

# Privacy Policy

## **Your privacy is important to HYCM.**

---

Your privacy is important to us. This statement outlines HYCM's policy on how we manage the personal information we hold about our customers, shareholders and others.

It is HYCM policy to respect the confidentiality of information and the privacy of individuals. HYCM is bound by the Data Protection Principles contained in the Data Protection Act 1998.

HYCM Privacy Policy Statement will be reviewed from time to time to take account of new laws and technology, changes to our operations and practices and to make sure it remains appropriate to the changing environment. Any information we hold will be governed by the most current HYCM Privacy Policy Statement.

## **Why does HYCM collect personal information?**

---

Our business is to meet our customers' needs for a range of financial services. To do this effectively, we need to collect certain personal information.

## **What kind of personal information do we ask for?**

---

The type of personal information we may collect can include (but is not limited to) name, address, date of birth, contact details, income, assets and liabilities, account balances, trading statements, tax and financial statements and employment details.

We obtain most of the information directly from our customers through application or other forms, and from maintaining records of information provided in the course of ongoing customer service. We may also obtain information from other sources.

We may ask for other information voluntarily from time to time (for example, through market research, surveys or special offers) to enable us to improve our service or consider the wider needs of our customers or potential customers.

If you choose not to provide the information we need to fulfill your request for a specific product or service, we may not be able to provide you with the requested product or service.

## **How do we use this information and who may we disclose it to?**

---

While we may send you marketing material from time to time that we think will be useful to you, we are conscious of the need to respect your privacy.

Unless you are informed otherwise, the personal information we hold is used for establishing and managing your account, reviewing your ongoing needs, enhancing customer service and products and giving you ongoing information or opportunities that we believe may be relevant to you.

Depending on the product or service concerned and particular restrictions on sensitive information, this means that personal information may be disclosed to:

- other companies within the Henyep group who provide financial and other services
- service providers and specialist advisers to HYCM who have been contracted to provide HYCM with administrative, financial, insurance, research or other services
- introducing brokers or partners with whom we have a mutual relationship (any of whom may be within or outside the European Economic Area)
- credit providers, courts, tribunals and regulatory authorities as agreed or authorised by law
- credit reporting or reference agencies

- anyone authorised by an individual, as specified by that individual or the contract

Generally, we require that organisations outside the Henyep Group of companies who handle or obtain personal information as service providers to HYCM acknowledge the confidentiality of this information, undertake to respect any individual's right to privacy and comply with the Data Protection Principles and this policy.

## **Management of personal information**

---

HYCM trains its employees who handle personal information to respect the confidentiality of customer information and the privacy of individuals. HYCM regards breaches of your privacy very seriously and will impose appropriate penalties, including dismissal.

HYCM has an appointed Privacy Officer to ensure that our management of personal information is in accordance with this statement and the Privacy Act.

## **How do we store personal information?**

---

Safeguarding the privacy of your information is important to us, whether you interact with us personally, by phone, mail, over the internet or other electronic medium. We hold personal information in a combination of secure computer storage facilities and paper-based files and other records, and take steps to protect the personal information we hold from misuse, loss, unauthorised access, modification or disclosure.

We may need to maintain records for a significant period of time. However, when we consider information is no longer needed, we will remove any details that will identify you or we will securely destroy the records.

## **How do we keep personal information accurate and up-to-date?**

---

HYCM endeavours to ensure that the personal information it holds is accurate and up-to-date. We realise that this information changes frequently with changes of address and other personal circumstances. We can generally update your customer information over the telephone.

## **You have the right to check what personal information about you is held by us**

---

Under the Data Protection Act, you have the right to obtain a copy of any personal information which HYCM holds about you and to advise HYCM of any perceived inaccuracy. The Act does set out some exceptions to this.

To make a request, please write to us, verifying your identity and specifying what information you require.

## **What if you have a complaint?**

---

If you consider that any action of HYCM breaches this Privacy Policy Statement or the Data Protection Principles or otherwise doesn't respect your privacy, you can make a complaint. This will be acted upon promptly. To make a complaint, please telephone us on + 44 - 208 - 816 - 7812.

## **How to contact us**

---

If you want to:

make a general enquiry about HYCM privacy policy

change your personal information

access your personal information

phone HYCM on + 44 - 208 - 816 - 7812

or write to us at: HYCM, 3<sup>rd</sup> Floor, 28 Throgmorton Street, London EC2N 2AN, United Kingdom.

## **Privacy: Web supplement**

---

This statement outlines some privacy issues specific to the www.hycm.com website. HYCM may collect personal information you enter when using our website.

### **What is a cookie and how does HYCM use cookies?**

---

Cookies are small pieces of text stored on your computer to help us determine the type of browser and settings you are using, where you have been on the website, when you return to the website, where you came from, and to ensure your information is secure. The purpose of this information is to provide you with a more relevant and effective experience on the HYCM site, including presenting web pages according to your needs or preferences.

HYCM may also use independent external service providers to track the traffic and usage on the web site. Cookies are frequently used on many websites on the internet and you can choose if and how a cookie will be accepted by changing your preferences and options in your browser. You may not be able to access some parts of www.hycm.com if you choose to disable the cookie acceptance in your browser, particularly the secure parts of the website. We therefore recommend you enable cookie acceptance to benefit from all the services on the website.

### **Technology improvements**

---

HYCM is constantly striving to improve functionality on this site through technology changes. This may mean a change to the way in which personal information is collected or used. The impact of any technology changes which may affect your privacy will be notified in this Supplement at the time of the change.

### **Links to third party websites**

---

The HYCM website may have links to external third party websites that may benefit the user. Please note, however, that third party websites are not covered by HYCM privacy policy and these sites are not subject to HYCM privacy standards and procedures.