

# IP ADDRESS AND COOKIE POLICY

## THEX TRADE COMPANY LTD.

*[Last Updated: 31<sup>st</sup> October 2018]*

### Introduction

The privacy and security of your personal information is important to us. We implement the privacy concepts provided by the applicable laws and regulations including the General Data Protection Regulation (GDPR) to ensure that your Personal Data (as defined below) will be collected, processed, used and shared in the appropriate manner and in accordance with the purpose we set out as follows. For more information regarding your privacy please view our [Privacy Policy](#).

This IP Address and Cookie Policy (“**Policy**”) of **Thex Trade Company Ltd.** (the “**Company**,” or “**we**” or “**our**”) will govern our treatment of your personal data during the term and performance of services provided by us through our official website (www.thextrade.com) (“**Exchange**”), mobile application and other available platforms, our registration process for users, and our exchange portal services (collectively as our “**Services**” or “**Exchange**”). For the purpose of this Policy, “**Personal Data**” means any information relating to an individual who can be identified particularly by reference of certain information given by such individual as requested by the Company for specific purposes.

The Company collects two types of information about you:

1. Personal information, including your name and surname; and
2. Aggregate information, that generated from your Internet Protocol Address (“**IP Address**”) and the Cookies we have in place.

Please read the following carefully to understand how and why the Site and the Platform use your IP Address and cookies! If you do not accept or agree to the practices described in this Policy, you must exit both the Site as well as the Platform. Continued use will be deemed to amount to your full acceptance and consent.

### IP Address

#### 1.1 What happens when you visit the Site?

Your IP Address contains information regarding the location of your computer on the internet (your country of origin) and the name of your Internet Service Provider (“ISP”), is

automatically logged by the Site. This also applies when you access the Exchange via the Site.

### 1.2 What is an IP Address?

Once your computer connects to the internet, it is automatically assigned a unique number known as an IP Address. This address is your computer's address on the internet. Without such IP Address, websites would not be able to find your computer on the internet and, consequentially, would not be able to deliver their content to you. Because the IP Address is automatically regenerated each time you connect to the internet, they are not inherently capable of identifying you as an individual. Seeing as an IP Address contains certain information pertaining to the location of your computer, IP Addresses are considered personal data under EU law.

### 1.3 How do we collect your IP Address

Each time you visit a page on the Site, your computer requests content to be delivered. This request comes with your IP Address in order for our Site to know where to deliver the content. Our server automatically records these messages.

### 1.4 What do we do with your IP Address?

The IP Address is automatically gathered along with information relating to the browser being used, the ISP, the operating system, the date and time stamps, clickstream data and the pages viewed on the Site.

Once this information has been logged, the data collected is amalgamated with other logged information and in order to allow for a statistical analysis of the visitors to the Site; their geographic location, the duration spent on the Site, the pages viewed and other statistical reasons that may be relevant for Our business. It also allows us to administer the Site and the Platform, diagnose any potential server problems, analyse visitor trends and statistics, and generally helps us to provide you with a better internet experience.

IP Addresses are not stored for longer than necessary for the above stated purposes. Please refer to our Privacy Policy at <https://www.thextrade.com/legal/privacypolicy> for further information on retention periods and other rights in relation to personal data.

## **Cookies**

### 2.1 What are Cookies?

A cookie is a small amount of data, which often includes a unique identifier that is sent to your computer, tablet or mobile phone web browser from a website's computer and is stored on your device's hard drive. Each website can send its own cookie to your web browser if your browser's preferences allow it. This is often done to track online traffic flows.

## 2.2 How we use cookies

We use cookies that are essential in order to provide You with our services. Some cookies are essential for us to use in order to provide you with the services you have requested. These cookies will be used to manage the delivery of any web services requested by you and if you do not accept these cookies, these services may not be accessible and you may not be able to receive certain services that you have requested. These cookies do not gather information about you that could be used for marketing purposes or remembering where you have been on the internet.

We [may] use the following cookies:

- Strictly Necessary Cookies

These are cookies that are required for the operation of the Site and the Platform. Namely, by way of illustration, they include cookies that enable you to log into secure areas of the Site and the Platform and make use of certain functionalities (e.g. log-in and access to your personal account and portfolio on the Platform).

- Analytical and Performance Cookies

These cookies allow us to recognise and count the number of visitors and see how visitors move around the Site and the Platform when using it. This helps us to improve the way and manner in which the Site and the Platform work, such as by ensuring that users are finding what they are looking in a seamless and straightforward manner.

- Functionality Cookies

These are used to recognise you when you return to the Site and/or the Platform (as relevant). This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

- Targeting Cookies

These cookies record your visit to the Site and/or the Platform, the pages you have visited and the links you have followed. We will use this information to make the Site and the Platform, together with the advertising displayed on them, more relevant to your interests. We may also share this information with third parties for this purpose.

- Session Cookies

These cookies contain encrypted information to allow our system to uniquely identify you while you are logged in. Session cookies exist only during an online session. They disappear from your computer when you close your browser software. These allow us to process your requests and help us make sure you are who you say you are after you have logged in.

- Third Party Cookies

These cookies allow the Site and the Platform to interact with different websites and trading platforms.

You can find more information about the individual cookies we use and the purposes which we use them in the table below:

Cookie	Name	Purpose	More information
https:// www.thextrade.com	CAKEPHP	This cookie is essential for our site to enables us to make a double check about your details during your visit.	It is set to httpOnly. This options targets unauthorized third party access to the user's like attacks (Session Hijacking). This flag is not supported by all browsers  Defined as Secure TRUE, it is indicated that the cookie will be transmitted only by a secure protocol (HTTPS).
https:// www.thextrade.com	IO	This cookie is essential to ensure a connection to the internal information	The thextrade API uses node.js technology to consume a javascript feature from the user's browser.

		provider for the graph generation.	
https:// www.thextrade.com	_ga	Cookies about Google Analytics helps websites owners measure how users interact with website content.	Used to distinguish users (expiration time: 24 hours). See item 2.4.
https:// www.thextrade.com	_gid	Cookies about Google Analytics helps websites owners measure how users interact with website content.	Used to distinguish users (expiration time: 2 years). See item 2.4.

### 2.3 Disabling Cookies

You can control the use of cookies at the individual browser level, and can even block or reject all or some cookies by activating the relevant setting on your browser. If you do block or reject cookies (including essential cookies), you may still be able to access and use the Site and Platform, but your ability to use some of their respective features and areas, together with the services that you connect to through them, may be limited or may simply not function properly. Therefore, it is recommended that you do not disable cookies.

Except for essential cookies, all cookies will expire after estimated 4 hours.

Further information on cookies can be found on various sites such as [www.allaboutcookies.com](http://www.allaboutcookies.com).

### 2.4 Third-Party Cookies

Please note that third parties (including advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical and performance cookies or targeting cookies.

## **Other Information Stored**

### 3.1 Web server Logs

For security and troubleshooting purposes our web server stores logs of activity on the website. The information stored includes: date, time, IP, page visited, result, amount of data sent and browser used.

## **Updates to this Policy**

We will occasionally update this Policy to reflect changes in our practices and services. When we post changes to this Policy, we will revise the "Last Updated" date at the top of this Policy. We recommend that you check this page from time to time to inform yourself of any changes in this Policy or any of our other policies.

## **Support**

Should you require any further information on any of the points listed within this IP Address & Cookie Policy you may contact us at [support@thextrade.com](mailto:support@thextrade.com).