

PRIVACY POLICY

HYCM (Europe) Ltd., (hereafter the “Company” or “HYCM” or “we, us, our”) is regulated by the Cyprus Securities and Exchange Commission under license 259/14. HYCM Europe Ltd is fully owned by the Henyep Capital Markets Group. All references on this Policy to "HYCM" refer to HYCM Europe only and subsidiaries of the Henyep Capital Markets Group. HYCM is a global brand owned by an entity in the Henyep Capital Markets Group. This Privacy Policy explains the way HYCM collects, uses and manages personal information from its active clients and potential clients. HYCM is committed to safeguarding your privacy.

By opening a trading account with HYCM, the client gives consent to such collection, processing, storage and use of personal information by HYCM as explained below.

Your privacy is important to HYCM.

It is the Company’s policy to respect the confidentiality of information and the privacy of individuals. HYCM is bound by the Data Protection Principles contained in the Processing of Personal Data (Protection of Individuals) Law of 2001, its amendment in 2003, and the Regulation of Electronic Communications and Postal Services Law of 2004

Privacy Policy Updates

HYCM’s 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 Privacy Policy Statement. The revised Privacy Policy will be uploaded in the HYCM website. In this respect, the clients hereby agree to accept posting of a revised Privacy Policy electronically on the website as the actual notice of HYCM to its clients. If any of the changes made are of material importance then we will notify you by email or by means of a notice on the home page. Any dispute over HYCM’s Privacy Policy is subject to this notice and the Client Agreement. HYCM encourages its clients to periodically review this Privacy Policy so that they are always aware of what information HYCM collects, how it uses it and to whom it may disclose it, in accordance with the provisions of this Policy.

Why does HYCM collect personal information?

Our goal is to fully satisfy our customers' requirements whilst meeting our regulatory obligations. To do this effectively, we need to collect certain personal information. It is your choice to provide HYCM with the information required and requested, however any missing information may result in its being unable to provide you with trading services.

What kind of personal information do we ask for?

In order for HYCM to provide its clients with the investment services, HYCM is required to collect, process and retain personal data of its clients in accordance with mandatory legal requirements. The type of personal information we may collect can include (but is not limited to)

- Personal information such as your name, address, date of birth, telephone number
- Financial details such as your estimated annual income, estimated net worth, your financial investment experience and knowledge;
- Documents that you provide to us to verify your identity, such as your passport or ID card, utility bills and/or bank statement.

HYCM is obligated by the present regulations to keep your data on record for a period of five (5) years which starts counting after the execution of the transactions or the end of the business relationship.

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. This may include, but not limited to, site areas visited, pages viewed, frequency and duration of visits, Internet Protocol (IP) address, computer identification parameters, types of transactions conducted and documents downloaded. 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.

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

The main purpose we use your personal information for is to enable us understand your financial objectives and ensure that relevant services are appropriate to your profile. Further, this information helps HYCM to provide quality services. While we may send you marketing material (*including but not limited to SMS or email communication for you to view, margin calls, or other information*) 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.

HYCM will not disclose your personal information without your prior consent however, depending on the product or service concerned and particular restrictions on sensitive information, this means that personal information may be disclosed to:

- Service providers and specialist advisers to HYCM who have been contracted to provide us 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 authorized by law
- A Trade Repository or similar under the Regulation (EU) No 648/2012 of the European Parliament and of the Council of 4 July 2012 on OTC derivatives, central counterparties (CCPs) and trade repositories (TRs) (EMIR)
- Credit reporting or reference agencies, third authentication service providers, fraud prevention, anti-money laundering purposes, identification or due diligence checks of the client
- Anyone authorized by an individual, as specified by that individual or the contract
- To an Affiliate of the Company or any other company in the same group of the Company.

In case such disclosure is required to be made by law or any regulatory authority, it will be made in order for HYCM to comply with any legal obligations, protect itself from potential fraud, and maintain service provider agreements. In case such disclosure is required it will be made on a 'need-to-know' basis, unless otherwise instructed by the regulatory authority. Generally, we require that organizations not under HYCM (Europe) Ltd 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.

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, unauthorized access, modification or disclosure. As stated above, HYCM is obligated by the present regulations to keep your data on record for a period of five (5) years which starts counting after the execution of the transactions or the end of the business relationship.

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

HYCM endeavors to ensure that the personal information it holds is accurate and up-to-date. We realize that this information changes frequently with changes of address and other personal circumstances. We can generally update your customer information over the telephone. Clients consent to the receipt of such contact when they agree to our terms and conditions of use when registering with HYCM. Any person wishing to opt out of further contact with HYCM at any time whatsoever is entitled to do so, simply by contacting HYCM either by phone or email and requesting that no further contact on behalf of HY Options be made. In addition, HYCM may, on occasion, seek to contact clients, either by phone or by email, for the purpose of informing them of unique promotional offerings provided by HYCM for the client.

What is a cookie and how do we 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 website.

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.

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.

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 refer to our Complaints Handling Policy.

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 us at +357 2524 5750 or write to us at: HYCM (Europe) Ltd, 15 Spyrou Kyprianou Avenue, Matrix Tower II, 1st floor, Mesa Geitonia, Limassol, Cyprus

Privacy: Web supplement

This statement outlines some privacy issues specific to the www.hycm.com 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.

Choice and Opt-out

During the registration process with HYCM, you will be presented with the option to opt-out of subscribing to the following additional services:

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- Marketing services, which provides you with information regarding the products and services offered by HYCM or its partners; and opportunities that we believe may be relevant to you
 - Newsletters
 - SMS (text) messages
 - Other electronic communications.
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If you no longer wish to receive the above mentioned communications, you may opt-out of receiving them by following the instructions included in each communication.

Queries

Should you have any additional questions or concerns regarding this Policy, please kindly contact us at any time at info@hycm.com or call us at +357 25 245750
