

Please read this Privacy Policy carefully before submitting an Application for access to, or using, this Trading Platform.

This Privacy Policy explains how **Trade Café Inc.** (“**TradeCafe**” or “**we**”) collects, uses, and discloses information about identifiable individuals (“**Personal Information**”) through and in association with its Trading Platform and SMS communications. We are committed to maintaining the accuracy, security and privacy of Personal Information in accordance with applicable legislation and The Campaign Registry (TCR) compliance standards..

SUMMARY

In general, we collect only the information needed to create and manage accounts and/or to operate the Trading Platform and provide SMS communication services. You are not required to provide any Personal Information to us; however, if you choose not to do so, we may be unable to provide our services to you.

We collect contact information and financial information in order to assess and qualify applications for accounts. These accounts may be in the name of a business or an individual. If you choose to open an account as an individual, your use of the Trading Platform will be linked to your identity.

Through your use of the Trading Platform, you may voluntarily provide business and transactional information in order to offer, accept, and carry out transactions, and to receive associated services. We also collect technical information about the use of the Trading Platform and SMS interactions to enable us to operate, maintain, and enhance the services we offer.

We generally use your information in order to provide services to you, including SMS-based support, and to operate our business.

1. What Information do we collect?

1.1 Business Information

Our Trading Platform is primarily designed to enable transactions between businesses. We do not require businesses to identify the individuals who are authorized to use the Trading Platform, except where required by law. However, we may permit named individuals to open accounts and we may permit businesses to identify individuals authorized to use the Trading Platform on their behalf.

Where individual users are not identified to us, or where information relates to a business and not to a natural person, the information we collect is not Personal Information and falls outside the scope of this Privacy Policy.

1.2 Personal Information we collect directly from you

We require certain information in order to process and approve applications for accounts and SMS communications. This includes identity, contact, and financial information, as further detailed in the application form.

We collect and process phone numbers provided by users to send transactional SMS messages. Users must explicitly opt in to receive SMS messages by providing consent through online forms or other approved methods. Opt-out options are clearly stated in all messages.

In the course of using the Trading Platform, you may voluntarily submit information about transactions and proposed transactions, such as the nature, quantity, and price of commodities you wish to buy or sell, and related information.

If you contact us to request technical support, we may request that you provide us with identifying information, contact information, and information about your concern or issue.

You may also voluntarily submit or communicate information to the Trading Platform's employees including trade facilitators, and logistics and treasury personnel through the use of the messaging or chat functions of the Trading Platform. We will collect and maintain records of those messages.

1.3 Personal Information collected through the use of the Trading Platform

As you interact with the Trading Platform, we will automatically collect technical information about your equipment, which may include your internet protocol (IP) address, login credentials, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other information about the devices you use to access this website, and usage information about your browsing actions and patterns when using the Trading Platform. We collect this personal data by using cookies, server logs and other similar technologies.

2. Why do we collect Personal Information?

Generally, we collect Personal Information in order to offer services in accordance with our Terms and Conditions – in particular, to post, execute, and carry out trades and to offer related support services – as well as to operate and improve our Trading Platform and/or other products and services, to protect and enforce our legal rights, and to meet our legal obligations.

In addition, we provide SMS notifications, including account support and transaction updates, SMS Opt-In and Consent, Users opt in to receive SMS messages when they provide their phone number and agree to receive communications from TradeCafe Group. Consent is obtained through explicit forms or website interactions. Users can withdraw consent at any time by replying STOP to any SMS message.

SMS Opt-Out Instructions

Users may opt out of SMS communications at any time by replying STOP or HELP to any message received from us. Upon opt-out, no further messages will be sent unless the user re-subscribes.

SMS opt-in and phone numbers collected for SMS communication purposes will not be shared with any third party and affiliates for marketing purposes

SMS Terms & Conditions

SMS Consent Communication:

The information (Phone Numbers) obtained as part of the SMS consent process will not be shared with third parties for marketing purposes.

2- Types of SMS Communications:

If you have consented to receive text messages from TradeCafe, you may receive messages related to the following (provide specific examples):

- confirmation reminders
- Follow-up messages
- Billing inquiries
- Promotions or offers (if applicable)

Example: *"Dear [Customer Name], we're here to assist with your account on TradeCafe. If you have questions about logging in, transactions, or logistics, contact us at (416) 363-7070. Visit*

<https://www.tradecafe.com/> for more info. Reply STOP OR or HELP to opt-out of SMS assistance."

3- Message Frequency:

Message frequency may vary. You may receive up to 2 SMS messages per week regarding your deals or account status.

4- Potential Fees for SMS Messaging:

Please note that standard message and data rates may apply, depending on your carrier's pricing plan. These fees may vary if the message is sent domestically or internationally.

5- Opt-In Method:

You may opt-in to receive SMS messages from TradeCafe in the following ways by submitting an online form

6- Opt-Out Method:

You can opt out of receiving SMS messages at any time. To do so, simply reply "STOP" to any SMS message you receive. Alternatively, you can contact us directly to request removal from our messaging list.

7- Help:

If you are experiencing any issues, you can reply with the keyword HELP. Or, you can get help directly from us at <https://www.tradecafe.com/>.

Additional Options:

- If you do not wish to receive SMS messages, you can choose not to check the SMS consent box on our forms.

8- Standard Messaging Disclosures:

- Message and data rates may apply.
- You can opt out at any time by texting "STOP."
- For assistance, text "HELP" or visit our https://cdn.tradecafe.com/TradeCafe_Privacy_Policy.pdf
- Message frequency may vary

3. Who has access to Personal Information?

We limit access to your Personal Information to those employees, agents, contractors and service providers who have a business need to know. They will only access, process, or use your Personal Information on our instructions and they are subject to a duty of confidentiality.

4. To whom do we disclose Personal Information?

In general, we do not disclose your Personal Information to third parties except where necessary to carry out a transaction with you or on your behalf, to protect or enforce our legal rights, or where required by law.

For example, we will share payment information with payment service providers and/or banks in order to process payments for transactions you initiate or accept.

5. How long do we retain Personal Information?

We will retain your Personal Information so long as your account and SMS subscription on the Trading Platform remains valid and active and thereafter as required or permitted by law.

6. How do we protect Personal Information?

We have put in place physical, organizational, and technological safeguards to prevent your Personal Information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We have put in place procedures to deal with any suspected data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

7. How can you access and update your Personal Information?

In many cases, the Personal Information you provide to us directly through the Trading Platform will be accessible through the Trading Platform itself. However, if you need assistance or additional information, you may contact us as set out below.

We may need to request specific information or supporting documents from you to help us confirm your identity, to ensure that Personal Information is not disclosed to a person who has no right to receive it.

8. How can you contact us?

For additional information on our privacy practices, please contact our privacy officer, as follows.

privacy@tradecafe.com

Telephone: +1 416 363 7070 ext. 230

9. External Websites

Our Trading Platform may contain links to other websites, which may have different privacy policies and practices than TradeCafe. TradeCafe has no responsibility for such third party websites.

10. Changes to this Privacy Policy

We reserve the right to modify or supplement this Privacy Policy at any time, with appropriate notice to you. We will obtain the necessary consents required under applicable privacy laws if we seek to collect, use or disclose your Personal Information for purposes other than those to which you have previously consented, unless otherwise required or permitted by law.

11. European Data Subjects

While our practices are generally the same for all users and account holders, your legal rights may vary in different legal jurisdictions. This section applies to the use of the Trading Platform in the member states of the European Union.

11.1 Lawful Basis for Processing

The following chart identifies the legal bases we rely on to process your Personal Information.

Purpose	Type of Information	Basis for Processing
----------------	----------------------------	-----------------------------

To qualify and register accounts	Identity Contact Financial	Performance of a contract with you Compliance with legal obligations
To post, display, report on, and process trades, including to manage payments and fees	Identity Financial Transaction	Performance of a contract with you Our legitimate interest in recovering debts due to us
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Identity Contact Technical	Compliance with legal obligations Our legitimate interests in operating our business, maintaining network and system security, and preventing fraud
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	Identity Technical Usage	Our legitimate interests in operating and improving our business and marketing strategy and understanding how our clients use our Trading Platform
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	Technical Usage	Our legitimate interests in developing and improving our business and understanding our clients' needs and preferences

11.2 Location of Processing

The Personal Information referred to above will be transferred to and processed in Canada, which has been determined by the European Commission to provide an adequate level of legal protection.

11.3 Your GDPR Rights

Under certain circumstances, you have the following legal rights under the General Data Protection Regulation (GDPR).

- You may request access to and rectification or erasure of your Personal Information (to the extent permitted by other legal obligations).
- You may object to or restrict our processing of your Personal Information.
- Where we rely on your consent to collect, process, or disclose your Personal Information, you may withdraw your consent at any time. (Your withdrawal of consent will not affect the lawfulness of processing based on consent before such withdrawal.)
- You may raise a concern or lodge a complaint concerning our handling of your Personal Information with a competent supervisory authority.

Please note that, in general, if you exercise these rights in a way that prevents us from lawfully collecting or using information necessary in order for us to provide services to you, we will not be able to provide such services.