

HYCM Limited
Privacy Policy
(version December 2018)

TABLE OF CONTENTS

1	INTRODUCTION	3
2	PRIVACY POLICY UPDATES.....	3
3	WHY DOES HYCM COLLECT PERSONAL INFORMATION.....	3
4	WHAT KIND OF PERSONAL INFORMATION DO WE ASK FOR?	3
5	HOW DO WE USE THIS INFORMATION AND TO WHOME WE MAY DISCLOSE IT?.....	4
6	SECURITY AND MANAGEMENT OF PERSONAL INFORMATION	5
7	HOW DO WE STORE PERSONAL INFORMATION?.....	5
8	PERSONAL INFORMATION ACCURATE AND UP-TO-DATE.....	5
9	WHAT IS A COOKIE AND HOW DO WE USE COOKIES	5
10	LINKS TO THIRD PARTY WEBSITES	6
11	WHAT IF YOU HAVE A COMPLAINT?.....	6
12	HOW TO CONTACT US.....	6
13	PRIVACY: WEB SUPPLEMENT.....	6
13.1	Technology improvements.....	6
13.2	Choice and Opt-out	6

1 INTRODUCTION

HYCM Limited (hereafter the “Company” or “HYCM” or “we, us, our”) is regulated for the purposes of securities investment business by the Cayman Islands Monetary Authority under license 1442313 under the Securities Investment Business Law (2015 Revision) and related Regulations (“SIBL”). HYCM is subject to the Cayman Islands Data Protection Law, 2017 (the “Law”) and the data protection principles thereunder (“Data Protection Principles”). This Privacy Policy explains the way HYCM collects, uses and manages, or arranges the processing of, 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 hereby gives explicit consent to such collection, processing, storage, transfer and use of personal information by HYCM as explained below.**

This Policy should be read must be read in conjunction with, and constitutes part of, the Customer Agreement and Terms of Business.

2 PRIVACY POLICY UPDATES

HYCM’s Privacy Policy Statement (“Privacy Policy”) 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. HYCM encourages its clients to periodically review the HYCM website and 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 Privacy Policy.

3 WHY DOES HYCM COLLECT PERSONAL INFORMATION

Our goal is to fully satisfy our clients’ requirements whilst meeting our regulatory obligations. To do this effectively, we need to collect and retain certain personal information. It is your choice to provide HYCM with the information required and requested, however any missing information may result in HYCM being unable to provide you with trading services and your account may not be approved, or if opened, may be terminated.

4 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 under the Law. The type of personal information we may collect can include (but is not limited to)

- Personal information such as your name, address, nationality, date and place of birth, telephone number and employment details;
- Financial details such as your estimated annual income, estimated net worth, your source of funds/wealth and 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.

We obtain most of the information directly from our clients 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 including, but not limited to, site area or residence visits, pages viewed, frequency and duration of visits, Internet Protocol (IP) address, credit reference or similar third-party checks and references 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.

5 HOW DO WE USE THIS INFORMATION AND TO WHOME WE MAY DISCLOSE IT?

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 your personal information may be disclosed or transferred by HYCM, whether within or outside the Cayman Islands, to:

- Members of the HYCM group of companies and affiliates
- Service providers and specialist advisers to HYCM who have been contracted to provide us with administrative, legal, financial, audit, insurance, research or other services
- Introducing brokers or partners with whom we have a mutual relationship
- Courts, tribunals, government agencies, regulatory and enforcement authorities, as permitted by applicable law
- Credit providers, reporting or reference agencies,
- Third party authentication or verification service providers for fraud or crime prevention, anti-money laundering purposes, including identification or due diligence checks of the client
- Anyone authorized by an individual, as specified by that individual or the contract
- A prospective purchaser of the business of HYCM, or its parent

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 affiliated with HYCM who process, 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.

6 SECURITY AND MANAGEMENT OF PERSONAL INFORMATION

Protecting the confidentiality of your personal information is of paramount importance to us here at HYCM. We have in place both technical and organisational measures to guarantee your information is kept safe and secure. Our staff are trained to ensure client information is respected and handled appropriately, ensure the data of the client is confidential and the privacy of client is maintained. Any breaches of your privacy will be taken treated severely and will result in penalties, including dismissal and termination of contract where necessary.

7 HOW DO WE STORE PERSONAL INFORMATION?

HYCM is obliged to keep your data on record for a minimum period of five (5) years from the execution of the transactions or the end of the business relationship.

8 PERSONAL INFORMATION ACCURATE AND UP-TO-DATE

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 and personal information. However, when we consider information is no longer needed, and we are legally permitted to destroy or delete it, it shall be destroyed or returned to the client.

9 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.

10 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.

11 WHAT IF YOU HAVE A COMPLAINT?

If you consider that any action of HYCM breaches this Privacy Policy 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 email us at complaints@hycm.com.

12 HOW TO CONTACT US

If you want to:

- make a general enquiry about the Privacy Policy
- understand your rights as a data subject under the Law
- change your personal information; or
- access your personal information

write to us at: HYCM Ltd, 71 Fort Street, 1st Floor Appleby Tower, P.O. Box 950, Grand Cayman, KY1-1102, Cayman Islands or email us at info@hycm.com

13 PRIVACY: WEB SUPPLEMENT

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

13.1 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, processed, stored 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.

13.2 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:

- 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.

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.