 25510210**, or fax number **+357 25510211**.