

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 Atlantic Pearl Ltd. "You" and "your" refers to you, as a user of the www.mtcookfinancial.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 Web site 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 Web site, you give your consent to the collection and use of personal information by us in limited use as explained in this privacy statement. Please take note of the following;

- We do not sell banner advertising or have any reason to collect data for this reason.
- We do not sell our email contacts, they are all kept confidential.
- MT.COOK shall keep in-house control over any CGI forms, so you cannot receive spam or contact from the service provider.
- We do not seek "cookies" for the purposes of tracking your browsing.
- Personal client data handled by MT.COOK is always handled professionally according to our compliance terms. It is kept in hard copy and shall also always be encrypted, sent and stored offshore in a safe environment.

Collection of Personal Information

We collect information required to open an account, to transact business effectively and to safeguard your assets and your privacy. To do this, we gather information to help us assess your needs and preferences and suitability for participation.

The information we collect directly from you includes information required to communicate with you, including your name, mailing address, telephone number, e-mail address and documentation to identify who you are. We also collect demographic information when you open an account, including, birth date, education, occupation, etc. We also assess your trading experience, your approximate annual income and approximate net worth to assess your financial position.

Usage of personal information

We use personal information only as appropriate to provide you quality service and security. For example, we may use the information collected from you to verify your identity and contact information. We may also use this information to establish and set up your trading account, issue an

account number and a secure password, maintain your account activity, and contact you with account information. This information helps us improve our services to you, customize your browsing experience and inform you about additional products, services or promotions that may be of interest to you.

Protecting the Confidentiality of Your Personal Information

All MT.COOK employees are instructed to use strict standards of care regarding the confidentiality of your nonpublic personal information as outlined in our policies. Employees not adhering to our firm policies are subject to disciplinary action. We may further require outside companies and independent contractors to whom we provide customer information for marketing, servicing or processing to enter into a confidentiality agreement that restricts the use of the information to those purposes. We maintain physical, electronic and procedural safeguards that comply with applicable laws to protect your non-public personal information.

Our affiliates and partners

We may share information with affiliates if the information is required to provide the product or service you have requested or to provide you the opportunity to participate in the products or services our affiliates offer. We may also forge partnerships and alliances, which may include joint ventures, or marketing agreements with other companies who offer high-quality products and services that might be of value to our clients. In order to ensure that these products and services meet your needs and are delivered in a manner that is useful and relevant, we may share some information with partners, affiliates and alliances. This allows them to better understand the offers that are most relevant and useful. The use of your personal information is limited to the purposes identified in our relationship with the partner or affiliate.

Non-affiliated third parties

We do not sell, license, lease or otherwise disclose your personal information to any third party for any reason, except as described below.

We reserve the right to disclose your personal information to third parties where required by law to regulatory, law enforcement or other government authorities. We may also disclose your information as necessary to credit reporting or collection agencies, or when necessary to protect our rights or property. To help us improve our services to you, we may engage another business to help us to carry out certain internal functions such as account processing, fulfillment, client service, client satisfaction surveys or other data collection activities relevant to our business. We may also provide a party with client information from our database to help us to analyze and identify client needs and notify clients of product and service offerings. Use of the information shared is strictly limited to the performance of the task we request and for no other purpose. All third parties with which we share personal information are required to protect personal information in a manner similar to the way we protect personal information.

Restriction of responsibility



If at any time you choose to purchase a product or service offered by another company, any personal information you share with that company will no longer be controlled under our Privacy Statement. We are not responsible for the privacy policies or the content of sites we link to and have no control of the use or protection of information provided by you or collected by those sites. Whenever you elect to link to a co-branded Web site or to a linked Web site, you may be asked to provide registration or other information. Please note that the information you are providing is going to a third party, and you should familiarize yourself with the privacy policy provided by that third party.

Opting out of disclosures of non-public personal information

You may direct us not to disclose non-public personal information to certain non-affiliated third parties. To opt out of sharing non-public personal information with non-affiliated third parties, please contact a client service representative. An opt out election made by one account owner of a joint account is applicable to all account owners of the joint account. An opt-out election must be made for each separate account you hold with us.

Sensitive information

Sensitive information encompasses information or an opinion about an individual's racial or ethnic origin, political opinions, membership of political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preference or practices, criminal record or health information about an individual. The MT.COOK website will not ask users to provide MT.COOK with sensitive information. If a user provides MT.COOK with sensitive information, MT.COOK will deal with such information in accordance with the appropriate provisions.

Security and Retention policies

MT.COOK is committed to ensuring the security of personal information that we hold about you. We take reasonable steps to ensure the personal information we hold about you is stored securely, whether in a physical or electronic form. If you use the Internet to communicate with us you should be aware that there are inherent risks in transmitting personal information over the Internet. MT.COOK does not have control over the transfer of personal information over the Internet and we cannot guarantee its security. Any personal information we no longer require may be destroyed. An exception to this may be where records are required to be retained by law.

Use of "cookies"

Although presently not used right now, we may in the future use cookies to assist us in securing your trading activities and to enhance the performance of our web site, or for partnership tracking of applications, but will never be used to track your browsing as indicated above (cookies are small text files sent from the web server to your computer.) 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 shall never contain any personally identifiable information.

Communications

Unless otherwise indicated for a particular service, any communications or material of any kind that you e-mail or otherwise transmit through the services, including information, data, questions, comments or suggestions (your "Communications") will be treated as non-proprietary and non-confidential. By acknowledging this policy as part of the client services agreement, you grant a license to us to use your Communications in any way we think fit, either on the Web site or elsewhere, with no liability or obligation to you. We are free to use any idea, concept, know-how or technique or information contained in your Communications for any purpose including, but not limited to, developing and marketing products.

We are entitled, but not obligated, to review or retain your communications

We may monitor your communications to evaluate the quality of service you receive, your compliance with this policy, the security of the web site, or for other reasons. You agree that such monitoring activities will not entitle you to any cause of action or other right with respect to the manner in which we monitor your communications with us. In no event we will be liable for any costs, damages, expenses or any other liabilities incurred by you as a result of our monitoring activities.

Failure to Provide Personal Information

You have a choice to supply any or all of the personal information required. However, missing or incomplete information may result in our being unable to open or maintain your account and /or to provide you with our services.

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.