

HYCM Limited
Privacy Policy
(version July 2018)

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1 INTRODUCTION

HYCM Limited (hereafter the “Company” or “HYCM” or “we, us, our”) is regulated by the Cayman Islands Monetary Authority under license 1442313. 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.**

2 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. 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.

3 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.

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. 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.

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.

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. 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
- 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 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.

6 HOW DO WE STORE PERSONAL INFORMATION?

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.

7 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. 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.

8 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.

9 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.

10 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 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.

11 HOW TO CONTACT US

If you want to:

- make a general enquiry about HYCM privacy policy
- change your personal information
- access your personal information

write to us at: HYCM Ltd, 47 Spyrou Kyprianou Avenue, The Noble Center, 4th Floor Mesa Geitonia, Limassol, Cyprus, 4003 or email us at info@hycm.com

12 PRIVACY: WEB SUPPLEMENT

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

12.1 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 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.

12.2 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.