

Privacy Policy

1. Privacy

TradeConnect Limited is committed to protecting your personal information. We have created this Privacy Policy to let you know 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 information and the privacy of individuals.

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 Information 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.

2. Why do we collect information?

To deliver our services (including the offer of ThinkCoins through our Initial Coin Offering) to you (“our **Services**”), we must collect some personal information from potential participants, participants, visitors to our website, service providers and suppliers.

3. Information collected

Information that may be used to identify an individual, including, but not limited to, first and last name, date of birth, home or other physical address, email address, phone number or other contact information is your personal information (**'Personal Information'**). You may be asked to provide Personal Information when you use our website, register for interest in our products and offers, apply to participate in our Initial Coin Offering or utilise our services.

The Personal Information that we collect and hold may include:

- your full name;
- contact information (including telephone number);
- date of birth;
- identification details such as passport or driver's licence details;
- employment details;
- address;
- proof of address such as utility bills and bank statements;
- financial information;
- trading experience;
- transaction history;
- bank details; and
- other personal information we require to meet your needs and provide our services to you.

This information is held by us on servers. In addition, when you interact with our services, our servers may keep an activity log unique to you that collects certain administrative and traffic information including: source IP address, time of access, date of access, web page(s) visited, language used, software crash reports and type of browser used. This information is essential for the provision and quality of the services.

4. Management of personal information

We recognise the importance of securing your personal information and the privacy of individuals. We will take steps to ensure your personal information is protected from misuse, interference or loss, and unauthorised access, modification or disclosure. Your personal information 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 will be required to access the system;
- 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 information;
- all computers which contain personal information are secured both physically and electronically;
- data is encrypted during transmission over the network; and
- print reporting of data containing personal information is limited.

5. Means of collecting and processing personal information

We generally collect personal information directly from you. For example, personal information will be collected through our application processes, forms and other interactions with you in the course of providing you with our Services, including when you visit our website, call us or send us correspondence. We will only use the Personal Information as set out in this Privacy Policy. We will not retain or have access to any debit/credit card information. We will not collect sensitive information about you without your consent unless the collection is required or authorised by law or necessary to take appropriate action in relation to suspected unlawful activity or serious misconduct.

If you do not provide us with the Personal Information we request, we may not be able to provide you with our products or Services, or meet your needs appropriately.

We are likely to disclose your Personal Information to our affiliates TF Global Markets (Aust) Pty Ltd in Australia and TF Global Markets (UK) Limited in the UK. We also use cloud data storage providers, which means your Personal Information will be stored on servers that may be located overseas. We will not disclose your personal information to overseas recipients without your consent unless we have taken reasonable steps to ensure that the recipient does not breach relevant and applicable data protection rules and regulations.

We may also collect personal information about you from a third party, or share information with a third party, such as identity verification services, regulators, marketing agencies, online vendors, service providers and from customer lists lawfully acquired from third parties. In addition, we may engage the services of third-party service providers to provide technical support, process your transactions and maintain your account or relationship with us. We take steps to ensure that our arrangements with third-party service providers and online vendors protect your privacy. Any personal information will only be disclosed to third parties in accordance with this Privacy Policy.

6. Information use

We use the Personal Information we collect from you to deliver our Services, to provide client support, to undertake necessary security and identity verification checks, to comply with relevant laws and

regulations and other legal obligations, to process any of your transactions, to assist your participation in third-party promotions, meet certain business requirements and for any other purpose related to the operation of the Services. Your personal information may also be used by us to provide you with promotional offers and information regarding our products and services and in order for us to better provide a range of products and services and improved service. From time-to-time, we may request information from you via surveys or contests. Participation in these surveys or contests is completely voluntary, and, therefore, you have the choice of whether to disclose such information. Information requested may include contact information (such as name, correspondence address and telephone number), and demographic information (such as postal code or age).

7. Certain excluded disclosures

We may disclose your personal information if required to do so by law, or if we believe in good faith that such action is necessary to: (1) comply with any legal process served on us or in circumstances where we are under a substantially similar legal or regulatory obligation; (2) protect and defend our rights or property; or (3) 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, manipulation or payment fraud, or any other fraudulent activity or prohibited transaction (including money laundering), we reserve the right to share this information (together with your identity) with other financial product providers, banks, credit card companies, and appropriate regulatory and legal agencies.

8. How do we keep your personal information accurate and up to date?

We endeavour to ensure that the personal information we hold is accurate and up to date. We realise that this information changes frequently with changes of address and other personal circumstances. Please contact us at support@thinkcoin.io with any changes to your personal information that we hold.

9. You have the right to check what personal information about you is held by us

You have the right to obtain a copy of any Personal Information which we hold about you and to advise us of any perceived inaccuracy. To make a request, please write to us at support@thinkcoin.io, verifying your identity and specifying what information you require.

10. What if you have a complaint?

If you consider that any action of ours breaches this privacy policy statement or otherwise doesn't respect your privacy, you can make a complaint. This will be acted upon promptly. To make a complaint, please e-mail us at support@thinkcoin.io.

11. Opting out

You may 'opt out' of receiving any promotional communications either by choosing to opt out where such option is made available on our website or in an email you receive from us, or at any time by sending an email to support@thinkcoin.io. Please allow seven (7) days for your request to be processed.