



## PRIVACY POLICY

Thusney Commerce Group. Ltd. Privacy Policy

This privacy policy applies to personal information and data collected at the [www.thusney.com](http://www.thusney.com) website, and to personal information and data collected by Thusney Commerce Group. Ltd. (“TCG”) for its courses, training, software, research, subscription services, free trials, marketing, and all other products and services it offers on its own or may offer on behalf of third parties including at additional websites (collectively the “Services”). TCG is committed to protecting the privacy of users of the Services. TCG does however gather certain types of information about the users of the Services and wants users to fully understand the terms and conditions surrounding the use of the information we collect. The following discloses our information gathering and dissemination practices for the Services.

### 1. Information TCG collects.

Users can visit the public or “free” sections of our websites without identifying themselves or volunteering personal information. But to otherwise utilize the Services and associated features, a user must first register with TCG. When a user registers, we may request certain personal information, including, but not limited to, contact information, such as the users name, mailing address, telephone number, e-mail address, credit/debit card information, transactional payment information, and demographic information such as age and gender. TCG collects personal information when a user voluntarily provides TCG with this information or where such information is required or permitted to be collected by law or professional standards. Please use your discretion when providing sensitive information to TCG, and under any circumstances.

**By registering and/or submitting personal information to TCG, you consent to TCG’s use of this information for its legitimate business purposes and consent to the transfer and storage of such information to and in TCG’s databases in accordance with this Privacy Statement.** Your personal information is not used for other purposes, unless we obtain your permission, or unless otherwise required or permitted by law or professional standards.



## 2. Purposes of Data Collection

TCG gathers, collects, stores, organizes, and retrieves information and data about users of the Services both collectively and individually. For example, we gather what areas of our websites users visit most frequently, what Services users access most often, and trends or patterns in responses to educational course questions.

TCG processes personal information both as a Processor and as a Controller as defined by the GDPR. TCG will be the Controller for user data. All data collected by TCG will be stored in private server. All hosting is performed in accordance with security regulations. TCG automatically logs IP addresses, session sources, and other data which tracks users' access to the Services. We analyze these logs for sales and marketing purposes, as well as for system performance monitoring. These logs are analyzed for the aggregate trends and patterns they reveal about users of the Services, not for the behaviors of individual users. This information provides us with aggregate data that TCG may use to improve the Services. TCG also gathers personal information about users of the Services individually, for example for provision of customer service and support, billing, security, compliance with the TCG Subscriber Agreement, network management, user surveys, sales management, sales support, newsletters, marketing, user group memberships, event registrations, sponsorships, offers of related products and services, and other exchanges of information.

We may also use the information you send to us to communicate with you via email, and possibly other means, regarding products, services, offers, promotions, or events we think may be of interest to you or to send you our newsletter, if this is in accordance with your marketing preferences. You will always be able to opt-out of such communications at any time through the processes outlined in section 5 below.

## 3. What TCG does with the information it collects.

In addition to the foregoing, TCG may use aggregated personal information to determine the demographic composition of our user base and to distribute statistics and general marketplace information about TCG. This aggregate information does not identify specific users.



Certain non-personal information regarding users is recorded by the standard operation of the Internet servers hosting the Services. This information is primarily used to provide users of the Services with an enhanced online experience. TCG may disclose aggregated user statistics in order to describe the Services to prospective partners, advertisers, purchasers, and other third parties, and for other lawful purposes.

Some features of the Services may be offered in conjunction with an unaffiliated third party, such as another entity or brokerage offering the Services and contracting with TCG as a vendor to provide the Services to users. In order to provide the Services, it may be necessary for either users or TCG to share personal information of users with unaffiliated third parties. If a user does not want his or her information to be shared, the user can choose not to allow the transfer by not using the Services, or by following the opt-out procedures identified in section 5 below.

Also, please be aware that advertisers or websites that are linked to the Services may collect personally identifiable information about users. The information practices of those websites linked to the Services are not covered by this privacy policy and TCG is not responsible for the privacy practices or the content of such websites.

TCG utilizes other companies to provide limited services on its behalf, including but not limited to customer support, web analytics, coordination of mailings and event management. These companies are permitted to access only the information they require to perform those services. TCG requires these companies to maintain the confidentiality of any personal information and data and prohibits them from using the information for any other purpose than the purpose for which it was collected.

The personal information and data users of the Services supply to TCG may also be given, sold, rented, loaned, disseminated, or disclosed to third parties outside of TCG for sales and marketing purposes and solicitations. If a user does not want his or her information to be shared, the user can choose not to allow the transfer by not using the Services, or by following the opt-out procedures identified in section 5 below. A user also can view their information, have errors corrected, or have their information transferred. The personal information and data users of the Services supply to TCG may also be given, transferred, disseminated, or disclosed to third parties under special circumstances, such as when we believe in good faith that disclosure is reasonably necessary to (i) comply with legal process, (ii) enforce any terms of use of the Services, (iii) respond to claims that any content provided by us-



ing the Services violates the rights of third parties, (iv) protect the rights, property, or personal safety of TCG, its users, or the public, (v) enter into or comply with a contract, or (vi) complete an audit of any kind. Please know that TCG may be required to release an individual's personal information in response to a lawful request by public authorities especially to accommodate national security or law enforcement requirements. Before any user's personal information or data will be transferred by us to third parties for commercial purposes, including for sales and marketing, we will first obtain from the third party a contract assuring that it too abides by the Privacy Shield Frameworks as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of data from the European Union or Switzerland, or in the alternative we will obtain a written agreement from the third party.

TCG uses technical, organizational, and administrative security measures to protect information we hold in our records from loss, misuse, and unauthorized access. Unfortunately, no company can guarantee full security. User accounts are protected by a password for privacy and security. Users must prevent unauthorized access to their account by selecting and protecting their password and limiting access to their computer or device and browser.

Personal Information a user submits to TCG may be sent, stored, and processed in the United States, Europe, or any other country in which TCG or its subsidiaries, affiliates, or service providers maintain facilities. TCG may transfer information collected about users, including personal information, to affiliated entities or other parties across national borders. If you are located in the European Union or United Kingdom, or other regions with laws governing data collection and use differing substantially from U.S. law, please note that we will not transfer information without the same or substantially similar data protections in place. These countries may not have similar data protection laws to those in your country of residence. However, TCG will protect your information in accordance with this Privacy Policy wherever it is processed.



TCG retains personal information from users for as long as the user's account is active, or otherwise for a limited period of time after that needed to fulfill the purposes for which the information was initially collected or as otherwise required by law. TCG will retain and use this information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. Billing information will be retained for a period of twenty years as of their provision to TCG based on tax and accounting laws. Information regarding legal transactions between TCG and a user will be retained for a period of twenty years as of their provision to TCG based on the limitation periods set for civil claims.

#### 4. What is a cookie?

A cookie is a small data file that certain websites write to your hard drive when you visit them. A cookie file can contain information that allows a website to track the pages you've visited. But the only personal information a cookie can contain is information you supply yourself. A cookie can't read data off your hard disk or read cookie files created by other sites. TCG uses cookies to tell when a user is a repeat visitor and to let us know how the user found the site. They also allow us to automatically link users to their personalized accounts. When you create an account, TCG may use a cookie to store a unique, random code. TCG only uses this code to identify you anonymously in our database and to track the pages you visit on our site. This helps us better understand and improve areas of the site that our users find valuable. TCG also uses this code to enable you to enter various Services areas without having to log in each time. Some of the services will not work if you have cookies disabled.

#### 5. User Options — Opt-Out

Users of the Services should contact us at the address below with any questions about the information that we collect from users. Users may opt out of receiving any future direct marketing or promotional electronic mailings from TCG by following the unsubscribe procedures indicated in the mailing. Additionally, if a user does not want his or her information to be shared, or does not wish to receive telephone solicitations, users may opt out of the sharing or solicitations by calling us at (416) 273-7201, writing to us at the address below, or emailing us at [info@thusney.com](mailto:info@thusney.com), indicating that he or she wishes to opt out. Users will still receive non-promotional communications such as service-related emails.



#### 6. User Access to Information

TCG acknowledges the individual's right to access their personal data. TCG offers users the ability to edit, correct, change, delete, or transfer the information and data collected during registration or exercise any other subject right available to users under the CANADA General Data Protection Regulation. Users may access this information at any time and as often as necessary by choosing the "My Profile" option or other similar functionality offered in the Services. To access or change your personal information, log in to your account through the Services. For editing data not available through such an account, please call us at (416) 273-7201, write to us at the address below, or email us at [info@thusney.com](mailto:info@thusney.com).

#### 7. Security

All user personal information is stored on servers at a location designed specifically to ensure that no unauthorized individuals have access to the server or its data. We also have appropriate managerial procedures in place to safeguard the information we collect.

#### 8. European Data Protection for Residents of the EU or Switzerland

TCG complies with the EU-US Privacy Shield Framework and the Swiss-US Privacy Shield Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries and Switzerland. TCG has certified that it adheres to the Privacy Shield Principles. If there is any conflict between the policies in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification page, please visit <https://www.privacyshield.gov/>

#### 9. Complaints and Dispute Resolution for Residents of the EU or Switzerland

In compliance with the EU-US and Swiss-US Privacy Shield Principles, TCG commits to resolve complaints about your privacy and our collection or use of your personal information. European Union or Swiss individuals with inquiries or complaints regarding this privacy policy should first contact TCG via:

**Enquiries: (416) 273-7201**  
**Email: [info@thusney.com](mailto:info@thusney.com)**  
**WWW.THUSNEY.COM**



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call us at (416) 273-7201, write to us at the address below, or email us at [info@thusney.com](mailto:info@thusney.com).

TCG has further committed to refer unresolved privacy complaints under the EU-CANADA and Swiss-CANADA Privacy Shield Principles to an independent dispute resolution mechanism.

Finally and under limited circumstances, complaints not resolved through these channels may seek redress before the Privacy Shield Panel, a binding arbitration independent recourse mechanism.

#### 10. User Consent

By using the Services, users signify their assent to this privacy policy and to the collection, use and dissemination of their personal information and data, including to third parties, as described herein, and for the purposes described herein. TCG may transfer personal data outside the user's region for certain situations, such as when necessary to perform services provided by TCG, for pre-contractual steps or in a user's interest, or for other legitimate business interests that are not overridden by the user's interests. By registering for TCG services, a user authorizes TCG to transfer their personal data outside the user's region. If a user does not agree to this policy, or to the collection, use and dissemination of their personal information and data, including to third parties, as described herein, and for the purposes described herein, he or she should not use the Services, or follow the opt-out procedures identified in section 5 above.



## 12. Changes to Privacy Policy

If TCG changes this privacy policy, we will post those changes at [www.vectorvest.com/privacy](http://www.vectorvest.com/privacy) so that users will always know what information we gather, how we might use that information, and whether we will disclose it to anyone. Continued use of the Services by a user following the posting of changes to these terms will likewise mean the user accepts those changes.

## 13. Contact Us

The information provided is intended to be transparent, concise, and understandable. If you have any questions or complaints regarding this policy, please contact:

Thusney Commerce Group, Ltd.  
1 Younge Street,  
Toronto, ON M5E1W7

T: (416) 273 - 7201  
F: (416) 273 - 2372  
E: [info@Thusney.com](mailto:info@Thusney.com)



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#### 14. Children

TCG does not knowingly collect or solicit personal information from anyone under the age of thirteen. No one under thirteen years old should attempt to register for TCG services or send any information to TCG. TCG will delete any information collected from a child under the age of thirteen from our services expediently once it is identified. Should you believe a child under the age of thirteen has provided us with personal information, call **us at (416) 273-7201, write to us at the address above, or email us at [info@thusney.com](mailto:info@thusney.com).**