

PRIVACY POLICY

1. Introduction

- 1.1 This Privacy Policy sets out the way HSN Capital Group Ltd (hereafter “The Company”) collects, uses and manages personal information from its visitors, potential and active clients and clients who have terminated their business relationship with the Company who are accessing or using the Company’s website(s) and mobile applications.
- 1.2 The Company is committed to safeguarding the information / Personal Data it collects, uses and/or holds in accordance with the provisions of the European General Data Protection Regulation EU 2016/679 (hereinafter ‘GDPR’) and any regulations of the Republic of Seychelles which implement or supplement the GDPR.
- 1.3 The Company is committed to protecting the privacy of all Client’s personal data which it obtains during the Account Opening process, including but not limited to, information obtained during a Client’s visit to the Company/s websites. The Company would like to assure any existing or prospective clients, applicants and visitors that it has taken measurable steps to protect the confidentiality, security and integrity of the Client’s Information.
- 1.4 The Company controls the ways the Client’s Personal Data is collected and the purposes for which the Client’s Personal Data is used by the Company, acting as the “data controller” for the purposes of applicable European data protection legislation.

2. Collection of Personal Data

- 2.1 In order to receive more information, register for a demo account or open a trading account with us you are requested to complete a Registration Form. By completing the Registration Form, you provide personal information in order to enable us to evaluate the application and comply with laws and regulations governing the provision of financial services. We will also use the same information to contact you regarding the products and services the Company offers.
- 2.2 The Personal Data we collect include but are not limited to:
 - Personal information such as your name, surname, physical address, e-mail address, telephone number, birth date, gender, education, occupation and employment details;
 - IP Address
 - Financial information such as your annual income, financial assets, net worth, trading experience and investment knowledge etc;
 - Bank account details, e-wallets, credit card details, tax information

- Identity verification documents, such as copy of your Passport/Identity Card/ Driver's License, copy of utility bills, copy of bank account statements or company information/incorporation details in case of an entity etc.

2.3 The Company can only process Clients' Personal Data when there is a genuine reason to do so and it must be one of the following:

- a) To fulfil any contract the Company may have with Data Subject ("the Client")
- b) The Company has have a legal obligation
- c) Where the client has given consent to the Company to process his/her data
- d) When it is in the Company's legitimate interest
- e) When it is in the public interest
- f) When it is in the Client's vital interest.

3. Use of Personal Data

3.1 The Company will use, store, process and handle the Client's Personal Information (in case they are a natural person) in connection with the furthering of the Agreement between the Company and the Client, in accordance to the Personal Data (Protection of the Individual) Law 138(I)/2001, the General Data Protection Regulation (Regulation (EU) 2016/679) (GDPR) Law as amended or replaced from time to time. The Company may be required to retain and use personal data to meet the Client's internal and external audit requirements, for data security purposes and as believed to be necessary or appropriate in order:

- a) To comply with the Company's obligations under Directive 95/46/EC on the Protection of Personal Data, the Processing of Personal Data (Protection of the Individual) Law 138(I)/2001, the General Data Protection Regulation (Regulation (EU) 2016/679) (GDPR) Law, this Policy and the Company's Terms and Condition, which may include laws and regulations outside the Client's country of residence;
- b) To respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include such authorities outside the Client's country of residence;
- c) To monitor compliance with and enforce the Company's Platform terms and conditions;
- d) To carry out anti-money laundering, sanctions or Know Your Customer checks as per applicable guidelines and regulations;
- e) To protect the Company's rights, privacy, safety, property, or those of other persons. The Company may also be required to use and retain personal data after the Client has closed the Client's account for legal, regulatory and compliance reasons, such as the prevention, detection or investigation of a crime; loss prevention; or fraud prevention.

- 3.2 The Company also collect and process non-personal, anonymized data for statistical purposes and analysis and to help the Company in providing its Clients with better products and services in the future.
- 3.3 The Company needs to comply with the Anti-money Laundering regulations, therefore hard copies and/or in electronic format copies shall be retained as evidence. Also, the measures that are taken by the Company in regards to your identity verification, source of income and wealth, monitoring of your transactions, telephone/text/e-mail communication, and transaction history must be kept to be able for the Company to demonstrate to the regulator that has acted in accordance with the legislation.
- 3.4 The Company shall not disclose to a third party, any of its clients' confidential information unless required to do so by a regulatory authority of a competent jurisdiction; such disclosure shall occur on a 'need-to-know' basis, unless otherwise instructed by a regulatory authority. Under such circumstances, the Company shall expressly inform the third party regarding the confidential nature of the information.

4. *Disclosure of Personal Data*

- 4.1 Any personal information which the Company holds, is to be treated as confidential and may be shared within the Company and its partners to meet its contractual and legal obligations. Client information will not be used for any purpose other than in connection with the provision, administration and improvement of their Services to the Client or the furthering of the Client Agreement, for managing the Client's account, for reviewing their ongoing needs, for enhancing customer service and products, for giving the Client ongoing information or opportunities the Company believes may be relevant to the Client, for improving their business relationship, for anti-money laundering and due diligence checks, for research and statistical purposes and for marketing purposes.
- 4.2 Under the Client Agreement, the Client agrees that the Company has the right to disclose Client information (including but not limited to, recordings and documents of a confidential nature, card details and personal details) in the following circumstances:
- technological experts that appointed by the Company to support the smooth operation of our systems
 - platform providers
 - payment service providers/credit institutions for facilitating the incoming and outgoing payments of the Clients
 - governmental authorities and regulatory bodies
 - fraud prevention agencies, third party authentication service providers, verification/screening service providers

- data reporting service providers to meet our regulatory obligations
- external consultants

Under such circumstances, the Company shall expressly inform the third party regarding the confidential nature of the information.

5. *Data Transfer outside the EEA*

5.1 The Client hereby acknowledges and understands that the Company may transfer personal information to a third party who is in a foreign country outside the Republic if:

- a) The Client has given their explicit consent to the proposed transfer, or
- b) The transfer is necessary for the performance of a contract between the Client and the Company or the implementation of pre- contractual measures taken in response to the Client's request;
- c) The transfer is necessary for the conclusion or performance of a contract concluded in the interest of the Client between the Company and the third party; or
- d) The transfer is necessary or legally required on important public interest grounds, or for the establishment, exercise or defense of legal claims; or
- e) The transfer is necessary for the protection of vital interests of the Client; or
- f) The transfer is for the benefit of the Client.

5.2 If the Company does transfer the Client's Personal Data outside of the EEA, within the group or to their business partners, they will take measures to ensure it is protected to the same standards as it would be within the EEA by relying on one of the following:

- a) The country that is receiving the Client's Personal Data has been found by the European Commission to offer the same level of protection as the EEA. More information can be found on the European Commission Justice website.
- b) The Company will use contracts that require the recipient to protect the Client's Personal Data to the same standards as it would be within the EEA.
- c) Where the transfer is to the USA and the recipient is registered with Privacy Shield. Privacy Shield is a framework that ensures Personal Data is protected to a level approved by the EU. Read more about Privacy Shield on the European Commission Justice website.

In some instances the Company may be compelled by law to disclose the Client's Personal Data to a third party and may have limited control over how it is protected by that party.

6. *Clients' Rights over their Personal Data*

- **Right of Access:** The Client has the right to be informed whether the Company is processing his/her Personal Data and if so, to provide the Client with a copy of that Data.

- Right to amendment: The Client can request to amend his/her Personal Data in order to correct or complete the provided Personal Data.
- Right to Deletion: The Client can request to delete/remove his/her Personal Data under certain circumstances, for instance if his/her consent has been withdrawn.
- Right to Restrict Processing: The Client can request from the Company to restrict the processing of his/her Personal Data if it is not accurate, it has been used unlawfully or it is not relevant anymore but wish not to be deleted for any reason and waiting for the Company's confirmation to stop using his/her Personal Data.
- Right to portability: The Client can request to obtain his/her Personal Data in a readable format.
- Right to Stop Processing: The Client can request from the Company to stop processing his/her Personal Data, and the Company will do so if a) the Company cannot demonstrate compelling legitimate grounds for the processing or b) the Company is processing Client's Personal Data for marketing purposes.
- Right to Withdraw Consent: Withdraw consent at any time where we are relying on consent to process your Personal Data
- Right to complain: If the Client has grounds to believe that the Company does not appropriate use his/her Personal Data, can submit a complaint to the Office of the Commissioner for Personal Data Protection.

If you would like to unsubscribe from any emailing or any marketing communications you can please send an email to info@hscapitalgroup.com stating so.

7. Cookies

7.1 Cookies are small text files stored on a user's computer for record-keeping purposes. The Company uses cookies on the Website. The Company does link the information that it stores in cookies to any personal information the Client submits while accessing the Company's website.

7.2 The Client will be able to review the Company's Cookie Policy to understand more about the kind of cookies they use and how they can control and delete cookies.

8. Security of Personal Data

8.1 The Client's Information is stored on secure servers.

8.2 The Company limits access of Client's Information only to authorized personnel or partners that need to know the information in order to enable the carrying out of the Client Agreement.

- 8.3 The Company has procedures in place regarding how to safeguard and use Client's Information, for example, by requesting the Company's Affiliates and employees to maintain the confidentiality of the Client's Information.
- 8.4 Following MiFID II Regulations, Directive 2014/65/EU, the Company will not keep the Client's Information for any longer than is required.
- 8.5 In many cases, information must be kept for considerable periods of time. As in accordance to MiFID II Regulations, Directive 2014/65/EU, retention periods will be determined taking into account the type of information that is collected and the purpose for which it is collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable time. Under the applicable MiFID II regulations, the Company will keep records containing Client personal data, trading information, account opening documents, communications and anything else which relates to the Client for at least 5 (five) years and or up to a maximum of 7 (seven) years after termination of the Agreement between the Company and the Client. In any event, the Company will keep the Client's Information for the duration of applicable Limitation of Actions Laws as a minimum.
- 8.6 The Company is committed to safeguarding and protecting personal data and will implement and maintain appropriate technical and organisational measures to ensure a level of security appropriate to protect any personal data provided to them from accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data transmitted, stored or otherwise processed.

9. Contact us

- 9.1 If the Client has any questions regarding this policy, wish to access or change their information, have a complaint or if they have any questions about security on the Website, they may email the Company at compliance.hn@alvexo.com.
- 9.2 If the Client is not satisfied with the Company's response or believe they are not processing the Client's personal data in accordance with the law, they can escalate their complaint to the data protection regulator in their jurisdiction

10. Changes in the Privacy Policy

- 10.1 This Policy is subject to change without notice. For this reason the Client is advised to look for updates from time to time.