

# Privacy Policy

Version July 2017

## Overview

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Henyp Capital Markets (UK) Limited (“HYCM”, “The Company”, “The firm”, “we” or “us”), is authorised and regulated by the Financial Conduct Authority in the UK. The company appears on the FCA's Register: HYCM's FCA registration number is 186171. Further information may be obtained from the FCA's Register by visiting the FCA's website <http://www.fca.org.uk/register>.

## Your Privacy is important to HYCM

Your privacy is important to us as it is our policy to reflect the confidentiality of information and the privacy of individuals. Our 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.

We are bound by the Data Protection Act 1998.

This privacy policy covers:

- Information we collect
- Use of your information
- Management and storage of the information
- Your rights in respect of the information

HYCM is registered as a data controller in the United Kingdom. When submitting or uploading your information to HYCM you accept and consent to the following:

- a) The information is held on externally hosted databases in Hong Kong and London. Personal information is also held in manual form and on other computer systems, (personal information includes all information submitted by you).
- b) Personal information about you may be held and processed by HYCM for the purpose of managing your account(s) with us; carrying out regulatory checks and to meet HYCM's regulatory obligations; developing and improving our services through the assessment and analysis of information; to help prevent and detect fraud, money laundering and other crimes; checking your location to determine your approximate location; and to keep you informed about our services.
- c) 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:
  - HYCM's affiliates worldwide, including affiliates located in countries outside of the European Economic Area;
  - 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 reporting or reference agencies
  - may be disclosed to public authorities and law enforcement agencies as permitted by law; and
  - anyone authorised by an individual, as specified by that individual or the contract

we require that organisations outside the Henyp 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.

- d) HYCM is committed to keeping data about you accurate and up to date. Therefore, the client should advise HYCM of relevant changes to their details. HYCM 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.
- e) If you consider that any action of HYCM breaches this Privacy Policy Statement or the Data Protection Principles or otherwise does not 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.
- f) You may access the personal information held about you by or on behalf of HYCM, in order to review, edit, erase or to ascertain the purposes for which it is processed subject to certain criteria being met. Please contact HYCM for further information if you wish to obtain insight in your personal information.
- g) Your information may be used for anonymous statistics for internal purposes in which case the information will be used collectively. All personal data shall be anonymised.

## Privacy: Web supplement

This statement outlines some privacy issues specific to the [www.hycm.com](http://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, 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 <http://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.