

CopyleadTrader - TWM
Ltd.

Privacy Policy

Version: March 2023

Contents

1. TWM PRIVACY AND SECURITY POLICY COMMITMENT	
2. TWM COLLECT PERSONAL INFORMATION	
3. WHAT INFORMATION DOES TWM OBTAIN?	
4. HOW WILL TWM USE THIS INFORMATION?	
5. WHO MAY TWM DISCLOSE THIS INFORMATION TO?	
6. UPDATING YOUR INFORMATION.....	4
7. LINKS	4
8. COOKIES	5
9. SECURITY	5
10. WHAT ARE YOUR RIGHTS?	5
11. YOUR CONSENT	5
12. AMENDMENTS TO POLICY.....	5

TWM Ltd is committed to protecting the privacy of all personal information which it obtains from you, including the information obtained during your visits to this website or the provision of other services to you

1. **TWM LTD. PRIVACY AND SECURITY POLICY**

TWM Ltd. ("we", "us" or "TWM"), is a business company registered in Saint Lucia under registration number: 2023- 00068. We help traders and Introducing Brokers achieve their business goals and personal ambitions. Our business is built on integrity and trust, offering an industry leading combination of dynamic products, competitive trading parameters and premium, one- on-one service.

It is **TWM** 's mission to enable the personal ambitions and business goals of FOREX traders and IBs, through underpinning dynamic products with competitive trading parameters and a premium customer experience.

2. **COMMITMENT**

TWM is committed to protecting the privacy of all personal information which it obtains from you, including the information obtained during your visits to this website or the provision of other services to you. **TWM** will use your personal information in accordance with this Privacy and Security Policy and otherwise in accordance with the Privacy and Data Protection Act in Santa Lucia.

3. **TWM COLLECT PERSONAL INFORMATION**

TWM collects certain personal information in order that it may meet the needs of its customers. By collecting certain personal information, **TWM** can monitor and improve the services which it offers to its existing and potential customers . We will use this information for the following purposes: establishing and maintaining your account, providing our services to you, improving our services, regulatory notifications and marketing.

4. **WHAT INFORMATION DOES TWM OBTAIN?**

TWM will collect and hold information about you when you complete online application or another type of form or access and trade on your account through this website or another service, we provide to you. **TWM** may derive information from your use of this website or another service we provide to you and may store this information with your personal profile. This information may include site areas visited, pages viewed, frequency and duration of visits, types of transactions conducted, documents downloaded and other websites which may have referred you or to which you link.

5. **HOW WILL TWM USE THIS INFORMATION?**

TWM may use such information for any one or more of the following purposes:

- to provide the services to you that you have requested including processing transactions.
- to confirm your identity.
- to maintain your personal profile; to manage your account.
- 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 TWM .
- to manage and administer the products and services provided to you.
- to provide you with information regarding the products and services offered by TWM ; to develop an understanding of the products and services you may be interested in obtaining from TWM .
- to provide you with information or opportunities that we believe may be relevant to you.
- to tailor the website or other service we provide to you to your needs and interests; and
- to create anonymized statistical data.

You consent to TWM using your personal information for the above- stated purposes. You also consent to TWM transferring your information out of Saint Lucia where this is necessary for TWM to fulfill its contractual obligations to you. Please note that TWM only transfers personal information to organizations out of Saint Lucia if TWM has assessed the organization as having appropriate controls and safeguards in place to protect your personal data.

6. WHO MAY TWM DISCLOSE THIS INFORMATION TO?

TWM may be required to provide your personal information to the regulator and government bodies from time to time. TWM also disclose your personal information to:

- financial institutions and other similar organizations that deals within the course of its corporate activities, or those that are nominated by you.
- external service providers and professional advisers (which may be located overseas) that provide services to TWM .
- any organization at your request or any persons acting on your behalf, including your financial adviser, broker, solicitor or accountant.
- any third parties where this is necessary to process a transaction or provide services which you have requested; or
- any authority to whom TWM is required to disclose such information law. Please note that TWM does not sell or provide your information to third parties for personal purposes.

7. UPDATING YOUR INFORMATION

You may inform TWM at any time that your personal details changed or that you wish TWM delete personal information we have about you by emailing us. TWM 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.

8. LINKS

When you use this website or other service we provide to you, you may be able to link to other websites. This Privacy Policy does not apply to those sites. TWM encourages you to read the privacy policies on such sites.

9. COOKIES

TWM uses cookies to gather information about your access to this website and other services we provide to you. Cookies are small pieces of information which use a unique identification tag and are stored on your device as a result of you using this website or other service, we provide to you. When cookies are used by us, they collect statistical and information about how you use our services. Most internet browsers are set up to accept cookies. If you do not wish to receive cookies, you may be able to change the settings of your browser to refuse all cookies or to have your computer notify you each time a cookie is sent to it, and thereby give yourself the choice whether to accept it or not. However, this may impair the quality of the services that we provide to you in relation to your account.

10. SECURITY

TWM takes security very seriously and adopts industry and information security best practices to protect your personal information and ensure it is not accessed by unauthorized persons. Measures include encryption of data during transmission, strong authentication mechanisms and secure access to machines and data

11. WHAT ARE YOUR RIGHTS?

You need not give us any of the personal information requested by **TWM**. However, without that information, **TWM** may be unable to open an account for you, where the information is requested in an application form, or to provide you with any other services, information or assistance you have sought. Should you have any questions or complaints about your privacy please contact us. If a complaint is not resolved by **TWM** to your satisfaction, you may complain to the Information Commissioner.

Under data protection legislation, you have (subject to certain exceptions) the right to obtain copies of any personal information which **TWM** holds about you and to inform **TWM** of any inaccuracy.

If you have a request, please contact us to obtain a subject access request form.

We may charge a nominal fee to cover the cost of verifying the application and locating, retrieving, reviewing and copying any material requested.

12. YOUR CONSENT

By accessing this website or other service we provide to you, you consent to **TWM** collecting, maintaining, using and disclosing personal information about you and provided by you or by another person as described above.

13. AMENDMENTS TO POLICY

TWM may make changes to this Privacy and Security Policy from time to time for any reason and will notify you of such changes by posting an updated version of this policy on this website. You are responsible for regularly reviewing this Privacy and Security Policy and if you use this website or other service, we provide to you after any changes are published, any such use shall constitute your agreement to those changes.