

HIROSE FINANCIAL UK LTD.

Privacy Policy

HIROSE FINANCIAL UK LTD (“Hirose UK”, “we”, “us” and “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 (the “Website”) of which it forms part.

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.

By law we must maintain a record of the data processing activities we are responsible for. This is contained in our [Record of Processing Activities](#).

1 DATE PROTECTION ACT

Hirose UK may process information relating to you (including personal data as defined under the Data Protection Act 1998), including holding such information in a manual format or electronic database, to satisfy contractual, regulatory or statutory requirements we may have. Unless we receive specific written instructions to the contrary you agree that we may process this information to fulfil such obligations.

2 PRIVACY POLICY INTRODUCTION

Hirose UK is committed to protecting the security and privacy of your personal information. It is important that we conduct our business in compliance with laws on privacy, data protection and data security. This Privacy Policy outlines what information we may collect, how we use and safeguard the information and with whom we may share it.

Hirose UK is committed to maintaining the highest standards of integrity in our business. In conducting our business, it is necessary to obtain, handle, process, disclose, transfer and store information about our clients. We take these activities seriously and seek to provide fair, secure and appropriate methods, that are consistent with both generally accepted privacy ethics and standard business practices, when carrying them out.

If you have any questions or comments about our Privacy Policy, please contact our Customer Support team.

3 PERSONALLY IDENTIFIABLE INFORMATION

We may collect and process the following data about you:

- Information that you provide by filling in forms on our Website. This includes information provided at the time of registering to use our Website, subscribing to our service, posting material or requesting further services (including, but not limited to, your application, Hirose UK account number, name, email address, home address, telephone number, trading activity and history, commission charged (including the portion shared with any third party who introduces you to us (Introducer) or is engaged in the activities described in 4(iii), (iv), (v), (vi), (vii) and/or (viii)), open and closed trading positions, your account balance and other financial information, use of your account and your use of our service, Website and facilities). We may automatically capture, store and otherwise process information about you.
- We may also ask you for information when you enter a competition or promotion held by us.
- When you report a problem with our Website.

- If you contact us (whether electronically or by post), we may keep a record of that correspondence and retain the records for such periods as may be necessary or required by law.
- If you contact us by telephone, we may monitor and/or record your conversations with us and retain the recordings for such periods as may be necessary or required by law.
- We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.
- With regard to each of your visits to our Website we may automatically collect the following information:
 - technical information, including the Internet protocol (IP) address used to connect your computer to the internet, location data, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, server logs and other communication data;
 - information about your visit, including, but not limited to, all Uniform Resource Locators (URL) clickstream analysis information (which includes collecting, analysing and reporting aggregate data about which pages you visit and in what order, which site you have visited our Website from and which site you go to after leaving our Website (including applicable dates and times)); traffic data; products you viewed or searched for; page response times; download errors; length of visits to certain pages; page interaction information (such as scrolling, clicks, and mouse-overs); and methods used to browse away from the page;
 - and any phone number used to call our customer service number.
- When working closely with third parties (including, but not limited to, business partners, Introducers, agents and sub-contractors in technical, administration, support, payment and delivery services, advertising networks, social media networks, analytics providers and search information providers) we may exchange information about you with them.
- We may obtain information about you from third parties for the purposes of our compliance with antimoney laundering, anti-fraud and customer due diligence checks, such as credit reference agencies and fraud prevention agencies.

The information about any rights that might be available to you in relation to the personal information we hold about you is set out below. You can write to us or email us at info@hiroseuk.com at any time to make a request accordingly.

Access

If you ask us, we will confirm whether we are processing your personal information and, if so, provide you with a copy of that personal information (along with certain other details). If you require additional copies, we may need to charge £10 as an administration fee.

Rectification

If the personal information we hold about you is inaccurate or incomplete, you are entitled to have it rectified. If we have shared your personal information with others, we will let them know about the rectification where possible. If you ask us, where possible and lawful to do so, we will also tell you who we have shared your personal information with so that you can contact them directly.

Erasure

You can ask us to delete or remove your personal information in certain circumstances such as where we no longer need it or you withdraw your consent (where applicable) provided that we have no legal obligation to retain that data. Such request will be subject to any retention limits we are required to comply with in accordance with applicable laws and regulations and subject to section SAFEGAURDING AND RETENTION OF RECORDS. If we have shared your personal information

with others, we will let them know about the erasure where possible. If you ask us, where possible and lawful to do so, we will also tell you who we have shared your personal information with so that you can contact them directly.

Processing Restrictions

You can ask us to 'block' or suppress the processing of your personal information in certain circumstances such as where you contest the accuracy of that personal information or object to us processing it. It will not stop us from storing your personal information though. We will tell you before we lift any restriction. If we have shared your personal information with others, we will let them know about the restriction where possible. If you ask us, where possible and lawful to do so, we will also tell you who we have shared your personal information with so that you can contact them directly.

Data Portability

Under the General Data Protection Regulation (679/2016), you have the right, in certain circumstances, to obtain personal information you have provided us with (in a structured, commonly used and machine readable format) and to reuse it elsewhere or ask us to transfer this to a third party of your choice.

Objection

You can ask us to stop processing your personal information, and we will do so, if we are:

- relying on our own or someone else's legitimate interests to process your personal information except if we can demonstrate compelling legal grounds for the processing;
- processing your personal information for direct marketing; or
- processing your personal information for research unless such processing is necessary for the performance of a task carried out in the public interest.

Automated Decision-Making and Profiling

If we have made a decision about you based solely on an automated process (e.g. through automatic profiling) that affects your ability to use the services or has another significant effect on you, you can ask to not to be subject to such a decision unless we can demonstrate to you that such decision is necessary for entering into, or the performance of, a contract between you and us. Even where a decision is necessary for entering into or performing a contract, you may contest the decision and require human intervention.

4 WHERE WE STORE YOUR PERSONAL DATA

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, Singapore, and the USA) The data that we collect from you may be transferred to, and stored at other companies within our group of companies or to other third parties located in countries outside of the European Economic Area (EEA). It may also be processed by staff operating outside the EEA who work for us, one of our suppliers, Introducers, business partners, agents or sub-contractors. They be engaged in, among other things; (i) the fulfilment of your order; (ii) the processing of your payment details; (iii) the provision of administration and support services in respect of your customer account with us; (iv) communicating with you about your account and your account functionality and tools; (v) marketing and/or promoting services to you; (vi) other administration and support services; (vii) marketing; and/or (viii) other services.

By submitting your personal data, you agree to this transfer, storing and processing.

5 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:

- **To verify your identity and establish and manage your account**

As part of providing services, or information about our services, to you, we will need to verify your identity to set you up as a customer and we will need to use those details in order to effectively manage your account with us to ensure that you are getting the best possible service from us. This may include third parties carrying out credit or identity checks on our behalf. It is not only in our legitimate interest to do so but the use of your personal information in this way is necessary for us to know who you are as we have a legal obligation to comply with certain Know Your Customer regulatory obligations.

- **To provide you with products and services, or information about our products and services, and to review your ongoing needs**

Once you open an account with us, or subscribe to an update, we will need to use your personal information to perform our services and comply with our obligations to you. It is also in our legitimate interests to ensure that we are providing the best products and services so we may periodically review your needs to ensure that you are getting the benefit of the best possible products and services from us.

- **To help us improve our products and services, including customer services, and develop and market new products and services**

We may from time to time use personal information provided by you through your use of the services and/or through customer surveys to help us improve our products and services. It is in our legitimate interests for us to use your personal information in this way to ensure that we provide you with the best products and services we can and to continue to be a market leader in our industry.

- **To maintain your personal profile and administer membership records**

We may from time to time use personal information about you to form profiles about you so that we can understand you and provide the very best products and services we can. We may also make decisions about you through automated profiling or automated credit checks which may affect your ability to use our services. We may need to do this either to perform our legal obligations or because it is in our legitimate interest to use your personal information in such a way.

- **To investigate or settle enquiries or disputes**

We may need to use personal information collected from you to investigate issues and/or settle disputes with you as it is in our legitimate interests to ensure that issues and/or disputes get investigated and resolved as quickly and efficiently as possible.

- **To comply with applicable law, court order, other judicial process, or the requirements of any applicable regulatory authorities**

We may need to use your personal information to comply with applicable law, court order or other judicial process, or the requirements of any applicable regulatory authority. We do this not only to comply with our legal obligations but because it may also be in our legitimate interest to do so.

- **To provide references about you**

From time to time, third parties, such as credit agencies may approach us to provide a credit reference about you for credit and identity checks. It may be in our legitimate interest to comply with our legal obligations or we may be obliged to provide such a reference in order to

comply with a legal obligation. However if we are unsure we will speak to you first before providing any reference.

- **To send you surveys**

From time to time, we may send you surveys as part of our customer feedback process and it is in our legitimate interest to ask for feedback to ensure that we provide the best service to you. However, we may from time to time also ask you to participate in other surveys and if you agree to participate in such surveys we rely on your consent to use the personal information we collect as part of such survey. All responses to any survey we send out whether for customer feedback or otherwise will be aggregated and depersonalised before survey results are shared with any third parties.

Data Analysis

Our web pages and e-mails may contain web beacons or pixel tags or any other similar type of data analysis tools which allow us to track receipt of correspondence and to count the number of users that have visited our webpage or opened our correspondence. Where your personal information is completely anonymised, we do not require a legal basis as the information will no longer constitute personal information. However where your personal information is not in an anonymised form, it is in our legitimate interest to continually evaluate that personal information to ensure that the products and services we provide are relevant to the market.

Marketing by Us

We may use your personal information to send you marketing communications by email or phone or other agreed forms (including social media campaigns) to ensure that you are always kept up to date with our latest products and services. Where we send you marketing communications we will either do so as it is in our legitimate interest or with your consent.

Internal Business Purposes and Record Keeping

We may need to process your personal information for internal business and research purposes and record keeping purposes. Such processing is in our own legitimate interests and is required in order to comply with our legal obligations. This may include any communications that we have with you in relation to the services we provide to you and our relationship with you. We will also keep records to ensure that you comply with your obligations under any contract you have entered into with us.

Corporate Restructuring

If we undergo a corporate restructure or part or all of our business is acquired by a third party, we may need to use your personal information in association with that restructure or acquisition. Such use may involve disclosing your details as part of a due diligence exercise. It is our legitimate interest to use your information in this way provided we comply with any legal obligation we have to you.

Security

If you enter any of our premises we may record your image on our CCTV for security reasons. We may also take your details to keep a record of who has entered our premises on any given day. It is in our legitimate interest to do this to maintain a safe and secure working environment.

We may also use your data, or permit selected third parties to use your data, to provide you with information about goods and services which may be of interest to you and we or they may contact you about these goods and services by e-mail, post, SMS message or telephone. If you are a customer, we may contact you by electronic means (e-mail, SMS, post and/or telephone) with information about goods and services similar to those which were the subject of a previous sale to you. If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, you can contact us by email, telephone or post to inform us that you no longer wish to receive marketing communications. If you unsubscribe to marketing communications, you will still continue to

receive operational communications from us that we deem necessary for the operation of your account. We do not disclose information about identifiable individuals to our advertisers or partners who provide content to our Website, but we may provide them with aggregate information about our users. We may also use such aggregate information to help advertisers reach the kind of audience they want to. We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience.

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, calling us on 0207-614-3580 or writing to us at the following address: Hirose Financial UK Ltd. 25 Finsbury Circus, London EC2M 7EE. .

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 to us.

6 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;
- the Financial Conduct Authority and other regulatory authorities, governmental bodies or authorities whom we are required to disclose by law;
- 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;
- introducing brokers or similar persons with whom we have a mutual relationship (any of whom may be outside or inside the EEA);
- credit providers, courts, tribunals and law enforcement agencies;
- credit reporting or reference agencies; or
- auditors or contractors or other advisers auditing, assisting with or advising on any of our business purposes.

in any jurisdiction where we operate.

We require any third-party service provider that we share Personal Information with, undertake to respect any individual's right to privacy and comply with the Data Protection Principles. These third - party service providers may keep a record of any searches performed on our behalf and may use the

search details to assist other companies in performing their searches. Third parties are not covered by this privacy policy.

7 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.

8 SAFEGUARDING AND RETENTION OF RECORDS

Safeguarding the privacy of your information is important to us, whether you interact with us personally, by phone, by mail, over the internet or any other electronic medium. We hold personal information in a combination of secure computer storage facilities and paper-based files and other records, and take steps to protect the personal information we hold from misuse, loss, unauthorised access, modification or disclosure. When we consider that personal information is no longer needed, we will remove any details that will identify you or we will securely destroy the records. However, we may need to maintain records for a significant period of time. For example, we are subject to certain anti-money laundering laws which require us to retain:

- a copy of the documents we used to comply with our customer due diligence obligations; and
- supporting evidence and records of transactions with you and your relationship with us,

for a period of five years after our business relationship with you has ended. If we hold any personal information in the form of a deed, we will hold this deed in its complete form for a period of 10 years after our business relationship with you has ended. If we hold any personal information in the form of a recorded communication, by telephone, electronic, in person or otherwise, this information will be held in line with local regulatory requirements which will either be 5 years or 10 years after our business relationship with you has ended. Where you have opted out of receiving marketing communications we will hold your details on our suppression list so that we know you do not want to receive these communications.

9 INFORMATION SECURITY

We take precautions to ensure the security of your personal information and strive to keep it accurate and up to date. We carefully protect your personal information from loss, destruction, falsification, manipulation, and unauthorised access or unauthorised disclosure and have developed and will maintain security procedures to safeguard Personal Information against loss, theft, copying, and unauthorised disclosure, use or modification. Access to Personal Information is restricted to employees and authorised service providers who need it to perform their work.

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.

10 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.

11 USE OF WEB BEACONS

Some pages on our website may contain electronic images known as web beacons (sometimes known as clear gifs) that allow us to count users who have visited these pages. Web beacons collect only limited information which includes a cookie number, time and date of a page view, and a description of the page on which the web beacon resides. We may also carry web beacons placed by third party advertisers. These beacons do not carry any personally identifiable information and are only used to track the effectiveness of each campaign.

12 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, Singapore, 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.

13 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. 25 Finsbury Circus, London EC2M 7EE or email us at info@hiroseuk.com.