

Privacy Policy

TD Bank International S.A. is committed to providing you with the highest quality service. This includes maintaining your privacy and protecting your personal data. In addition to the Terms and Conditions the following policy explains what we do with the personal data we collect about you. Our contact details are at the end of this privacy policy. To get the best from our services, please keep your personal data (including your email address) accurate and up to date. You can do this by logging into our secure website.

Please take the time to read this privacy policy carefully. In opening an account with us you consent to our use of your personal data in accordance with the Terms and Conditions and the Privacy Policy. We hope that by implementing and operating this policy, we will make your online experience a more secure and enjoyable one.

1. Why have a privacy policy?

There are a number of laws which set out important standards regarding information that identifies a living individual. This is known as "personal data." All organisations processing personal data must do so fairly and lawfully. They must also be registered or notified with the Commission Nationale pour la Protection des Données (CNPD) whose role it is to ensure that organisations comply with their data processing obligations. If you wish, you can view a copy of our data protection notification (cf. "Registre public") by visiting the CNPD's website (i.e. www.cnpd.public.lu). At TD Bank International S.A. we treat all of our obligations seriously and take all steps necessary to comply when we store and process your personal data.

2. What personal data do we collect about you and how?

It is essential to us to collect, store and process your personal data so that we can offer and perform our services. Typical information we might ask for includes your name, your address, other contact details and bank account information. We may also store other personal data.

In addition our servers automatically receive and record information on all visitors to our websites. Please see section 6 (below) about cookies for more information.

We will hold your personal data (aside from the automatic information detailed above) once we have received your application form.

We collect your personal data in a number of different ways, including the following:

- if you provide it when communicating with us (For example when registering for our services);
- if you order any of our products or services;
- if you enter a competition or promotion;
- if you make payments or modify your account details;
- and when you visit our websites (for example by cookies and other browser-generated information).

3. How do we use your personal data?

We retain and use your personal data for the following main purposes:

- We reserve the right to access and disclose your personal

data if we are required to do so by law, or if it is necessary for the proper operation of our systems, the protection of TD Bank International S.A. or its users and customers, or for the enforcement of our Terms and Conditions;

- processing applications made by you, running your accounts, providing our services, contacting you and servicing our relationship with you; administration and accounting, billing and auditing and other legal purposes;
- security, payment verification, preventing and detecting money laundering, fraud and other crime, recovering debt; and
- generating statistics on our users, such as the popularity of certain of our services, about the "traffic" visiting our websites. When we do this, your data becomes anonymous and you are not personally identified.

Except where you have not agreed to be contacted or you have written to us asking this we may also use your personal data to keep you informed about relevant products and services. We may use your personal data including your contact details, your application details and details of the services we provide you with and how you use them, to decide what products and services may be of interest to you. We may contact you by telephone, post, email and other electronic messages such as short text, video and picture messaging with information, news, events and seminars on our investment, banking and financial services.

4. Safeguarding your personal data

We take all reasonable care in the collection, storage, processing and disclosure of your personal data and have implemented internal security procedures so as to minimise the risk that unauthorised parties will be able to access the information. It is because of these security procedures that we may ask for proof of identity before we disclose any personal information about you.

Nonetheless, the Internet is an open medium and we cannot guarantee that any information you send to us by email or via our website will not be intercepted or tampered with. To help protect your personal data and minimise the risk of it being intercepted by unauthorised third parties our secure servers employ industry standard Secure Socket Layer v3 (SSL) when you submit information to us through our website. This security is signified by the "https" and the padlock on the URL bar. Some older browsers do not allow the use of current SSL technology and we therefore recommend that you use an up to date browser for example Microsoft Internet Explorer 8.0 or above.

You can also help to protect your personal data, by following the guidelines below:

- choose a password that you will be able to remember but that would be hard for someone to guess. Ideally it should include special characters (such as “?” or “#” for example) and numbers. We recommend that you change it regularly and if you need to write it down, always keep it in a safe place;
- make sure that no-one can see the details you are entering when you log-in;
- if other people have access to your computer, remember to close your browser each time you log-off and end your session and, if possible, clear any history of the websites you have visited and that your browser may have saved or “cached”; and never disclose your account details to anyone.

For more information and top tips please visit the Security/Solidity page of our website (under FAQs).

5. What are cookies and how do we use them?

Our website uses cookies to distinguish you from other users of our website. This helps us provide you with a good experience when you browse our website and allows us to improve our site.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your device if you agree. Cookies collect information that is transferred to your computer's hard drive.

At TD Bank International S.A. our priority is to provide a smooth experience for you while using our website, therefore rather than regularly asking for your consent as you move around our website, we have removed the majority of non-essential cookies from our website.

TD Bank International S.A. has retained the use of one non-essential cookie to help you use the login screen. You can choose to save your Username by consenting to us placing a cookie on your machine. This is a useful feature that prevents you from having to enter your login details every time you visit our website.

TD Bank International S.A. uses certain technologies to help manage online advertising. Anonymised information which does not identify you personally, and does not contain your name, address, telephone number, or email address, is provided by our ad management partner, DFA (i.e. “DoubleClick for Advertisers”). This enables DFA to recognise a unique cookie on your Web browser, which in turn enables us to learn which advertisements bring users to our web site. These third party cookies were placed by us, or by another advertiser who works with DFA. For more information about DFA, including information about how to opt out of these technologies go to <http://www.google.com/doubleclick/>.

Type of Cookies

You can find information about types of cookies below:

Essential Cookies

Essential cookies are used by website providers in order to make the website work and can also be used to remember essential information, such as information about purchases you have chosen to make. TD Bank International S.A. uses essential cookies where necessary.

Session Cookies

Session cookies are temporary cookies that only exist for the period you access the website until you close the browser after accessing the website. Session cookies are automatically deleted from your device when you close your browser. Session cookies can help TD Bank International S.A. remember your movements from page to page, therefore avoiding having to re-enter information. The Session Cookies used by TD Bank International S.A. do not record or store any personal information about you.

Persistent Cookies: Persistent cookies remain on your device after you have visited the website and are not deleted when the browser is closed. Persistent cookies can retain your preferences and allow those preferences to be used in future visits to the site. TD Bank International S.A. uses a persistent cookie to remember if you requested that our website remembers your login details.

Tracking Cookies: Tracking cookies can be used to analyse your usage of a website. These cookies may not identify you personally and are simply used to understand how clients use the website and to make improvements to the website. Some tracking cookies are placed by “third parties”. These cookies are commonly used to evaluate the effectiveness of a company's advertising. TD Bank International S.A. does not use tracking cookies

Cookie Legislation

The EU Privacy and Electronic Communications Directive (Amendment) Regulations 2011, known as The Cookie Legislation, transposed in the Luxembourg regulation through the Law of 28 July 2011 with regard to Data Protection in the electronic communication, requires all businesses operating websites to collect informed consent from visitors for the use of cookies on their equipment before placing cookies or reading cookies on a computer or any other web connected device, like a smartphone or tablet.

It has been designed to protect online privacy, by making you aware of how information about you is collected by websites, what it is used for, and enable you to choose whether or not to allow it to take place.

Which Cookies do TD Bank International S.A. use

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

Cookie Name	What it is used for
Username	This is set at your request and we will get your consent before placing this cookie onto your system. It will allow us to remember your login details on that system.
JSESSIONID	This is essential to the running of the site as it allows us to maintain your session on the private website after you have logged in.
PIN	This allows us to remember your PIN number on the login page
NCS_WJQ-UEXIPVTF-IUUQ	This is essential to the running of the site as it allows us to balance the load of people coming to our website prior to logging in, ensuring you have the fastest and best experience on the site.
ASP.NET_SessionId	This is essential to the running of the site as it allows us to maintain your session on the website before you have logged in.
BackButton_ [HashCode]	This is essential to store information for creating the back button in the toolbar on fund report modules, i.e. back button text, language and referrer URL.

We keep session ID, PIN, NCS, ASP and BackButton cookies after your consent for an indefinite period following your visit to our website.

Restricting Cookies

If you wish to restrict or block the cookies which are set by TD Bank International S.A., or indeed any other website, you can do this through your browser settings. The Help function within your browser should tell you how to do this. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website or you may not be able to use the website as expected.

To view the cookies that have been placed on your computer you can check your browser history:

How can I view cookies which have been placed onto my system?

To view what cookies have been dropped onto your computer you can usually check in your browser history.

For Mozilla Firefox you can do the following:

Go to Tools in your browser menu

- Click on Options
- Go to the Privacy tab
- Select the "remove individual cookies" link
- This will give you a list of folders each individual website you have viewed, allowing you to then open those folders to see what cookies those websites have dropped
- For TD Bank International S.A. there are two folders entitled `tddirectinvesting.lu` and `secure.tddirectinvesting.lu` for before and after you log into your account, respectively
- Open either of these to see what cookies have been dropped onto your computer by TD Bank International S.A.
- Please note that if you have been on the site before 26th May 2012, some pre-existing cookies may still be present on your system

For Internet Explorer you can do the following:

- Go to Tools in your browser menu
- Click on Internet Options
- On the General tab, click the Settings button
- In the Settings window, click to View Files
- This will show you what cookies have been dropped onto your computer
- Please note that if you have been on the site before 26th May 2012, some pre-existing cookies may still be present on your system

6. Sale of the business

In the event that the TD Bank International S.A. business is sold fully or in part, integrated with another business, or it disposes of its rights and obligations under any agreement with you, your records may be disclosed under appropriate confidentiality terms to our advisers and any prospective purchasers' adviser, and will be passed onto the new owners.

7. Contacting us

Please bear in mind that this privacy policy only applies to websites and services operated by TD Bank International S.A. and not those operated by third parties, including those to which our websites may link. We suggest that you make yourself familiar with any privacy policy operated by third party websites before providing personal information about yourself.

Living individuals are entitled to have access for free and without excessive waiting periods to personal data held by the bank by requesting a description or copy of all information held about them, and to have them corrected. If you would like to see this information, please write to the address and send us a copy of your Identification Documentation below:

Data Protection Officer
TD Bank International S.A.
46a, avenue J.-F. Kennedy
L-2958 Luxembourg

If you have any queries about this privacy policy, any of the Terms and Conditions or the website in general, do not hesitate to contact us:

Client Services Manager
TD Bank International S.A.
46a, avenue J.F. Kennedy
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