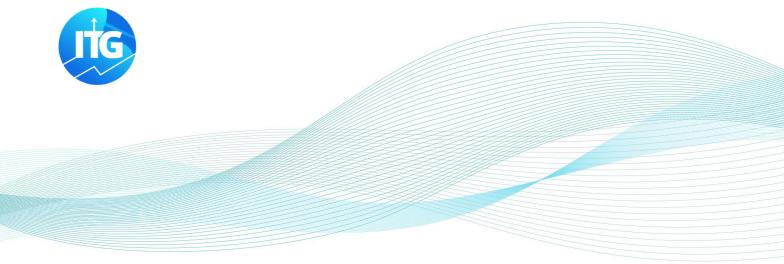


Privacy Policy



Privacy Policy

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 Policy explains how ITG Traders ("ITG Traders Ltd") treats your personal information. By opening an ITG Traders Ltd account or by using ITG Traders Ltd's websites, you give your consent to the collection and use of personal information by ITG Traders Ltd in accordance with this Privacy Policy.

Personal information

"Personal information", as defined in the Privacy Act 1988 (Cth), refers to "information or an opinion, whether true or not, and whether recorded in a material format or not, about an identified individual, or an individual who is reasonably identifiable". Any information or opinion that may lead to the reasonable inference to the identity of an individual may be considered personal information.

Collection of and use of personal information

We collect your personal information for the main purpose of providing you with financial products and services that request. We collect your personal information directly from you and indirectly from third parties. ITG Traders Ltd may use the information collected from you to verify your identity and contact information, establish your trading account, issue you an account number and a secure password, maintain your account and contact you with account information, among other reasons. This information also helps us improve our services to you, customise your browsing experience and inform you about additional products, services or promotions that may be of interest to you.



You directly provide us with the majority of information we collect. This information may include your name, mailing address, telephone number and e-mail address, personal identification data such as your passport number, and information on your financial standing, trading experience and risk tolerance, such as your annual income, net worth and available capital. We may also collect demographic information when you open an account, including gender, birth date, occupation and employment status.

The information we collect indirectly from you includes your Internet protocol ("IP") address, browser type, operating system, Internet service provider (ISP), time stamps and transaction history.

Should you close your account with us, ITG Traders Ltd will retain your information to the extent required by law

Cookies

We use cookies and web beacons (also known as action tags or single-pixel gifs), and other technologies (collectively, "cookies") to provide us with data we can use to improve your experience and to know you better. Cookies are small text files sent from Web servers that may be stored on your computer. Cookies enable us to capture how you arrived at our site, when you return, which pages on our site you visit, and to recognise that you are already logged on when we receive a page request from your browser. We may link the information we store in cookies to personally identifiable information you submit while on our site. We will never share this information with any third party. Cookies are readable only by us and do not contain any personal information nor do they contain account or password information. We cannot and will not gather information about other sites you may have visited.

We may share usage information about visitors to our websites with reputable advertising companies for the purpose of targeting our Internet banner advertisements. The information collected by the advertising company by these pixel tags is not personally identifiable. We may also use third party software to track and analyse usage and volume statistical information including page requests, form requests and click paths. The third party may use cookies to track behaviour and may set cookies on behalf of ITG Traders Ltd.

All web browsers have settings that allow you to block cookies. By visiting our website with your browser set to allow cookies, you consent to our use of cookies as described above. If you choose to block cookies you may use our services but some functions may not work as designed.



Sharing personal information with ITG Traders Ltd affiliates and non-affiliated third parties

ITG Traders Ltd does not sell, license, lease or otherwise disclose your personal information to any affiliate or third party for any reason, except as described below.

ITG Traders Ltd 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.

To help us improve our services to you, we may engage another business to help us carry out certain internal functions, such as account processing, fulfilment, client service, client satisfaction surveys or other data collection activities relevant to our business. We may also provide a non-affiliated third party with client information from our database, including your name, address, phone number, and/or e-mail address, to help us analyse and identify client needs, notify clients of product and service offerings or conduct general marketing and market research for us.

ITG Traders Ltd also forges partnerships and alliances with non-affiliated third parties which offer high-quality products and services that might be of value to our clients. To ensure that these products and services meet your needs and are delivered in a manner that is useful and relevant, ITG Traders Ltd may share some personal information with these non-affiliated third parties.

We generally require that all non-affiliated third parties to which we provide your non-public personal information agree to keep your information confidential and use such information solely for the limited purpose for which we have engaged them, or as otherwise required by law. In addition, where offers are made to you by non-affiliated third parties, we generally require that they disclose that the offer is being extended because of your relationship with us. We also seek to ensure that these non-affiliated third parties maintain appropriate data security procedures to guard against unauthorised use of, or access to, your personal information.



When required by law, ITG Traders Ltd reserves the right to disclose your personal information to third parties or regulatory, law enforcement or other government authorities. We may also disclose your informa-tion to credit reporting or collection agencies, or when necessary to protect our rights or property.

If at any time you choose to purchase a product or service offered by another company, for example by clicking on an advertisement on a website owned or controlled by ITG Traders Ltd, any personal informa-tion you share with that company will no longer be controlled under our Privacy Policy. We are not respon-sible for the privacy policies or the content of sites we link to and we have no control over the use or protection of information provided by you to, or collected by, those websites. Whenever you elect to link to a co-branded website or to a linked website, 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 familiarise yourself with the privacy policy published by that third party.

The security of your personal information

We employ security software, systems and procedures to offer you a safe and secure trading environment and to protect your personal, financial and trading information.

When you open an account with us, you are issued a unique account number, User ID and a password. Only a limited number of ITG Traders Ltd employees who have a need to know this information will have access to your account number, User ID, and password. Remember that you are ultimately responsible for maintaining the secrecy of your account number, User ID and password. We strongly recommend that you do not disclose this information to anyone.

Access to your personal information

You may request to access information we hold about you. We rely on your information to provide financial products and services to you. We also have an obligation to be reasonably certain that the information we hold on file for you is accurate and up-to-date. Please contact us if you believe information we hold about you may be incorrect, inaccurate or out of date.



Changes to this Privacy Policy and opting out

In the event ITG Traders Ltd materially changes this Privacy Policy, the revised Privacy Policy will promptly be posted to our websites. By opening an account with us, you agree to accept posting of a revised Privacy Policy electronically on our website as sufficient notice to you.

Under certain circumstances, such as with respect to our sharing of your personal information with non-affiliated third parties, you may inform us that you would like to 'opt out' by contacting us through the contact information listed below. Note that for joint accounts, 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 at ITG Traders Ltd.

Any dispute over our Privacy Policy is subject to this notice and the ITG Traders Ltd Account Terms. If you have any questions that this Privacy Policy does not address, please contact a Client Services representative.

You may contact ITG Traders Ltd for any reason under this Privacy Policy, or otherwise, as follows:

ITG Traders Ltd

Suite 305, Griffith Corporate Centre Beachmont Kingstown St. Vincent and the Grenadines

Email: support@itgtraders.com

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