

# HIROSE FINANCIAL UK LTD.

## Privacy Policy

HIROSE FINANCIAL UK LTD (“we”, “us”, “our”) is committed to protecting your privacy.

This notice should be read in conjunction with the Business Terms and Conditions of use for [www.hiroseuk.com](http://www.hiroseuk.com) (the “Website”) of which it forms part.

This Privacy Policy explains how we use the information we collect about you, how you can instruct us if you prefer to limit the use of that information and procedures that we have in place to safeguard your privacy.

You can visit the Website without disclosing any personally identifiable information about yourself.

By using the Website or submitting information to us through or in connection with the Website, you signify your consent to our collection, use and disclosure of your personal information in accordance with this Privacy Policy. If you do not agree with this Privacy Policy, you must not use the Website or submit information to us through or in connection with it.

### 1 THE INFORMATION WE COLLECT AND HOW WE USE IT

We will use, store or otherwise process any personal information that relates to and identifies you, including but not limited to your name, postal address, e-mail address, telephone number, and any other information collected on application, via trading transactions and through surveys to the extent reasonably necessary to provide the services that are available through our Website to you by us.

We process this information for the purpose of:

- confirming your identity;
- managing your account;
- dealing with your inquiries and requests;
- providing such services as are requested by you;
- managing and administering the products and services provided to you;
- compiling and maintaining your profile;
- administering membership records;
- keeping you updated as a customer in relation to relevant matters;
- keeping the Website up to date and personalising our services to you.

We also gather this information and statistics for the purposes of monitoring Website usage and may provide such aggregate information to third parties. These statistics will not include information that can be used to identify you.

You may ask us to provide you with information about our services or services offered jointly with or on behalf of other organisations by sending us an e-mail at [info@hiroseuk.com](mailto:info@hiroseuk.com), calling us on 0207-614-3580 or writing to us at the following address: Hirose Financial UK Ltd. 27 Austin Friars, London EC2N 2QP.

If you stop using the Website or your permission to use the Website is terminated, we may continue to use and disclose your personal information in accordance with this Privacy Policy (as amended from

time to time) and as permitted by law. However, if you wish us to stop e-mailing you with information in connection with the Website, please send your request in accordance with paragraph 4 below.

## **2 INFORMATION SECURITY**

The Internet is not a secure medium. However, we have put in place various security procedures as set out in this policy. Your user administration area is protected by your user name and password, which you should never divulge to anyone else.

Please be aware that communications over the Internet, such as emails/webmails are not secure unless they have been encrypted. Your communications may route through a number of countries before being delivered – this is the nature of the World Wide Web/Internet. We cannot accept responsibility for any unauthorised access or loss of personal information that is beyond our control.

We believe that we have appropriate policies, rules and technical measures to protect the personal data that we have under our control (having regard to the type and amount of that data) from unauthorised access, improper use or disclosure, unauthorised modification, unlawful destruction or accidental loss.

All of our employees and data processors that have access to, and are associated with, the processing of your personal information are obliged to respect the confidentiality of our visitors' information.

We ensure that your information will not be disclosed to government institutions or authorities except if required by law or when requested to by regulatory bodies or law enforcement organisations.

## **3 TO WHOM WILL YOUR INFORMATION BE DISCLOSED?**

Your information may, for the purposes set out in this Privacy Policy, be disclosed for processing to:

- our employees;
- our affiliates;
- our group companies and their employees;
- successors in title to our business;
- financial institutions and other similar organisations that we deal with in the course of the services we offer;
- third party consultants, contractors or other service providers who may access your personal information when providing services (including but not limited to IT support services) to us;
- any organisation or person acting on your behalf to whom you request us to provide information, including your financial advisor, broker, solicitor or accountant;
- third parties where it is necessary to process a transaction or provide services you have requested;
- government bodies and law enforcement agencies and in response to other legal and regulatory requests;
- auditors or contractors or other advisers auditing, assisting with or advising on any of our business purposes,

in any jurisdiction where we operate.

## **4 YOUR RIGHTS IN RELATION TO YOUR INFORMATION**

You can write to us or email us at [info@hiroseuk.com](mailto:info@hiroseuk.com) at any time to obtain a copy of your information and to have any inaccuracies corrected. Where appropriate, you may have your personal information

erased, rectified, amended or completed. Please write to Hirose Financial UK Limited, 27 Austin Friars, London EC2N 2QP or email us at [info@hiroseuk.com](mailto:info@hiroseuk.com).

Please quote your name and address. We should be grateful if you would also provide brief details of the information of which you would like a copy or which you would like to be corrected (this helps us to more readily locate your data).

We will require proof of your identity before providing you with details of any personal information we may hold about you. We will charge £10 to cover the administration costs involved in providing you with a copy of your information.

## 5 COOKIES

Pieces of information transferred to your computer's hard disk from a website are known as cookies. They allow our Website to store information about your browsing patterns, making the Website more useful to you. Many major sites use cookies: in fact, they are commonly used throughout the Internet to offer personalised services. Most browsers are automatically set to accept cookies. Each time you use our Website, the cookie is accessed. This way, we can track the features you use and the pages and content that you view on the Website to help personalise your experience.

You may disable cookie support on your browser but be aware that by doing so, you will lose certain features that require a cookie to work properly. We may use the information collected by the cookie to provide us with various statistics without identifying any individual.

Please refer to our "[More Information on Cookies](#)" page for further information on the cookies we use on our Website and on how you are able to change the settings for the cookies used.

## 6 YOUR CONSENT

By submitting any personal information (including, without limitation, your account details) to us you consent to the use of information as set out in this policy. We reserve the right to amend or modify this Privacy Policy and if we do so we will post the changes on the Website. It is your responsibility to check the Privacy Policy when you submit information to us. Your use of the Website will signify that you agree to any such changes.

Owing to the global nature of the Internet infrastructure, the information you provide may be transferred in transit to countries outside the European Economic Area. We also operate globally and so it may be necessary to transfer your personal information to other companies within our group of companies or to other third parties located in countries outside of the EEA (specifically, Japan, Hong Kong, Malaysia, and the USA) to enable the provision of the services you have requested. Countries outside of the EEA may not have similar protections in place regarding your data and its use as set out in this policy. However, we have taken the necessary steps outlined above and required by applicable law to try and protect the security of your information.

## 7 THE DATA PROTECTION ACT 1998

HIROSE FINANCIAL UK LTD is registered as a Data Controller under the terms of the Data Protection Act 1998 and we ensure we comply with all the protection the Act affords to you. Our registration number is Z2709712.

## 8 USE OF YOUR PERSONAL INFORMATION SUBMITTED TO OTHER WEBSITES

We are not responsible for the privacy policies and practices of other websites even if you accessed a third party website using links from our Website.

We recommend that you check the policy of each website you visit and contact the owner or operator of such website if you have concerns or questions.

**9 FURTHER INFORMATION**

For further information from us on data protection and privacy or any requests concerning your personal information please write to Hirose Financial UK Ltd. 27 Austin Friars, London EC2N 2QP or email us at [info@hiroseuk.com](mailto:info@hiroseuk.com).