

## **PRIVACY POLICY**

This Privacy Policy describes how TOTAL GROUP Ltd (hereinafter - the Company) collects and uses information through its site total-group.com or any other sites operated by the Company. The Company is committed to safeguarding any information it collects, uses and holds about its clients. The Company recommends to get acquainted with the Policy before sign-up in the Trader's Room. If the Client has any enquiries regarding the Privacy Policy, they can get into touch with the Company using the contacts on the Company website.

Date of the latest update: 12.04.2023

### **1. THE CLIENT'S PERSONAL DATA**

- 1.1. In order to open an account with the Company, the Client completes and submits an application form. While the registration process the Client agrees to provide their personal data and copies of verifying documents.
- 1.2. The personal data provided by the Client may include:
  - 1.2.1. Personal information provided in applications and other forms: name, surname, address, date of birth, passport details, occupation, position;
  - 1.2.2. Financial information, i.e. investment experience of the Client;
  - 1.2.3. Identification documents: scanned copies of passport, utility bill, bank reference;
  - 1.2.4. Payment documents: transfer orders, bank statements, copies of credit/debit card, screenshots etc.
  - 1.2.5. Credit/debit card details (when depositing/withdrawing funds via credit/debit card).
- 1.3. The Company requests the personal information in order to identify and verify the Client and to comply with the relevant rules and regulations. This information may also be used by the Company to inform the Client regarding its service.
- 1.4. The Company asks the individuals under the age of 18 years to opt out of the registration and using provided by the Company service. The Company deems the privacy of the underage to be of great importance and thus does not collect the information on the individuals under the age of 18 years.

## **2. INFORMATION COLLECTED FROM THE CLIENT'S USE OF SERVICES**

- 2.1. Tracking systems used on the Company's website(s) may collect additional Client's data in order to optimize the services provided there for clients. This data may include information about the Client's device, log information, location information, cookies. By receiving this information, the Company can provide the Client with the most appropriate version of the website(s), to track user action and therefore troubleshoot any issues that may occur, improve the performance of the website(s), improve the future advertising campaigns.

## **3. CONFIDENTIALITY OF THE CLIENT'S PERSONAL DATA**

- 3.1. The Company shall not disclose to a third party any of its clients' confidential information unless:
  - 3.1.1. it is required to do so by a regulatory authority of a competent jurisdiction. In such circumstances, the Company undertakes to officially inform the third party about the confidential nature of the information.
  - 3.1.2. conveyance of the information to third parties is carried out for the sole purpose of processing the Client's trading and non-trading instructions. In this case the third parties may be associated or affiliated companies, auditors, agents (including payment agents), banks or other authorized organizations or persons.
- 3.2. In the case when the Client's personal data are collected for some third party which is not the Company's contractor/service provider, the Company undertakes to notify the Client about it, so that the Client can make a well-founded decision about whether, or not, they agree to share their information with that party.

#### **4. COOKIES**

- 4.1. A cookie is a small text file that is stored on a user's computer for record-keeping purposes. The Company uses cookies on its site(s). The Company does not link the information stored in cookies to any personally identifiable information the Clients may submit. The Company uses both session ID cookies and persistent cookies. A session ID cookie remains valid after the Client close browser. Persistent cookies are stored on hard drive for an extended period. Following the instructions in the help file of Internet browser, the Client can remove permanent cookies. The Company's website uses permanent cookies for statistical purposes. The use of persistent cookies also allows the Company to track and identify the location and the interests of users visiting the Company's site (s) and improve the quality of their services.
- 4.2. Several partners of the Company use cookies on the site (s) of the Company; the Company does not have access to such cookies, and does not control them.

#### **5. SAFETY AND PROTECTION OF THE CLIENT'S PERSONAL INFORMATION**

- 5.1. The personal information that the Client provides when registering as a user of the site(s) or the services is classified as Registered information. Registered information is protected in many ways. The Client can access the Registered information by means of the password selected by the Client during the registration. This password is encrypted and known only to the Client. The Client should not share the password with anyone. The Registered information is safely stored on secure servers accessible only to authorized personnel via a password. Besides, in order to secure the personal information, the Company may use SSL-certificate.
- 5.2. The personal information provided to the Company which does not qualify as Registered information, also resides on secure servers and is also accessible only to authorized personnel via password. The Client has no access to this information; therefore, the Client will not receive the password allowing to modify it.

#### **6. CREDIT/DEBIT CARD DATA SAFETY**

- 6.1. The Client's received confidential data is processed in processing center. The Client's credit/debit card details are not stored in the payment system after the moment of transaction made via the card.

## **7. CHANGES IN THE PERSONAL INFORMATION**

- 7.1. In case of any changes in the personal information the Client should inform the Company using the contacts on the website.

## **8. CONTENT OF EXTERNAL SITES**

- 8.1. The Company's website may include links to external websites that the Company does not have influence over, thus the Company is not responsible for their content. It is the provider of the website or of the information who is responsible for the external sites content.

## **9. LEGAL DISCLAIMER**

- 9.1. The Company reserves the right to disclose your personally identifiable information as required by rules and regulations, and when the Company considers that disclosure is necessary to protect our rights and/or to comply with a judicial proceeding, court order, or legal process served.
- 9.2. The Company will not be liable for any misuse or loss of personal information resulting from the use of cookies on the Company's website(s) that the Company does not have access to or control over.
- 9.3. The Company shall not be liable for unlawful or unauthorized use of your personal information due to misuse or misplacement of your passwords, negligence or malicious actions.

## **10. INTRODUCING CHANGES TO THE PRIVACY POLICY**

- 10.1. When the Company decides to make changes to the Privacy Policy, the Company will introduce such changes in this privacy statement, on the website and other places where the Company deems appropriate, so that the Client is aware of what information the Company collects, how the Company uses it and under what circumstances, if any, discloses it. The Company reserves the right to modify this Privacy Policy at any time, so please re-read it regularly. In the event of substantial changes to this policy, the Company will notify the Client by email or on the website. If the Client continues to use the website services or visits it, they agree automatically with changes introduced to the Policy.