

COOKIE POLICY

1. INTRODUCTION

- 1.1. TIOMARKETS CY Ltd (the “TIOMarkets” or “Company”) is a Cyprus Investment Firm (the “CIF”) incorporated in the Republic of Cyprus under the Department of the Registrar of Companies and Official Receiver, holding a Certificate of Incorporation with Number HE 399709.
- 1.2. TIOMarkets is authorised and regulated by the Cyprus Securities and Exchange Commission (the “CySEC”) (www.cysec.gov.cy), with License Number **TBC** and the operations of the Company are governed by the Investment Services and Activities and Regulated Markets Law 87(I)2017, which transposes the Directive 2014/65/ EU on Markets in Financial Instruments (“MiFID II”).
- 1.3. The European Union has adopted the EU General Data Protection Regulation (“GDPR”), is effective since 25th May 2018. The GDPR introduces new requirements for all companies processing personal data of individuals located in the European Economic Area (“EEA”); that also considers the usage of Cookies.

2. WHAT IS A COOKIE

- 2.1. 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. TIOMarkets 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 administer 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.
- 2.2. You can choose to disable or block these cookies in your browser but without some of them our site will not work. For more detailed information about cookies please visit www.allaboutcookies.org.

3. ANALYTICS TOOLS FOR THE WEBSITE

- 3.1. On our websites the web analytics tool Google Analytics is used to get a general information of how visitors use the site. Google Analytics uses Cookies to collect information in an anonymous form (aggregated) about how visitors use the website, for example, the number of page views, how visitors have arrived at the website, and the number of visits. The purpose is to help us improve the performance of the website and simplify its usage. The information produced your visits on website is sent to and stored by Google Inc. This site uses IP Anonymization in Analytics. The IP anonymization feature in Analytics sets the last octet of IPv4 user IP addresses and the last 80 bits of IPv6 addresses to zeros in memory shortly after being sent to the Analytics Collection Network. The full IP address is never written to disk in this case.

4. MARKETING COOKIES

- 4.1. These cookies improve your browsing experience so you can view more relevant content and advertising, which is designed to fit your preferences and devised from your activity on our websites. We only use our trusted partners like AdRoll.

5. WHAT HAPPENS IF I ACCEPT THE COOKIES AND THE POLICY

- 5.1. By clicking “I accept” you authorise us to use information gathered by your visits on our websites to improve our services and your experience.

6. WHAT HAPPENS WHEN I DECLINE COOKIES AND POLICY

- 6.1. If you click “I decline” we will not gather the information regarding usage of our websites, however, we will place on your device a unique identifier number, so next time when you come to any of our Websites we will not collect any additional information. There is no other technical solution in order to respect your decision of not accepting the Cookies and Policy, please however note, that you can always choose “forget me” option or send an e-mail to info@tiomarkets.eu and use “the right to be forgotten” we will instruct you further, then delete the information containing our unique number and your decision regarding the Cookies and Policy so next time when you visit any of our websites you will be recognised as a new visitor and therefore, you will be required again to either accept or decline Cookies and Policy. Please also note that you can always clear your cookies manually using your browser’s settings option.

7. YOUR RIGHTS

Under the [General Data Protection Regulation](#) you have a number of important rights. In summary, those include rights to:

- fair processing of information and transparency over how we use your use personal information
- The right to access personal data: via a Subject Access Request. Your request should be made in writing to info@tiomarkets.eu . We may ask you for proof of identity before providing you with the data. There is usually no charge for such requests, however in limited circumstances we may be able to charge an administrative fee (and we will inform you in response to your request if that is the case).
- The right to request that your personal data is corrected if it is found to be inaccurate: require us to correct any mistakes in your information which we hold.
- The right to request that your personal data is erased where it is no longer necessary. In some circumstances this right may not apply e.g. if there is some other compelling reason for us to keep or process your data (and we will inform you in response to your request if that is the case).
- Right to data portability: to receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party (another controller) in certain situations.
- The right to withdraw consent to processing at any time, where relevant i.e. where we are relying on your consent to process the data and not another legal reason for processing.
- The right to object at any time to processing of personal information concerning you for direct marketing.
- The right not to be subject to a decision which is based solely on automated processing, including profiling which produces legal effects concerning them or significantly affects them.
- The right to object in certain other situations to our continued processing of your personal information. Otherwise restrict our processing of your personal information in certain circumstances

If you would like to exercise any of those rights, please:

- email, call or write to us at info@tiomarkets.eu OR contact our Data Protection Officer at

dpo@tiomarkets.eu

- let us have enough information to identify you (e.g. account number, username, registration details),
- let us have proof of your identity and address (a copy of your passport/ID or driving licence and a recent utility or credit card bill), and
- let us know the information to which your request relates, including any account or reference numbers, if you have them.

If you would like to unsubscribe from any emailing or any marketing communications you can also click on the 'unsubscribe' button at the bottom of the email or by sending an email at info@tiomarkets.eu stating so.

8. LEGAL BASIS FOR PROCESSING PERSONAL DATA

8.1. Reasons we can collect and use your personal information:

8.1.1 Lawful basis for processing

Under EU data protection law, there must be a lawful basis for all processing of personal data (unless an exemption or derogation applies). We rely on:

- Contractual necessity Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract to conduct regulated activities, when processing is necessary for the entry into, or performance of contract with the data subject or in order to take steps at this or her request prior to the entry into a contract.
- Compliance with legal obligations Processing is necessary for compliance with our legal obligation. TIOMarkets has the necessity for compliance with a legal obligation.
- Legitimate interest Data will only be processed where it is necessary for the purposes of the legitimate interests pursued by TIOMarkets, and these interests or fundamental rights are not overridden by the interests, rights and freedoms of the data subject and that the processing would not cause unwarranted harm. For instance, it is a legitimate interest of TIOMarkets to process personal data on data subjects in order to expand the business, develop new business relations prevention of fraud, maintaining the security of our systems if/when necessary, enhancing, modifying or improving our services. The data subject must be given information on the specific legitimate interest if a processing is based on this provision.

9. KEEPING YOUR PERSONAL INFORMATION SECURE

Your Data is stored and kept confidential according to the legislation on protection of personal data and processing thereof applicable in the jurisdiction in which TIOMarkets, with which you have signed up, is located.

We have appropriate security measures in place to prevent personal information from being accidentally lost, misused, modification, disclosure or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

10. HOW LONG YOUR PERSONAL INFORMATION WILL BE KEPT

10.1. Data Retention:

You can close your account any time, but for audit trail purposes, TIOMarkets shall hold personal data for a period of at least five years after closing the account in order for us to comply with our record keeping obligations under the Money Laundering Regulations. At the end of that period, we will delete all personal data relating to you, unless a legal requirement requires them to keep the data for a prolonged period of time, or Data Subject has expressly consented to

their data being held for an extended period of time.

11. WHAT HAPPENS IN THE EVENT OF A CHANGE OF CONTROL?

If we sell or otherwise transfer part or the whole of TIOmarkets or our assets to another organization (e.g., in the course of a transaction like a merger, acquisition, bankruptcy, dissolution, liquidation), your information such as name and email address and any other information collected through the Service may be among the items sold or transferred. You will continue to own your User Content. The buyer or transferee will have to honour the commitments we have made in this Cookies Policy.

12. HOW TO COMPLAIN TO THE SUPERVISORY AUTHORITY?

We hope that our Data Protection Officer, client support or compliance team can resolve any query or concern you raise about our use of your information.

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in Cyprus is the Office of the Commissioner for Personal Data Protection ('Commissioner'): who may be contacted at commissioner@dataprotection.gov.cy or telephone at +35722818456.

13. NATIONAL REQUIREMENTS

TIOmarkets shall comply with both the GDPR and national data protection legislation. If applicable national legislation requires a higher level of protection for personal data than such policies/guidelines, such stricter requirements are to be complied with. If TIOmarkets policies/guidelines are stricter than the local legislation, our policies/guidelines must be complied with.

14. COMPANY'S CONTACT DETAILS

14.1. Clients shall communicate with the Company with the communication methods described within this policy and/or at the following address:

Correspondence Address:

TIOMARKETS CY Ltd
Athinon 80, 3040, Limassol, Cyprus

Customer Service:

Phone: +357 25 251008
E-mail: info@tiomarkets.eu