

RECORD OF PROCESSING ACTIVITIES

HIROSE FINANCIAL UK LIMITED

FRN: 540244

PRIVATE AND CONFIDENTIAL

Record of Processing Activities under Article 30 of the GDPR

Name and contact details of the Controller:	Hirose Financial UK Ltd. 25 Finsbury Circus, London EC2M 7EE
Name and Contact Details of the Officer:	Shion Ikizake s.ikizake@hiroseuk.com
Purposes of the Processing:	<p>We process personal information to enable us to provide a range of the online financial trading services to the retail and corporate customers which include:</p> <ul style="list-style-type: none">◆ To verify customers' identity and establish and manage customers' account◆ To provide customers with products and services, or information about our products and services, and to review customers' ongoing needs◆ To help us improve our products and services, including customer services, and develop and market new products and services◆ To maintain customers' personal profile and administer membership records◆ To investigate or settle enquiries or disputes◆ To comply with applicable law, court order, other judicial process, or the requirements of any applicable regulatory authorities◆ To provide references about our customers◆ To send customers surveys◆ To maintain our own accounts and records◆ To support and manage our employees including the payroll and other benefits

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	<ul style="list-style-type: none">◆ To manage our property◆ To provide our employees with training◆ corporate administration and all activities we are required to carry out as a data controller and public authority◆ internal financial support and corporate functions◆ management of information technology systems◆ To produce and distribute printed material◆ To send promotional communications about the services we provide◆ To enable us to buy, sell, promote and advertise our products and services◆ any duty or responsibility of the local authority
Description of the categories of data subjects:	<p>We process personal information about:</p> <ul style="list-style-type: none">◆ customers◆ suppliers◆ staff, persons contracted to provide a service◆ claimants◆ staff across the group◆ complainants, enquirers or their representatives◆ professional advisers and consultants◆ landlord◆ representatives of other organisations
Categories of personal data:	<p>We process information relevant to the above reasons/purposes which may include:</p> <ul style="list-style-type: none">◆ personal details◆ trading experience◆ financial details◆ employment and education details◆ personal identification documents◆ business activities

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	<ul style="list-style-type: none">◆ case file information◆ Individual contact details
Categories of recipients to whom personal data have been or will be disclosed	<p>Where allowed by law, necessary, or required by law we may share information with:</p> <ul style="list-style-type: none">◆ customers◆ hirose group employees◆ accountant◆ service providers◆ governmental organisations◆ local and central government◆ ombudsman and regulatory authorities◆ professional advisers and consultants◆ landlords◆ data processors◆ payment providers including banks and e-wallets
Transfers of personal data to a third country & safeguards:	<p>With the consent of our data subject, the personal data may be transferred 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)</p>
Time limits for erasure:	<p>See Hirose Financial UK Ltd. Privacy Policy.</p>
Technical and organisational security measures: (Art 32)	<p>We take organisational security measures such as, but not limited to:</p> <ul style="list-style-type: none">◆ encryption◆ pseudonymisation◆ anonymization◆ BCP and resilience planning including backups◆ robust security updates including anti-virus software◆ user access controls◆ physical security clear desk policy◆ Penetration Testing◆ Risk assessment

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	<ul style="list-style-type: none">◆ Staff training◆ Contractual requirements
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