

# Cookies Policy

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## 1 Introduction

This Cookies Policy (“Policy”) explains how **GTC Global (Australia) Pty Ltd (ABN 84 611 436 796)** (“**GTC AU**”, “**we**”, “**us**”, or “**our**”) uses cookies and similar technologies in connection with its public website and related online content.

This Policy applies to individuals who visit or interact with our website. It should be read together with our **Privacy Policy**, which sets out how we **collect, use, store, and disclose** Personal Information more generally.

Unless otherwise defined in this Policy, capitalised terms have the same meaning as set out in our Privacy Policy.

## 2 What Are Cookies and Similar Technologies

- 2.1** Cookies are small text files that are stored on your device (such as a computer, tablet, or mobile phone) when you visit a website. Cookies allow a website to recognise your device and support website functionality, preferences, and performance monitoring.
- 2.2** In addition to cookies, we may use similar technologies such as web beacons, pixels, tags, or scripts. These technologies perform functions similar to cookies and are commonly used to support analytics, security, and website optimisation.
- 2.3** Cookies and similar technologies used on our website do not, by themselves, enable us to directly identify you. Where information collected through cookies constitutes Personal Information, that information will be handled in accordance with our Privacy Policy.

## 3 Use and Purpose of Cookies

- 3.1** GTC AU’s public website may use first-party and third-party cookies or similar technologies to improve your browsing experience and to understand how visitors engage with our content.
- 3.2** Cookies used on our website may assist us in the following ways, but are not limited to:

- (a) recognise returning visitors and maintain basic website functionality;
  - (b) customise and improve the layout, design, and usability of our website;
  - (c) store preferences relating to language, display, or region;
  - (d) collect anonymous or aggregated usage data for analytics and website-performance monitoring; and
  - (e) enhance website security and detect potential misuse, abnormal activity, or technical issues.
- 3.3** Cookies are used for operational, informational, and security purposes only. We do not use cookies to track individual financial activity, record trading behaviour, monitor account usage, or profile users for targeted advertising.

#### **4 Third-Party Cookies and Analytics**

- 4.1** We may use reputable third-party analytics tools (for example, Google Analytics) to help us understand how visitors access and use our website.
- 4.2** These tools may collect aggregated information such as pages viewed, time spent on pages, referral sources, browser type, and general device or location information. This information is used to analyse website traffic patterns and improve website functionality and content.
- 4.3** Third-party analytics providers are required to handle information collected through their technologies in accordance with their own privacy policies and applicable law.
- 4.4** GTC AU does not control cookies or similar technologies deployed by third-party websites or platforms that may be linked from our website. Once you leave our website, the cookies and tracking practices of those third parties are governed by their own policies.

#### **5 Referral Links and External Platforms**

- 5.1** Where our website contains referral links or transition points to third-party product issuers, service providers, or external platforms, cookies or similar technologies may be used to record limited referral source information, such as the referring page or time of referral.

- 5.2 Referral attribution information is used for governance, record-keeping, and operational purposes only.
- 5.3 GTC AU does not operate, control, or monitor your activity on any third-party website or platform, and does not track trading activity, account activity, or transaction behaviour on external platforms.

## 6 Educational Content and Website Functionality

- 6.1 Where our website provides access to educational materials, webinars, tutorials, or learning resources, cookies or similar technologies may be used to support session continuity, remember user progress, and maintain general engagement records.
- 6.2 Information collected for these purposes is used to improve educational content, maintain operational continuity, and support internal participation and usage records where relevant.
- 6.3 Cookie-based engagement information is not used to provide personal financial advice, assess product suitability, or recommend that you acquire or dispose of any financial product.

## 7 Managing and Disabling Cookies

- 7.1 Most internet browsers allow you to manage or disable cookies through browser settings. You may choose to accept, reject, or delete cookies by adjusting your browser preferences.
- 7.2 Please note that disabling cookies may affect the availability, functionality, or performance of certain features of our website, including security-related features.
- 7.3 Information on managing cookies is generally available through your browser's help function or the website of your browser provider.

## 8 Consent and Preferences

- 8.1 Where required by applicable law or where practicable, GTC AU seeks to provide users with meaningful choices in relation to the use of non-essential cookies, including through any cookie notice, banner, or preference mechanism made

available on the website from time to time.

- 8.2 Strictly necessary cookies are required for core website functionality and security, and cannot be disabled without impacting website operation.
- 8.3 You may also manage cookies independently through your browser settings as described in this Policy.

## 9 Cookie Accuracy and Updates

- 9.1 Any examples of cookies or technologies referenced in this Policy are illustrative only and may change from time to time depending on website configuration, service providers, and embedded content.
- 9.2 Where published, any cookie list or cookie register made available on our website is intended to provide additional transparency regarding cookies in use at a given time.
- 9.3 If there is any inconsistency between an illustrative example in this Policy and cookies actually deployed on the website, the cookies actually deployed will prevail.

## 10 Regulatory Framework and Applicable Laws

- 10.1 GTC AU is subject to Australian laws and regulatory oversight in relation to privacy, data protection, and the provision of financial services.
- 10.2 In connection with the use of cookies and similar technologies:
  - (a) GTC AU is bound by the **Privacy Act 1998 (Cth)** and the Australian Privacy Principles, which regulate the collection, use, disclosure, and security of Personal Information;
  - (b) GTC AU is regulated by the **Office of the Australian Information Commissioner (OAIC)** in respect of privacy and data protection obligations;
  - (c) as the holder of an **Australian Financial Services Licence**, GTC AU is also subject to regulatory oversight by the **Australian Securities and Investments Commission (ASIC)** in relation to its financial services activities, including associated online communications; and
  - (d) where information collected through cookies constitutes Personal Information,

that information is handled in accordance with the above laws and GTC AU's **Privacy Policy**.

## **11 Cross-Border Data Considerations**

- 11.1** Cookies and analytics data may be processed using systems or service providers located outside Australia.
- 11.2** Where information collected through cookies constitutes Personal Information and is disclosed cross-border, GTC AU will take reasonable steps to ensure that such information is handled in accordance with the Australian Privacy Principles and as further described in our Privacy Policy.

## **12 Relationship to Privacy Policy**

- 12.1** This Policy forms part of GTC AU's broader privacy framework and should be read together with our Privacy Policy.
- 12.2** Our Privacy Policy contains further information about how we handle Personal Information, including your rights to access and correction, and how to lodge a privacy complaint.

## **13 Updates to This Policy**

- 13.1** This Policy is current as at the effective date stated above. GTC AU may update it from time to time to reflect changes in technology, legal requirements, or website functionality.
- 13.2** Any updated version of this Policy will be published on our website. By continuing to use our website after an update takes effect, you are deemed to have accepted the revised Policy.