



## BI Global Brokers Group, Ltd.

# PRIVACY POLICY

BI Global Brokers Group, Ltd. Privacy Policy

This privacy policy applies to personal information and data collected at the [www.biglobalbrokers.com](http://www.biglobalbrokers.com) website, and to personal information and data collected by BI Global Brokers Group, Ltd. (“BI GLOBAL BROKERS”) 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”). BI GLOBAL BROKERS is committed to protecting the privacy of users of the Services. BI GLOBAL BROKERS 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 BI GLOBAL BROKERS 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 BI GLOBAL BROKERS. 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. BI GLOBAL BROKERS collects personal information when a user voluntarily provides BI GLOBAL BROKERS 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 BI GLOBAL BROKERS, and under any circumstances.

**By registering and/or submitting personal information to BI GLOBAL BROKERS, you consent to BI GLOBAL BROKERS’s use of this information for its legitimate business purposes and consent to the transfer and storage of such information to and in BI GLOBAL BROKERS’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.

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### 2. Purposes of Data Collection

BI GLOBAL BROKERS 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.

BI GLOBAL BROKERS processes personal information both as a Processor and as a Controller as defined by the GDPR. BI GLOBAL BROKERS will be the Controller for user data. All data collected by BI GLOBAL BROKERS will be stored by blockchain. All hosting is performed in accordance with security regulations. BI GLOBAL BROKERS 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 BI GLOBAL BROKERS may use to improve the Services. BI GLOBAL BROKERS also gathers personal information about users of the Services individually, for example for provision of customer service and support, billing, security, compliance with the BI GLOBAL BROKERS 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 BI GLOBAL BROKERS does with the information it collects.

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



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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. BI GLOBAL BROKERS 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 BI GLOBAL BROKERS as a vendor to provide the Services to users. In order to provide the Services, it may be necessary for either users or BI GLOBAL BROKERS 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 BI GLOBAL BROKERS is not responsible for the privacy practices or the content of such websites.

BI GLOBAL BROKERS 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. BI GLOBAL BROKERS 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 BI GLOBAL BROKERS may also be given, sold, rented, loaned, disseminated, or disclosed to third parties outside of BI GLOBAL BROKERS 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 BI GLOBAL BROKERS may

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ing the Services violates the rights of third parties, (iv) protect the rights, property, or personal safety of BI GLOBAL BROKERS, its users, or the public, (v) enter into or comply with a contract, or (vi) complete an audit of any kind. Please know that BI GLOBAL BROKERS 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 that it will adhere to the Privacy Shield Frameworks.

In cases of onward transfer to third parties of data of [EU or Swiss individuals](#) received pursuant to the Privacy Shield Frameworks, BI GLOBAL BROKERS is potentially liable. To learn more about the Privacy Shield program, and to view BI GLOBAL BROKERS certification, please visit <https://www.privacyshield.gov/>

BI GLOBAL BROKERS 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 BI GLOBAL BROKERS may be sent, stored, and processed in [the United States, Europe, or any other country](#) in which BI GLOBAL BROKERS or its subsidiaries, affiliates, or service providers maintain facilities. BI GLOBAL BROKERS 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, BI GLOBAL BROKERS will protect your information in accordance with this Privacy Policy wherever it is processed.

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BI GLOBAL BROKERS 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. BI GLOBAL BROKERS 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 BI GLOBAL BROKERS based on tax and accounting laws. Information regarding legal transactions between BI GLOBAL BROKERS and a user will be retained for a period of twenty years as of their provision to BI GLOBAL BROKERS 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. BI GLOBAL BROKERS 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, BI GLOBAL BROKERS may use a cookie to store a unique, random code. BI GLOBAL BROKERS 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. BI GLOBAL BROKERS 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 BI GLOBAL BROKERS 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@thuensy.com](mailto:info@thuensy.com), indicating that he or she wishes to opt out. Users will still



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### 6. User Access to Information

BI GLOBAL BROKERS acknowledges the individual's right to access their personal data. BI GLOBAL BROKERS 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 [EU 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, write to us at the address below, or email us at [info@biglobalbrokers.com](mailto:info@biglobalbrokers.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](#)

BI GLOBAL BROKERS 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. BI GLOBAL BROKERS 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, BI GLOBAL BROKERS 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

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

BI GLOBAL BROKERS has further committed to refer unresolved privacy complaints under the EU-US and Swiss-US Privacy Shield Principles to an independent dispute resolution mechanism, the BBB EU PRIVACY SHIELD, operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit [www.bbb.org/EU-privacy-shield/for-eu-consumers/](http://www.bbb.org/EU-privacy-shield/for-eu-consumers/) for more information and go to <http://www.bbb.org/EU-privacy-shield/file-a-complaint/> to file a complaint.

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. Complaints and Dispute Resolution for Residents [outside of the EU and Switzerland](#)

If you reside outside of the EU or Switzerland and have any complaints about this privacy policy, or related to your personal information and data, please contact us at the address and contact information in Section 13 below.

### 11. 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. BI GLOBAL BROKERS may transfer personal data outside the user's region for certain situations, such as when necessary to perform services provided by BI GLOBAL BROKERS, 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 BI GLOBAL BROKERS services, a user authorizes BI GLOBAL BROKERS 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 iden-

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### 12. Changes to Privacy Policy

If BI GLOBAL BROKERS 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:

**BI Global Brokers Group, Ltd.**  
E: [info@biglobalbrokers.com](mailto:info@biglobalbrokers.com)

### 14. “Do Not Track” Disclosure

**California and Delaware law require** BI GLOBAL BROKERS to indicate whether it honors “Do Not Track” settings in your browser concerning targeted advertising. “Do Not Track” is not yet a finalized standard, so BI GLOBAL BROKERS follows the standards set out in this Privacy Policy and does not monitor or respond to Do Not Track browser requests.





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### 15. Children

BI GLOBAL BROKERS 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 BI GLOBAL BROKERS services or send any information to BI GLOBAL BROKERS. BI GLOBAL BROKERS 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, write to us at the address above, or email us at **[info@biglobalbrokers.com](mailto:info@biglobalbrokers.com)**.