Regulated by the Cyprus Securities and Exchange Commission (Licence No. 215/13)

TF GLOBAL MARKETS (EUROPE) LTD

Privacy Policy

Document	Privacy Policy
Entity	TF Global Markets (Europe) Ltd
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Contact

compliance.eu@thinkmarkets.com
www.thinkmarkets.com/eu

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PRIVACY POLICY

1. Introduction

The Privacy Policy of the TF Global Markets (Europe) Ltd (hereinafter, "the Company", "ThinkMarkets") applies to existing and potential Clients as well as to any person visiting any website operated by the Company. ThinkMarkets is responsible for protecting the privacy of all Personal Data it acquires, and for managing the protection of privacy and the safekeeping of Clients 'personal and financial information. The Company strives to protect the confidentiality, security, and integrity of your information.

The Company is committed to protecting your privacy and Personal Data. In this Privacy Policy we explain what information we collect when you use our services, why we collect this information and how we manage this information. It is our policy to respect the confidentiality of Personal Data and the privacy of individuals. We are bound by the General Data Protection Regulation (GDPR (EU) 2016/679) and relevant laws and regulations.

We may periodically make changes to this Privacy Policy and will notify you of these changes by posting the modified terms on our website. In case of doubt, Personal Data we collect and hold is governed by the current version of this Privacy Policy on our website at the relevant time, we recommend that you revisit this Privacy Policy regularly. 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.

It is important that you read this Private Policy together with any other policy statement or fair processing notice we may provide on specific occasions when we are collecting or processing Personal Data about you. This ensures that you are fully aware of how and why we are using your data. This Private Policy supplements the other notices and is not intended to override them.

This website is not intended for children and we do not knowingly collect data relating to children.

2. Collection of Personal Data

Use of your Personal Data

By using or navigating the Website, or by utilizing any product or service, opening an account with us, you acknowledge that you have read, understood, and agreed to be bound by this Privacy Policy. You should not provide us with any of your information if you do not agree with the terms of this Privacy Policy.

- As part of providing our services, for the performance of a contract with you, or to take steps to enter into a contract;
- For compliance with our legal obligations, requested by CySEC or any other regulatory authority having control over the Company;
- We may also collect your Personal Data in regard to your use of our website(s), such as pages visited, frequency, duration of visit and trading activities, through cookies.
- We may also collect and process non-personal, anonymised data for statistical purposes and analysis and to help us provide better services. Participation in these surveys is completely voluntary, and, therefore, you have the choice to consent on disclosing such information
- We may collect your name and contact details (such as your email address, phone number or address) in order to send you information about our products and services which you might be interested in. We may collect this directly from you, or through a third party. If a third party collected your name and contact details, they will only pass those details to us for marketing purposes if you have consented to them doing so. If you do not wish to receive this information, please contact us by emailing our customer service team at support@thinkmarkets.com.
- We may also collect and process the following special categories of data such as information about criminal convictions and offences.
- We have the legal obligation to record, monitor and process any telephone conversations and/or electronic communications between us such as through fax, email, social media, electronic messages, either initiated from the Company's side or your side. All such communications are recorded and/or monitored and/or processed by the Company, including any telephone conversations and/or electronic communications that result or may result in transactions or client order services even if those conversations or communications do not result in the conclusion of such transactions.
- We collect information about visitors to our premises. We may record information on your visit, including the date and time, who you are visiting, your name, employer, contact details and vehicle registration number.

Disclosure of Personal Data

We collect, use, disclose, transfer and store your Personal Data when required to provide our services and for our operational and business purposes as described in this Private Policy. ThinkMarkets does extensive due diligence before choosing processors. Our processors provide sufficient guarantees that they implement appropriate technical and organisational measures in such a manner that processing will meet the requirements of the GDPR and ensure the protection of the data subjects rights. The adherence of our processor(s) to approved code(s) of conduct, besides the Agreement/Contract or an approved certification mechanism, is used as an element to demonstrate compliance with the obligations of the controller. We ensure that any contract signed between us and our processors is binding as per applicable legislation.

We may disclose your Personal Data if required to do so by law, or if we believe to be necessary or appropriate according to our contractual relationship:

- comply with any legal process served on us or in circumstances where we are under a substantially similar legal or regulatory obligation, which may include laws and regulations outside your country of residence;
- where required by law or a court order by a competent Court;
- where requested by our Supervisor (the Cyprus Securities and Exchange Commission) or any other regulatory, public and government authority having control or jurisdiction over us or you or our associates or in whose territory we have clients or providers, as applicable from time to time;
- to our professional advisors provided that in each case the relevant professional shall be informed about the confidential nature of such information and commit to the confidentiality herein obligations as well;
- act to protect the personal safety of users of the services or the public. If, in our sole determination, you are found to have cheated or attempted to defraud us, our Affiliates, or any other user of the Services in any way including, but not limited to, price manipulation or payment fraud, including use of stolen credit cards, or any other fraudulent activity (including any chargeback or other reversal of a payment) or prohibited transaction (including money laundering);
- to data reporting service providers;
- to our affiliates.
- To financial CFD providers, banks and other credit institutions, credit card companies, and appropriate regulatory and legal agencies

Categories of Personal Data:

The Personal Data that we collect from you depends on the particular activities carried out through our website and the provision of services. This information includes:

- **Identity Data** includes first name, maiden name, last name, proof of identity, username or similar identifier, marital status, title, date and place of birth and gender, country of residence and citizenship.

- **Contact Data** includes billing address, delivery address, email address and telephone numbers proof of address.
- **Professional Data** includes level of education, profession, employer name, work experience in Forex/CFD's, information on Client's experience, knowledge in forex industry and risks.
- **Tax Data** include country of tax residence and tax identification number.
- **Financial Data** includes annual income, net worth, source of funds, anticipated account turnover, bank account, bank statements, payment card details and copies, E-wallet information.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us, deposit methods, purpose of transactions with us.
- **Technical Data** includes internet protocol (IP) address, 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, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

Failure to provide Personal Data

We need to collect your Personal Data as part of statutory obligations or as part of the contractual arrangements we have with you. If you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

Safeguard Measures

We always take appropriate technical and organisational measures to ensure that your information is secure to ensure your Personal Data is protected from misuse, interference or loss, and unauthorised access, modification or disclosure. Your Personal Data is generally stored in our computer database. Any paper files are stored in secure areas. In relation to information that is held on our computer database, we apply the following guidelines:

- passwords are required to access the system and passwords are routinely checked;
- data ownership is clearly defined;
- employees have restricted access to certain sections of the system;
- the system automatically logs and reviews all unauthorised access attempts;
- unauthorised employees are barred from updating and editing Personal Data;

- all computers which contain Personal Data are secured both physically and electronically;
- data is encrypted during transmission over the network; and
- print reporting of data containing Personal Data is limited.
- implemented appropriate organizational measures and policies and risk assessments.
- training of our employees who handle Personal Data to respect the confidentiality of Client information and the privacy of individuals.

We regard breaches of your privacy very seriously and will impose appropriate penalties, including dismissal where necessary.

Data Retention

We will only retain your Personal Data for as long as we reasonably require it for legal or business purposes subject to a maximum of seven (7) years. In determining data retention periods, we take into account the applicable legal requirements, contractual obligations, and the expectations and requirements of our customers. When we no longer need Personal Data, we securely delete or destroy it. Please refer to our Data Retention Policy for more information on our Personal Data retention schedule.

For further information on our retention and destruction processes, you may request a copy of Our Data Retention Policy via email at compliance.eu@thinkmarkets.com

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that you can still access this website and it will function properly. Cookies are used on this website in order to offer our users a more customized browsing experience.

For more information about the cookies we use, please see our Cookie Policy.

Change of Purpose

We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please Contact us.

If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your Personal Data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Change of Control

If there is a change of control/ownership at TF Global Markets (Europe) Ltd (e.g., in the course of a transaction like a merger, acquisition, bankruptcy, dissolution, liquidation), your Personal Data may be transferred accordingly.

You will not lose access to your account(s) or the right to claim any of your rights under this Privacy Policy. The new controllers will be required to abide to the requirements of this Privacy Policy.

3. Transfers of data outside the EU / EEA

If your data will be transferred to entities or other third parties whose headquarters or place of data processing is not located in a member state of the European Union or the European Economic Area, we ensure before forwarding the data that, outside of legally permitted exceptional cases pertaining to the recipient, either an appropriate level of data protection exists (e.g., through an adequacy decision of the European Commission, through suitable guarantees, or the agreement of EU Standard Contractual Clauses between us and the recipient), or your sufficient consent exists.

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.

4. Your rights relating to your Personal Data

As a data subject, you can contact us at any time with a notification to make use of your rights. These rights are the following:

- The right to receive information about the data processing and a copy of the processed data under certain conditions.
- The right to demand the rectification of inaccurate data or the completion of incomplete data under certain conditions.
- Subject to some exceptions, the right to demand the erasure of Personal Data under certain conditions.
- Subject to certain conditions, the right to demand the restriction of the data processing under certain conditions.
- Subject to certain conditions, the right to receive the Personal Data concerning the data subject in a structured, commonly used and machine-readable format and to request the transmittance of these data to another controller under certain conditions.
- Subject to certain conditions, the right to object to the data processing under certain conditions.
- The right to withdraw a given consent at any time to stop a data processing that is based on your consent.

For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the Office of the Commissioner for Personal Data Protection.

If you still feel that your Personal Data has not been handled appropriately according to the law, you can submit your complaint with the Office of the Commissioner for Personal Data Protection, at 1 Iasonos Street, 2nd Floor, 1082 Nicosia, tel. +357 22 818456, email address commissioner@dataprotection.gov.cy.

5. Automated decision-making and profiling

In order to perform the contract between us and as authorized by the relevant regulations [Directive 2014/65/EU MIFID, Law 87(i)/2017 and Circular 168 and 028 of Cyprus Securities and Exchange Commission] it is requested for the provision of the investment services to you and once per calendar year thereafter, to assess your knowledge and experience, your financial situation and investment objectives and your risk profile. We fulfil the above requirements through the following tools:

Appropriateness Test: it takes place when you require to register as client of the Company. Hence, we need to check and ensure that you are suitable for the provision of the Company's services and products by taking an appropriateness test in regards to your knowledge, financial background and experience in regards to financial services. Based on the scoring you receive, you will be informed whether you are eligible to receive our services and become our Client and the maximum level of leverage you are eligible to. The reason for assessing your appropriateness is to enable the Company to offer to you services suitable to you and act in the Client's best interest.

The scorings above are monitored by the Company's Compliance department and you may see your results and an explanation of the scoring or to challenge the decision by sending an email to compliance.eu@thinkmarkets.com. During these processes, the Company takes all the technical and operational measures to correct inaccuracies and minimize the risk of errors, to prevent any discrimination and to secure Personal Data of the client.

6. Queries and Contact

If you have any questions which have not been covered in this Privacy Policy, or any further concerns regarding the use of Personal Data, please do not hesitate to Contact us.

7. Glossary

"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.

"GDPR": shall mean the EU General Data Protection Regulation 2016/679;

"Legitimate Interest": shall mean 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 p 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). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by Contacting us.

"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.

"Personal Data": means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person

"Personal data breach": means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Personal Data transmitted, stored or otherwise processed;

"Profiling": means any form of automated processing of Personal Data consisting of the use of Personal Data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements;

"Third Parties": shall mean external third parties and specific third parties;

As **External Third Parties** we shall mean:

- Service providers [acting as processors] based in Cyprus such as IT and system administration services.
- Professional advisers [acting as processors or joint controllers] including lawyers, bankers, auditors and insurers based in Cyprus and in the European Union in general who provide consultancy, banking, legal, insurance and accounting services.
- Regulators and other authorities [acting as processors or controllers] based in the Republic of Cyprus and other authorities and regulators in the European Union who require reporting of processing activities in certain circumstances.

As **Specific Third Parties** we define the following:

- Supervisory and other regulatory and public authorities, in as much as a statutory obligation exists. This may include disclosures to the Cyprus Securities and Exchange Commission, tax authorities, European Securities and Markets Authority and the European Banking Authority, the Cyprus Central Bank, criminal prosecution authorities all of them located within EU [Controllers of personal data];
- Investors Compensation Fund within EU [Controllers of personal data];
- External compliance companies within EU [Processors of data];
- IT and trading platforms administration providers within EU [Processors of Data];
- Translating Agencies within EU and out of EU [Processors of Data];
- Communication Support Services within EU and out of EU [Processors of Data]
- Professional firms within EU [Processor of Data];
- Auditors within EU [Processors of Data];
- Card payment processing companies and payment service providers within EU [Controller of Data];
- Cloud storage companies within EU [Processors of Data]