

# **Privacy Policy and Cookie Disclosure**

This Privacy Policy and Cookie Disclosure describes how AAA Trading ('the Firm') collects and uses information through its site www.aaatrading.net and any other related sites and applications. This Privacy Policy and Cookie Disclosure does not apply to websites operated by other organisations and other third parties.

### Commitment

AAA Trading respects the privacy of any user that accesses its sites; therefore, the Firm is committed in taking all reasonable steps in safeguarding any existing or prospective clients, applicants and visitors.

## **Application**

In order to open an account with AAA Trading, you must first complete and send an application form by completing the required information. By completing the application form you are requested to disclose private information in order to enable the Firm to evaluate your application and comply with relevant rules and regulations. This information may also be used by the Firm to inform you regarding its services. Moreover, information about you may also be collected by any correspondence made with us by phone, e-mail or otherwise; including information which you enter when you register to use our site, subscribe to our service or any other activities carried out on our website or any connected applications.

### **Confidentiality and Client's Personal Data Protection**

AAA Trading Limited is registered with the Registrar General's Department of The Bahamas; therefore, any clients' personal data is kept by AAA Trading according to the laws and regulations of The Bahamas.

AAA Trading shall not disclose to a third party, any of its clients' confidential information unless required to do so by a regulatory authority of a competent jurisdiction; AAA Trading will endeavour, to make such disclosures on a 'need-to-know' basis, unless otherwise instructed by a regulatory authority.

Under such circumstances, the Firm shall expressly inform the third party regarding the confidential nature of the information.

Clients accept and consent that AAA Trading may, from time to time, contractually engage companies for statistical and/or other purposes in order to improve the Firm's business activities; as a result, some or all of the clients' personal data may be disclosed.

# Disclosure of your information

We may share your personal information with any member of our group, which means any subsidiaries, ultimate holding companies and its respective subsidiaries may receive such information. We may also share your information with certain third parties including business partners, suppliers and sub-contractors and advertisers. In the event that AAA Trading discloses information to business parties, for instance, card processing companies or banks, in order to

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effect the services requested by the clients; such third parties may store your information in orderto comply with their legal and other obligations.

### Information we may collect about you

Tracking systems used on the Firm's site(s) may collect data detailing the pages you have accessed, how you discovered this site, the frequency of visits etc; this information is obtained in order to improve the content of the Firm's site(s) and may also be used by AAA Trading to contact you, through an appropriate mean, and provide you with any information the Firm believes to be useful.

With regards to each of your visits to our site, we may, automatically collect information including internet protocol (IP) address, login information, browser type and version, time zone, phone numbers used to call our customer service number. We may receive information about you from third parties, for instance business partners, subcontractors, advertising networks, analytics providers, search information providers, credit reference agencies.

### Choice/Opt-out

If you no longer wish to receive any communication from the Firm, you may opt-out of by following the relevant instructions included in each communication sent by AAA Trading . AAA Trading reserves the right to contact you, albeit the fact that you have opted out, in cases where AAA Trading deems such contact as necessary.

You shall be notified accordingly if your personal information is collected by any third party that is not our agent/ service provider, so you can make an informed decision as to whether or not you want to share your information with that party.

#### Cookies

A cookie is a small text file that is stored on a user's computer for record-keeping purposes. AAA Trading uses cookies on its site(s).

AAA Trading uses both session ID cookies and persistent cookies. A session ID cookie does not expire when you close your browser. A persistent cookie remains on your hard drive for an extended period of time. You can remove persistent cookies by following directions provided in your Internet browser's 'Help' file.

AAA Trading sets a persistent cookie for statistical purposes. Persistent cookies also enable the Firm to track and target the location and the interests of users that access the AAA Trading site(s) and to enhance the experience of services offered.

If you reject cookies, you may still use the AAA Trading sites, but you may not be able to use the online account opening website to submit your application form.

Some of the AAA Trading business partners use cookies on the Firm's sites; AAA Trading has no access or control over these cookies.

# Security and Protection of your personal information

The personal information that you provide in connection with registering yourself as a user of the

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sites or of the services is classified as 'Registered Information. 'Registered Information' is protected in many ways. You can access your 'Registered Information' through a username and password selected by you. It is your responsibility to ensure that your password is encrypted and known only to you. Your password must not be revealed to anyone. 'Registered Information' is safely stored on secure servers that only authorised personnel have access to via a username andpassword. The Firm encrypts all personal information as it is transferred to AAA Trading and thus makes all necessary effort to prevent unauthorised parties from viewing any such information.

Personal information provided to AAA Trading that is not 'Registered Information' also resides on secure servers and is again accessible only by authorised personnel via a username and password this information cannot be accessible by you, therefore no password shall be provided in order for you to modify this.

Transmission of information via the internet is not always completely secure; we will exercise all endeavours to protect your personal data yet we cannot guarantee the security of your data transmitted; any transmission is at your own risk. Once we have received your information we will use procedures and security features to try to prevent unauthorised access. Furthermore, the data we collect from you may be transferred to, and stored at, a destination outside The Bahamas. It may also be processed by staff operating outside The Bahamas who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing and processing. The Firm will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with the Data Protection (Privacy of Personal Information) Act, 2003 and this Privacy Policy.

### Access to Personally Identifiable Information

If your personally identifiable information changes, you must inform us accordingly; please e-mail us client:support@aaatrading.net

# **Legal Disclaimer**

AAA Trading reserves the right to disclose your personally identifiable information as required by rules and regulations and when the Firm believes that disclosure is necessary to protect our rights and/or to comply with any judicial and/or other proceedings, court order, legal process served or pursuant to governmental, intergovernmental and/or other regulatory bodies. AAA Trading shall not be liable for misuse or loss of personal information and/or otherwise on the Firm's sites that AAA Trading does not have access to or control over. AAA Trading will not be liable for unlawful or unauthorised use of your personal information due to misuse or misplacement of your passwords, negligent or malicious intervention and/or otherwise.

# **Changes in this Privacy Statement**

If we decide to change our privacy policy, we will post those changes to this privacy statement, the page, and other places we deem appropriate so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it.

We reserve the right to modify this privacy statement at any time, so please review it frequently. If we make material changes to this policy, we will notify you here, by email, or by means of a notice on our home page.

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# **Enquiries**

If you have any enquiries regarding the 'Privacy Policy' please e-mail client:support@aaatrading.net