

Privacy Statement

For purposes of this Privacy Policy, the terms "we," "us," and "our" refer to Mt.Cook Financial and/or all parent companies and affiliates of said company (hereinafter "MT.COOK"). MT.COOK is the website name for the underlying company Atlantic Pearl Ltd. "You" and "your" refers to you, as a user of the www.MT.COOKfinancial.com site. The Privacy Policy below governs your Information you provide on this site. Your account will be governed by this Privacy Policy. Your privacy is assured by MT.COOK and for all of our clients and enquiries made by perspective clients. We are advocates of privacy, so would not compromise the privacy of anyone when we in fact wish to teach privacy and protect privacy. Protecting the privacy and safeguarding the personal and financial information of our clients and website visitors is one of our highest priorities. The following Privacy Statement explains how we collect and protect your information. By opening an account or by using our website, you give your consent to the collection and use of personal information by us in limited use as explained in this privacy statement.

Legality of Processing / Access to the Website and Services

This Policy must be accepted by any User who wants to access the Website and/or use our Services and this includes each time the Confidentiality Policy is modified. If the Confidentiality Policy is not accepted, the User must forego access to the services offered by the Website and, if applicable, the MT.COOK Services.

Since the processing of Data is necessary for use of the MT.COOK Services, the Client expressly authorises MT.COOK to perform this processing as described in this Confidentiality Policy when he or she applies to use the Services.

Data Controller

The Data controller is Atlantic Pearl Ltd. (Trading as: MT.COOK Financial). The company Atlantic Pearl Ltd., holds its registered office at 8 Copthall, Roseau Valley, Roseau, The Commonwealth of Dominica.

Contact

To exercise one of your rights in this Confidentiality Policy, or for any questions you have, you may contact us at the following coordinates:

PHONE (EU): + 386 (1) 600-1626

PHONE (US): + 1 (866) 672-8733

FAX: +1 (866) 672-8733

BUSINESS OFFICE AND COURIER

Cesta prvih borcev 11,
8250 Brezice, Slovenia

EMAILS

General Inquiries: info@mtcookfinancial.com

Accounts: accounts@mtcookfinancial.com
Compliance: compliance@mtcookfinancial.com
Partnerships: partners@mtcookfinancial.com

Data We Collect

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes: first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes: billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes: bank account; source of funds, source of wealth; payment card details.
- **Transaction Data** includes: details about payments to and from you and other details of products and transactions you have placed via our Services and/or products.
- **Technical Data** includes: internet protocol (IP) address (for FIX connections and online portal and trading platforms), your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes: your username and password, transactions or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes: information about how you use our products and services.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific feature/ product or service we provide.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

How We Collect Data

We use different methods to collect data from and about you including through:

- **Direct interactions:** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply for our products or services;

- create an account with us;
- Third parties or publicly available sources: We may receive personal data about you from various third parties and public sources, as set out below:
 - Technical Data from the following parties:
 - (a) analytics providers such as Google based outside the EU;
 - (b) advertising networks
 - (c) search information providers
 - Contact, Financial and Transaction Data from providers of technical, payment and delivery services
 - Identity and Contact Data from data brokers or aggregators
 - Identity and Contact Data from publicly available sources, such as Companies House or equivalent
 - Online identity verification tools

How We Use the Data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting the Compliance Department.

Purpose for Using Your Data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact the Compliance Department if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of Data	Lawful basis for processing including basis of legitimate interest
To register as a new client	- Identity documentation – Contact details	- Performance of a contract with you – Necessary to comply with regulatory obligations
To process and deliver your order including; managing payments, fees, charges and	- Identity documentation – Contact details – Financial information	- Performance of a contract with you – Necessary for our legitimate

collect monies owed to us	- Transaction details	interests
To manage our relationship with you which will include: Notifying you about changes to our terms	- Identity documentation - Contact details	- Performance of a contract with you - Necessary to comply with regulatory obligations - Necessary for our legitimate interests
To administer and protect our business	Identity documentation - Contact details	- Necessary to comply with regulatory obligations - Necessary for our legitimate interests
To use data analytics to improve our products/services, customer relationships and experiences	- Technical - Usage	Necessary for our legitimate interests

Promotions

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing). You may receive marketing communications from us if you have requested information from us or opened an account with us and you have not opted out of receiving such communication.

Third Party Marketing

We will obtain your express consent before we share your personal data with any company outside MT.COOK for marketing purposes.

Opting Out

You can ask us to stop sending you marketing messages at any time by emailing the compliance@mtcookfinancial.com. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service, warranty registration, product/service experience or other transactions.

Disclosure of Personal Data

We may have to share your personal data with the parties set out below for the purposes set out in the table above.

- Internal Third Parties as set out in the Glossary of this notice.
- External Third Parties as set out in the Glossary of this notice.
- Third parties to whom we may choose to transfer, or merge parts of our business or our assets.

If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Cookies

MT.COOK may use cookies and other services for analyzing traffic on the Website in order to facilitate the User's navigation on the Website and optimise the technical management, offer the User targeted advertising adapted to their areas of interest and to create visit statistics. A cookie is a small information file saved by a website on the User's computer. This cookie can be re-used during a future visit to the same website. A cookie cannot be read by any website other than the one that created it. Most cookies are only valid for the duration of a session or visit.

No cookie can contain information that allows the User to be contacted by telephone, email or post. Most browsers are set to accept cookies automatically.

However, it is possible for the User to configure their browser to be informed each time a cookie is created or to prevent them from being saved.

Types of cookies used

MT.COOK uses one or more of the following types of cookies:

- the cookies required for operation of the Website, for example authorising the User to remain connected to their account;
- cookies monitoring use of the Website in order to generate statistical reports on the use of the Website, without identifying the individual Users of the Website;
- cookies required for the correct and efficient operation of the Website, including cookies allowing the Website to save User preferences;
- cookies monitoring User behaviour in order to communicate about offers or promotions.

What to do if you do not want cookies?

If you do not want the Website to store cookies on your computer, you have the choice to block the cookies (in other words configure your browser to refuse all cookies) and/or delete the cookies that have already been placed on your computer:

- on **Google Chrome**, you can block all cookies by clicking on "Personalise and control", then "Parameters", "Display advanced parameters" and "Content parameters" "Cookies and site data" under the heading "Cookies".
- on **Firefox**: you can block all cookies by clicking on "Tools", "Options", "Privacy", selecting "Use custom settings for history" from the drop-down menu and de-selecting "Accept third-party cookies";

- under **Internet Explorer**: you can block cookies by using the parameters to change the processing of cookies by clicking on “Tools”, “Internet Options”, “Confidentiality” and then on the button “Advanced”;

Bear in mind, however, that when you deactivate some cookies, some functions may no longer be available on the Website.

International Data Transfers

We share your personal data within MT.COOK and with international service providers. This may involve transferring your data outside of our default storage areas. We ensure your personal data is protected by requiring all companies to follow the same rules when processing your personal data as set out in this policy. Whenever we transfer your personal data out of our default storage areas, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguard is implemented: – Where we use certain service providers, we may use specific contracts based on the contents of this notice.

Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Data Retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers. In some circumstances you can ask us to delete your data: see Request erasure below for further information.

Your Legal Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

- Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully

processing it.

- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - (a) if you want us to establish the data's accuracy;
 - (b) where our use of the data is unlawful but you do not want us to erase it;
 - (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact our Compliance Department. You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What We May Need from You

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time Limit to Respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Glossary

Lawful Basis

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Third Parties

Internal Third Parties

Other companies owned by or affiliated with MT.COOK [acting as joint controllers or processors] and who may be based in other jurisdictions, and provide IT and system administration services.

External Third Parties

- Service providers [acting as processors] who may be based in other jurisdictions and who provide IT and system administration services and client services relations management.
- Professional advisers [acting as processors or joint controllers] including lawyers, bankers, auditors and insurers based in the EU who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities [acting as processors or joint controllers] who may be based in other jurisdictions, who require reporting of processing activities in certain circumstances.

Changes to this Privacy Policy

From time to time, we may update this Privacy Statement and Policy. In the event we materially change this Privacy Statement, the revised Privacy Statement will promptly be posted to our Web site(s). We may also amend this Privacy Policy at any time and from time to time. The updated versions of the

amended Privacy Policy will always be posted to our website so that you will always be aware of how we manage your personal information.

Questions

MT.COOK is committed to transparency and integrity, and are always willing to assist in helping potential participants understand various topics and make well informed decisions. Please do not hesitate to contact MT.COOK at www.mtcookfinancial.com/contact/ for any further questions or clarifications.

Mt. Cook Financial