

HF Markets (SV) Ltd

PRIVACY POLICY

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1. Introduction

- 1.1. HF Markets (SV) Ltd (herein the “**Company**” or “**we**”) which is a member of the HFM Group, is incorporated under the laws of Saint Vincent and the Grenadines with Registration 22747 IBC 2015. The Company is authorised as an International Business Company under the International Business Companies (Amendment and Consolidation) Act, Chapter 149 of the Revised Laws of Saint Vincent and Grenadines, 2009 (herein the “**Law**”).
- 1.2. This privacy statement covers the website www.hfm.com and all its related sub-domains and mobile applications that are registered and operated by the Company.
- 1.3. The Company outlines in the Privacy Policy (herein the “**Policy**”) how the Company collects, maintains, uses and discloses personal information of the Client.
- 1.4. This Policy applies to existing clients, prospective clients, clients who have terminated their contractual relationship with the Company and website visitors (herein jointly referred to as the “**Clients**” or “**you**”) who are accessing or using the Company’s website(s) and mobile applications (herein referred to as the “**Platforms**”).
- 1.5. The Company is committed to protecting the privacy of all Clients’ Personal Data which it processes in accordance with the provisions of this Policy and the Company’s Client Agreement.
- 1.6. For the purposes of this Policy, references to “Personal Data” shall mean data which identifies or may identify Clients and which may include, for example, a Client’s name, address, identification number, telephone number and date of birth.

2. Collection of Personal Data

- 2.1. The Company collects different types of Personal Data through the Company’s Platforms from Clients who visit such Platforms or access, use or request products and services offered by the Company.
- 2.2. The provision of certain Personal Data is required for establishing a contractual relationship with the Company. Clients not wishing to provide such Personal Data will not be able to

open an account with the Company or be provided with other products and/or services of the Company.

- 2.3. Clients have a responsibility to ensure that the Personal Data they provide to the Company by themselves or through a third party and recorded in their personal account (Client Area) remain accurate and up to date throughout the period of their contractual relationship with the Company.
- 2.4. In addition to the information provided by Clients, the Company also lawfully collects and processes Personal Data from publicly available sources (including, inter alia, the press, social media and the internet) and third-party compliance databases for fraud prevention and KYC verification .
- 2.5. The Personal Data received from the Client, collected and processed by the Company are required for the communication, identification, verification and assessment for the business relationship establishment with the Client, contract performance, legitimate interest and legal compliance. The following Personal Data may be collected from Clients depending on the product and/or service the Company provides to him:
 - (a) Contact details such as the Client's name, e-mail address and phone number.
 - (b) Identification details such as the Client's identification or passport number.
 - (c) Biographical and demographic data such as gender, age, ethnicity, education, occupation, the Client's financial trading experience and whether he has a prominent public function status (PEP).
 - (d) Financial information such as the Client's income status, bank account number and account details, tax information and other financial information.
 - (e) Information relevant to the services that the Company provides to the Client such as the Client's transactions and communication records with the Company.
 - (f) Details of visitors' and Clients' visits to the Company's website and information collected through cookies and other tracking technologies including IP address and domain name, browser version, operating system and geolocation.

- (g) Information in relation to criminal convictions and offences to the extent required and/or permitted by applicable law.
 - (h) Information in relation to the client's mobile device Call log with the permission of the client.
 - (i) Your marketing preferences.
 - (j) Data derived from your activity.
 - (k) Information and logs from your interactions with the conversational AI Bots.
- 2.6. Specific Google User Data Disclosure: When you choose to authenticate or link your account using Google Services, we specifically collect: Your Google email address and basic profile information (such as your name, profile picture, User Id, date of birth). This data is used solely for Account Management to uniquely identify your user profile and provide a seamless login experience via the Google OAuth service.

3. No Children's Data Collection

- 3.1. The Company understands the importance of protecting children's privacy. The Company's services are not intended for children under eighteen (18) years of age nor is the Company's website designed for use by children. Therefore, the Company does not knowingly or specifically collect children's personal data. If the Company collects such data mistakenly or unintentionally, the Company shall delete the information at the earliest possible once it obtains knowledge thereof. If the Client becomes aware of such data collection he/she shall notify the Company at privacy@hfm.com.

4. Use of Personal Data

- 4.1. The Company collects and processes Personal Data which are required for the evaluation, establishment and maintenance of the contractual relationship between the Company and the Client and in order to comply with the Policy and applicable laws and regulations governing the provision of financial services. In some cases, the Company may also process the Client's Personal Data to pursue its legitimate interests or those of third parties,

provided that the Clients' interests and fundamental rights are not overridden by those of the Company or the third party.

4.2. Specifically, the Client's Personal Data will most commonly be used in the following circumstances:

(a) Where the Company needs to perform the contract it has entered with the Client or in order to take certain steps prior to entering into a contract with the Client

Processing is necessary for the Company in order to provide the Client with its products and services, and more specifically in order:

- To verify the Client's identity and carry out any required credit checks;
- To ensure that the Client meets the suitability requirements to use the Company's products and services;
- To manage the account the Client holds with the Company;
- To process the Client's transactions; and
- To send to the Client any information about transactions/post-transactions services.

If the Client does not provide the requested Personal Data, the Company may be unable to offer the Client with its products and/or services.

(b) Where the Company needs to comply with a legal obligation

The Company may be required to comply with certain legal and regulatory obligations which may involve the processing of Personal Data. Such obligations and requirements impose on the Company necessary data processing activities for identify verifications, compliance with court orders, tax law or other reporting obligations and anti-money laundering controls.

(c) Where the Company has legitimate interests to use the Client's Personal Data

More specifically, the Company may process the Personal Data for the following purposes:

- To develop or enhance its products and services;
- To enhance the security of the Company's network and information systems;

- To identify, prevent and investigate fraud and other unlawful activities, unauthorised transactions and other liabilities and manage risk exposure;
- To maintain its accounts and records;
- To manage its business operations and comply with internal policies and procedures;
- To defend, investigate or prosecute legal claims;
- To receive professional advice (such as legal advice);
- To measure campaign effectiveness;
- For the analysis of statistical data which helps the Company in providing its Clients with better products and services in the future. It should be noted that the Company anonymises and aggregate such data so that they do not directly or indirectly reveal the Clients' identities. The Company may provide this statistical data to third parties (as described in more detail in Section 8) solely for statistical purposes and in an effort to improve the Company's marketing campaign;
- To measure campaign effectiveness;
- To provide AI-powered analytics: The Company uses proprietary machine learning modules to analyse commercial metrics;
- To collect reviews/feedback for improving the services of the Company.

(d) Where the Client has given his consent

- The Company will ask for the Client's consent when the Company wishes to provide marketing information to its Clients in relation to its products or services which may be of interest to the Client.
- The Company will ask for Clients' permission to access their mobile device call log for the sole purpose of completing the phone number verification process.
- The Company will ask for Clients' permission to electronically verify their identity by providing their personal information to identity verification providers.
- The Company will obtain the Client's prior consent in any other circumstance where such consent is required by law or deemed necessary by the Company.

The Client may withdraw such consent at any time. This right doesn't affect the lawfulness of processing that was based on that consent before its withdrawal.

- 4.3. Google API Limited Use Compliance: Our use and transfer of information received from Google APIs will adhere to the Google API Services User Data Policy.

5. Cookies

- 5.1. A cookie is a small text file that is stored on a user's computer for record-keeping purposes. The Company uses cookies on its website(s) to ensure and provide the Client with a good experience when he browses our website and also allows us to improve our website.
- 5.2. To understand more about the kind of cookies we use and how you can control and delete cookies, please see our Cookie Policy.

6. Links to other websites

- 6.1. The Company's website contains or may contain links to other websites or social media platforms of interest. However, once you have used these links to leave the Company's website, you should note that the Company does not have any control over those other websites. Therefore, the Company cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this Policy. You should exercise caution and look at the privacy statement applicable to the website in question.
- 6.2. The Company will not be liable for the unlawful or unauthorized use of the Client's Personal Data due to misuse and/or malicious use and/or negligence and/or misplacement of the Client's passwords either by him/her or any third party.

7. Client Records Retention Periods

- 7.1. Under the applicable laws and regulations, the Company is required to keep records containing Client Personal Data, trading information, account opening documents,

communications and anything else which relates to the Client for 7 (seven) years after the execution of the last transaction or the termination of the business relationship.

8. Sharing and Disclosure of Personal Data

8.1. In the course of the performance of the Company's contractual and statutory obligations, the Client's Personal Data may be disclosed to third parties. Most of such third parties enter into contractual arrangements with the Company by which they observe data protection and confidentiality.

8.2. Under the circumstances referred to above, recipients of Personal Data may be, for example:

- (a) third party payment service providers who help the Company provide its Clients the services of securely deposit and withdrawal to and from a Client's account;
- (b) other service providers that the Company has chosen to support it in the effective provision of its products and services by offering technological expertise, solutions and support;
- (c) governmental and regulatory bodies, including law enforcement authorities and FSB, in connection with enquiries, proceedings or investigations by such parties or in order to enable the Company to comply with its legal and regulatory requirements;
- (d) credit reference and fraud prevention agencies, third party authentication service providers and other financial institutions for the purposes of credit checking, fraud prevention and anti-money laundering controls;
- (e) third party service providers for the provision of the required customer support services through live chat and the Company's website visits and traffic monitoring through cookies;
- (f) external consultants including legal and tax consultants;
- (g) data reporting service providers;
- (h) market research companies and call centers;
- (i) affiliates of the Company; and
- (j) AI Technology Providers.

- 8.3. In accordance with the recommendations of Payment Card Industry Security Standards Council, customer card details are protected using Transport Layer encryption — TLS 1.2 and application layer with algorithm AES and key length 256 bit.
- 8.4. Google Data Sharing Restrictions: Notwithstanding any general data sharing practices mentioned in Section 8, any Personal Data obtained through Google API Services will not be shared with third, or any other external parties unless strictly necessary to provide the core functionality of the app and only if those parties adhere to the same "Limited Use" restrictions required by Google. All Personal Data collected from Google API Services are encrypted in transit.
- 8.5. The Company does not collect, store or process any personal credit or debit card information. All payment transactions are processed through payment services providers.

9. Business Transfers Legal Requirements

- 9.1. If the Company is involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of company assets, or transition of service to another provider, Client's Personal Data and other information may be transferred to a successor or affiliate as part of that transaction along with other assets.

10. Marketing Communications – Services Subscriptions Preferences

- 10.1. The Company may process Personal Data to tell its Clients about products, services and offers that may be of interest to the Client. The Company may only process such Personal Data if it has obtained the Client's consent to do so.
- 10.2. If the Client no longer wishes to receive any promotional communications, he may opt-out of receiving them by following the instructions included in each communication or by updating his email subscription preferences within the Client account area.

11. Automated decision-making and profiling

11.1. When you make an application for account opening we will use systems to make an automated assessment of your knowledge and experience through the evaluation of an appropriateness test.

12. Artificial Intelligence and Machine Learning (AI)

12.1. The Company utilizes proprietary and third-party artificial intelligence (AI) and machine learning (ML) technologies (hereinafter “AI tools”) to provide enhanced services to the Clients.

12.2. These AI tools are used based on our Legitimate Interests to improve platform efficiency, provide state-of-the-art analytical tools, and enhance the user experience for the Clients.

12.3. The AI tools are designed to support, not replace, human decision-making. The Company implements safeguards to ensure that AI-generated insights do not result in automated decisions with significant effects without appropriate human review.

13. Confidentiality and Security of Personal Data

13.1. Personal Data which the Company holds is to be treated by the Company as confidential and will not be used for any purpose other than those specified in this Policy.

13.2. Any Personal Data that the Client provides to the Company will be treated as confidential and shared only with the parties set out in Section 8 of this Policy.

13.3. Such Personal Data will not be disclosed to any other third party except if such disclosure is required under any regulatory or legal proceedings.

13.4. The Personal Data that the Client provides in connection with registering as a user of the website(s) or for the Services is classified as Registration Information. The Company offers high protection of the Registration Information provided by the Client. The Client can access his Registration Information through a password selected by him which is encrypted and known only to the Client. The Client must be careful and protect his password from any third parties. Registration Information is safely stored on secure servers that only

authorized personnel have access to via password. The Company encrypts all Personal Data as it is transferred to the Company and thus makes all necessary effort to prevent unauthorized parties from viewing any such information.

- 13.5. Personal Data provided to the Company that is not Registration Information also resides on secure servers and is again accessible only to authorized personnel via password. This information is not accessible by the Client; therefore, no password is provided to view or modify this information.

14. Amendments to this Policy

- 14.1. The Company reserves the right to review and amend this Policy from time to time for any reason and notify the Clients of any such amendments accordingly by posting an updated version of this Policy on the Company's website(s). The Company will notify you about any material changes to this Policy by placing a notice on its website or by communicating with you directly.

- 14.2. The Client is responsible for regularly reviewing the Policy and any amendments thereof.

15. Enquiries and Contact Details

- 15.1. For any general enquiries regarding this Policy or questions about how the Company processes Client's Personal Data, please contact us at privacy@hfm.com.

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