

PRIVACY POLICY

INTRODUCTION

As Troy Precious Metals Trade Inc. (hereinafter referred to as Troy), we undertake to protect your privacy. This Privacy Policy explains how we collect, use and protect your data. Our organization complies with all legal requirements and keeps your data secure.

ABOUT US

As Troy, we are determined to ensure that your personal information is protected and never misused. To create better technologies and experiences, we collect information through Troy websites. We protect and process this information carefully. We are transparent about the use of your information and always inform you about the information you share.

1) DEFINITIONS

The meanings of some terms used in this policy are as follows:

- Personal Data: Any information relating to an identified or identifiable natural person,
- Data Processing: Any operation or series of operations performed on personal data,
- Data Controller: A natural or legal person who determines the purposes and means of processing personal data.

2) WHAT INFORMATION DO WE COLLECT

2.1. Personal Information

Your information that directly identifies you, such as your name, surname, date of birth, ID number, address, telephone number, e-mail address, and your billing information,

2.2. Financial Information

Your bank account numbers, investment information, transaction history, income status, and risk profile,

2.3. Technical Information

IP address, browser type and version, operating system, connection information and your online data collected through cookies,

2.4. User Behavior Information

Your actions, page visits, and interaction information while using our website.

3) OUR INFORMATION COLLECTION METHODS

3.1. Direct Collection

Direct Collection is information that you provide directly when using our services. This method involves collecting information that our clients provide directly. Our clients share with us all the information required to open an account (Name, surname, e-mail address, phone number, etc.). In addition, Troy offers forms for clients to fill out to improve user experience or to receive feedback. Clients also provide information voluntarily, and this information is also among the information collected directly.

3.2. Automatic Collection

Automatic collection refers to the collection of information using various technological tools and systems, other than the information directly provided by our clients. Cookies received from websites visited by clients, technical information such as the device's operating system, browser type and version, IP address and location data, usage data such as time spent on a website, pages visited and operations performed are among the automatic collection methods.

3.3. Collection from Third Parties

Collection from third parties refers to information obtained from other institutions, service providers or business partners, other than the information provided directly by our clients. In addition, information obtained from publicly available sources, information obtained from data provider companies, and information obtained from legal and regulatory institutions are also included in the data collected from third parties.

4) USE OF COLLECTED INFORMATION

4.1. Provision of Services and Enhancement of Functionality

Client information is used to provide basic services. In processes such as opening a client account, ensuring that the client can log in to the system, identity verification is especially needed, and then, depending on the nature of the operation, basic information such as address data and bank information is needed. In addition, this data is also processed to ensure the proper functioning of the website and to resolve technical issues.

4.2. Providing Personalized Experience

Services can be personalized according to clients' preferences and interests. A client's browsing or purchasing history on the website is considered and personalized recommendations are made.

4.3. Client Support Services

This collected information is used to communicate with clients to solve problems and provide better client support. During client support, support teams can use user information and history to solve the client's problem.

4.4. Development of Products and Services

Client feedback and usage data may be used to improve existing services and develop new services. Analyses made in line with client preferences contribute to the development process.

4.5. Marketing and Advertising Purposes

The collected data may be used for advertising and marketing activities. Clients' demographic information and online behaviors are analyzed to provide personalized ads. Thus, marketing efficiency is increased by providing ads specific to the areas of interest to clients.

4.6. Security and Fraud Prevention

All collected data is used to ensure the security of client accounts and to prevent fraud and malicious use. Information such as IP address, device information, location data is used to detect suspicious activity and protect client accounts.

4.7. Fulfillment of Legal Obligations

Troy is required to fully comply with legal obligations such as tax, regulatory compliance and anti-money laundering measures. This information must be stored and archived in accordance with all regulatory requirements. This information must be shared with authorized institutions in the event of any audit or inquiries made by authorized units. This shared information is used within the legal framework.

4.8. Statistics and Analytical Studies

All data obtained from clients may be used to understand client trends, conduct market research, and develop business strategies.

4.9. Optimization of Content and Services

Information such as which pages clients visit more frequently on the website and which content attracts their attention may be used for purposes such as redesigning the website, highlighting these areas of interest more, and improving the layout and content order on the website.

4.10. Notifications and Announcements

Information obtained from clients may be used to provide service-related updates, announcements, a new feature or offers specifically tailored to clients' interests.

The areas of use of all this collected information are carried out within the limits specified in the Privacy Policy, in line with the information and consent of the clients. Various technical and administrative measures are taken to ensure the security of data and to ensure the protection of user privacy.

5) INFORMATION SHARING AND TRANSFER

5.1. Sharing with Business Partners and Service Providers

Data may be shared with our business partners and third-party service providers for the purpose of providing services, improving user experience and conducting operations. These third-party service providers provide support in areas such as payment operations, client support, and analysis services. During sharing, security agreements are made to ensure that the data is processed only for specific purposes and to the necessary extent.

5.2. Sharing Information with Marketing Partners

Data may be shared with our marketing partners for marketing activities and targeted advertising purposes. With this information, clients can be shown advertisements based on their interests. However, such sharing will not be done without their consent.

5.3. Legal Requirements and Sharing with Regulatory Bodies

Troy is obliged to fully comply with certain legal regulations and legislation. In this context, it may share this data with authorized bodies in line with subpoenas, legal investigations, regulatory agency requests and audits. All such sharing is limited within the framework of legal obligations and only the necessary information is provided.

5.4. Mergers and Acquisitions

In cases such as mergers, acquisitions or asset sales, the company can share the client information with the new owner or the managing company. It obtains a pledge from the new management that they will use this data within the framework of the privacy policy. In such cases, clients are informed, and data is shared.

5.5. Sharing for Analysis and Research Purposes

Client information may be anonymized and shared with third parties for analysis and research purposes. This information provides insights into the demographic characteristics, usage habits and general behaviors of clients. Anonymized data does not provide direct information about the client and minimizes the risk of privacy.

5.6. Sharing for Security and Fraud Prevention Purposes

Information may be shared with security partners and relevant authorities to ensure client security and prevent fraud. This sharing is very important for the security of client accounts.

5.7. Information Shared with Client Consent

When explicit consent is obtained from the client for a specific situation, client information may be shared with third parties in accordance with their consent. When giving consent, the client can clearly see and control what information will be shared and how it will be shared.

5.8. Data Transfer and International Sharing

In some cases, client data may be transferred to different countries for the purpose of providing international services. This transfer is made in accordance with international data protection standards to ensure the security of client data.

6) SECURITY OF PERSONAL INFORMATION

6.1. Data Encryption and Secure Communication Channels

Troy uses encryption technologies to protect client data. Especially, all data transmissions between the client and the institution (user sessions, investment transactions, document submission, instructions, etc.) are secured with strong encryption protocols (SSL or TLS). In this way, the risk of data being captured by third parties is minimized.

Encryption standards are also applied in the data storage process, and data is stored securely both within the institution and in cloud systems.

6.2. Identity Verification and Authorization Processes

Troy uses multi-factor identity and signature verification systems to protect its clients' data from unauthorized access. In this way, the identities of people who want to access client accounts and the signatures of the given instructions or transactions are checked with additional verification steps.

In internal systems, roles and permissions are determined so that only authorized employees can access personal information. This authorization is used only when necessary and access is kept to a minimum.

6.3. Data Security and Cyber Security Systems

Troy ensures the protection of client data with advanced cyber security measures such as firewalls, attack detection and prevention systems. These systems are constantly monitoring against any cyber-attack and immediately detect possible security vulnerabilities and take action.

In addition, these systems are subject to periodic security tests and the entire infrastructure is constantly updated against a possible cyber security threat.

6.4. Access Control and Secure Server Infrastructure

Client information is stored in secure server infrastructures and is accessed only through certain protocols.

Employees can access client data only when their job requires it, and these operations are reviewed regularly. With the authorization management policy, unauthorized access to sensitive client information is prevented.

6.5. Continuing Education and Awareness Programs

Troy regularly provides employees with data privacy and security training. In this way, awareness regarding the protection of personal information is increased. Employees also strictly comply with the procedures required to protect client information and are subject to corporate inspections in this regard.

6.6. Data Privacy Policy and User Rights

Troy adopts a transparent privacy policy regarding how client information is collected, processed and stored. Clients can learn in detail what information is collected and in what cases it is shared with third parties.

Clients have the right to request that their information be updated, corrected or deleted at any time. All necessary procedures are implemented to fulfill these requests quickly.

6.7. Intervention and Notification in the Event of a Data Breach

In the event of a possible data breach, Troy has rapid response plans. When a data breach is detected, security measures are immediately increased in the relevant systems and the threat is analyzed.

In the event of a breach, relevant clients are informed as soon as possible, and guidance is provided on possible risks. At the same time, a report on the breach is submitted to the relevant regulatory authorities.

6.8. Secure Data Sharing with Third Parties

Client data is shared only with third parties that are reliable and meet data security standards. These third parties adhere to high security standards to ensure the security of client information and are monitored through audits.

6.9. Regular Data Backup and Recovery Plans

Troy performs regular data backups against possible data loss. These backups are stored in secure environments, and in case of a possible negative situation, restoration from backups can be done to prevent data loss.

The system is designed so that client information can be quickly restored in case of extraordinary situations or system failures. In this way, service continuity and security of client data are guaranteed.

6.10. User Access Notification and Session Security

Troy ensures the security of its clients' sessions with security measures such as two-factor authentication and session timeout.

In order for customers to make their accounts more secure, they are informed about creating strong passwords and current security warnings.

Troy attaches utmost importance to the protection of client information, and in this respect, implements technological, physical and administrative security measures. It takes all necessary measures to ensure the integrity, privacy and accessibility of user data with constantly updated security policies and procedures. This approach includes a great commitment to protecting client security and to providing high security standards in investment processes.

7) DATA STORAGE PERIOD

Troy determines the storage periods of its clients' personal data in accordance with legal requirements and business purposes. The data storing period is regulated within the framework of certain rules in line with the principles of protecting client privacy and ensuring data security.

Troy is subject to legal regulations regarding financial transactions and client information. According to these regulations, especially financial records, transaction information and identity verification documents must be stored for at least 5 years.

Even after the termination of the business relationship with the client, data is kept accessible in line with possible requests or client service needs.

Troy is obliged to securely destroy client information when the storage period ends. Documents in which the data is physically stored are securely destroyed in line with data destruction protocols, and digital data is permanently deleted.

8) COOKIES AND OTHER TRACKING TECHNOLOGIES

Troy uses cookies and other tracking technologies to provide its clients with secure, efficient and personalized experience.

8.1. Cookies

Cookies are small pieces of information stored in the user's browser as data files. Troy uses cookies to manage its clients' sessions on the site, to ensure security, and to remember user preferences.

8.1.1. Session Cookies

These cookies remain active for the duration of the user's stay on the website and are automatically deleted when the session ends. They are used specifically to preserve data such as login information.

8.1.2. Persistent Cookies

These cookies are stored in the user's browser for a certain period and are used to remind the user of their preferences when the user revisits the site.

8.1.3 Third Party Cookies

In some cases, cookies of third-party service providers may be used on the site. These cookies are used especially for analysis and advertising purposes and are managed according to third party security standards.

8.2. Other Tracking Technologies

8.2.1 Pixel Tags

Pixel tags or tracking pixels are small visual files used to track which page a client is on on a site or to track email opening rates. These technologies work with cookies to provide detailed data on user behavior.

8.2.2 Web Beacons

Web beacons work in integration with cookies to track user movements on the site. Web beacons are used especially in security, analysis and advertising processes.

8.2.3 Local Storage

Local storage provided by browsers is used to record users' preferences.

8.3. User Options and Cookie Management

Troy offers its clients the opportunity to manage and choose cookies. Clients can disable cookies or personalize their cookie preferences using browser settings.

9) POLICY UPDATES

Policy updates are regular reviews of privacy and data security policies to ensure compliance with the latest legal regulations and industry standards. Thus, client information is protected in accordance with data protection requirements and national/international standards. Updates are also made to respond to technological developments and client needs.

9.1. Comprehensive and Transparent Notification

Every update made to the policies is notified to the customers in a clear and transparent manner. These notifications are generally made through Troy's website. Clients who review this policy, which can be accessed through the website, have the opportunity to learn how their personal data is processed and protected.

9.2. Legal Compliance and Following Legislation

Troy closely follows the legal regulations regarding the protection of personal data. When there are updates in data protection laws or other legal regulations concerning the financial sector, it makes updates to comply with these changes.

9.3. Client Approval and Permission for Updates

Some significant changes to policies may require client approval. Explicit consent is obtained from clients for such changes, especially when they affect their privacy rights or data sharing conditions.

9.4. Date and Notification of Policy Updates

Troy clearly informs users when the last changes were made by specifying the policy update dates. In this way, clients can see the date as of which the policies are in effect and when the policies were last updated.

9.5. Internal Auditing of Policy Updates

Policy updates are regularly reviewed by the internal audit and compliance unit. These audits guarantee that policy updates are implemented in accordance with corporate standards and serve the purpose of protecting client privacy and data security at the highest level.

10) CONTACT

Troy is pleased to answer any questions, comments or requests you may have regarding the privacy policy and data security practices. In line with our sensitivity to client satisfaction and data privacy, you can share what you wonder regarding our privacy policy. If you have questions about your privacy rights, our personal data processing processes or the security of your data, you can contact us through the following communication channels:

- 1- E-Mail Address: compliance@troypm.com
- 2- Phone Number: +90 212 465 65 70
- 3- Postal Address: İstanbul Dünya Ticaret Merkezi A3 Blok No:193 K:4 Yeşilköy-Bakırköy/İstanbul
- 4- Website: <https://www.troypreciousmetals.com/>

Thank you for taking the time to read our Privacy Policy.