

# Privacy Policy for CFSG

## 1. Scope

This Privacy Policy explains what you can expect from us and what we need from you in relation to your personal data. Please read this carefully as this Notice is legally binding when you use our CFSG Services, as defined below.

This Privacy Policy applies to any CFSG Services, as defined below, regardless of how you access or use them, including through mobile devices.

We may amend this Privacy Policy at any time by posting the amended version on this site including the effective date of the amended version. Any changes or updates to this Privacy Policy will be posted on this page.

## 2. Definitions

2.1. As used herein, the following terms are defined as follows:

2.1.1 "CFSG Account" means a user-accessible account offered via the CFSG Services.

2.1.2 "CFSG Services" means CFSG-branded websites, applications, services, or tools operated by CFSG companies.

2.1.3 "CFSG," "We," and "Us" refers to CASH Financial Services Group Limited and/or its subsidiaries (also referred to collectively as "CFSG," "we," or "us").

2.1.4 "Personal Information" or "Personal Data" or "your data" refers to any information relating to you, as an identified or identifiable natural person, including your name, an identification number, location data, or an online identifier or to one or more factors specific to the physical, economic, cultural or social identity of you as a natural person.

## 3. Your data controller

CFSG provides the CFSG Services through local operating entities that are subsidiaries of CFSG, Inc. as follows:

CASH Financial Services Group Limited,  
9/F, Low Block,  
Grand Millennium Plaza  
Hong Kong

The CFSG company you are contracting with is your data controller, and is responsible for the collection, use, disclosure, retention and protection of your personal information in accordance with our global privacy standards, this Privacy Policy, as well as any applicable national laws. The CFSG companies use encryption to protect your information and store decryption keys in separate systems. Data controllers process and retain your personal information on our servers where our data centers are located.

Where we have a legal obligation to do so, we have appointed Personal Data Officers to be responsible for CFSG's privacy program for the respective data controllers. If you have any questions about how we protect or use your Personal Information, you can contact us by writing to the Personal Data Officer by post to 9/F, Low Block, Grand Millennium Plaza, 181 Queen's Road Central, Hong Kong or by email at [hotline@cfsg.com.hk](mailto:hotline@cfsg.com.hk).

#### **4. How do we protect your personal information?**

We are serious about guarding the privacy of your Personal Information and work hard to protect CFSG and you from unauthorized access to, or unauthorized alteration, disclosure, or destruction of Personal Information we collect and store. Measures we take include encryption with SSL; the availability of two-factor authentication at your discretion, and periodic review of our Personal Information collection, storage, and processing practices. We restrict access of your Personal Information only to those CFSG employees, affiliates, and subcontractors who have a legitimate business need for accessing such information. We continuously educate and train our employees about the importance of confidentiality and privacy of client information. We maintain physical, electronic, and procedural safeguards that comply with the relevant laws and regulations to protect your Personal Information from unauthorized access.

Unfortunately, despite best practices and technical safeguards, the transmission of information via the internet is not completely secure. Although we do our best to protect your Personal Data, we cannot guarantee the security of your Personal Data during transmission, and any acts of transmission are at your own risk.

#### **5. Information we may collect about you**

##### **5.1. Information you give us.**

When using the CFSG Services, we may collect and use the following data about you:

- full legal name;
- home address, including country of residence;
- email address;
- mobile phone number;
- date of birth;
- proof of identity (e.g., driver's license, passport, or government-issued identity card);
- comparable identification number issued by a government; and
- other Personal Information or commercial and/or identification information – whatever information we, in our sole discretion, deem necessary to comply with our legal obligations under various anti-money laundering (AML) obligations, such as under the European Union's 4th AML Directive and the U.S. Bank Secrecy Act (BSA).

##### **5.2. Information we collect about you automatically.**

- location Information – information that is automatically collected via analytics systems providers to determine your location, including your IP address and/or domain name and any external page that referred you to us, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system, and platform;
- log Information – information that is generated by your use of CFSG Services that is automatically collected and stored in our server logs. This may include, but is not limited to, device-specific information, location information, system activity and any internal and external information related to pages that you visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our Website or App (including date and time; 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;

- account Information – information that is generated by your CFSG account activity including, but not limited to, instructions regarding funding and disbursement, orders, trades, and account balances;
- your transactions with or through the CFSG platform, such as your account balance, trading activity, and account history
- details about your external bank or financial services accounts.
- information you allow us to receive through device settings you turn on, such as access to your photos
- correspondence – Information that you provide to us in written or oral correspondence, including opening a CFSG account, and with respect to ongoing customer support; and logging of phone numbers used to contact us.

### 5.3. Information we receive about you from other sources.

We may receive information about you if you use any of the other websites we operate or the other services we provide. We are also working closely with third parties and may receive information about you from them. For example:

- The banks you use to transfer money to us will provide us with your basic personal information, such as your name and address, as well as your financial information such as your bank account details;
- Business partners may provide us with your name and address, as well as financial information;
- Advertising networks, analytics providers and search information providers may provide us with anonymized or de-identified information about you, such as confirming how you found our website;
- Credit reference agencies do not provide us with any personal information about you, but may be used to corroborate the information you have provided to us.

### 5.4. General Provisions

Personal Information you provide during the registration process may be retained, even if your registration is left incomplete or abandoned. If you are located within the EEA, this Information will not be retained without your consent.

In providing the personal data of any individual (other than yourself) to us during your use of the CFSG Services, you promise that you have obtained consent from such individual to disclose his/her personal data to us, as well his/her consent to our collection, use and disclosure of such personal data for the purposes set out in this Privacy Policy.

## 6. Uses of Personal Data

Below we set forth a description of all the ways we use your personal data as stated above, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are, where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Written request could be directed to the Personal Data Officer by post to 9/F, Low Block, Grand Millennium Plaza, 181 Queen's Road Central, Hong Kong or by email at [hotline@cfsg.com.hk](mailto:hotline@cfsg.com.hk) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out below.

What we use your personal information for

- day-to-day operation and maintenance of accounts
- providing services and credit facilities to Clients;
- giving effect to the Instructions, and carrying out the Client's other instructions;
- providing services in connection with the Account, whether the services are provided by or through, any member of CFSG or any other person;
- conducting credit inquiries or checks on the Client and ascertaining the Client's identity, financial situation and investment objectives, and enabling or assisting any other person so to do;
- ensuring ongoing credit worthiness of Clients;
- collection of amounts due, enforcement of security, charge or other rights and interests in favour of any member of CFSG;
- determining the amount of indebtedness owed to or by Clients;
- marketing existing and future services or products of any member of CFSG or any of its business partners. These services or products may be provided and/or marketed by:
  - a. CFSG and its associated companies;
  - b. third party financial institutions, securities and investment services providers;
  - c. third party reward or privileges program providers;
  - d. co-branding partners of CFSG and its associated companies.
- understanding our customers and their needs
- designing and personalizing financial services or financial products for Client's use;
- forming part of the records of the persons or members of CFSG to whom the data may be passed;
- any actual or proposed assignment or transfer of the shares of CFSG;
- monitoring and analyzing visitor traffic, behavior and statistics;
- Providing personalized information and news to Clients;
- managing our global websites and services;
- complying with our regulatory, legal and ethical obligations, the request of any Regulatory Body (including warrants, subpoenas, court orders, or with a regulator or law enforcement agency request, and in connection with criminal investigations or to meet government tax reporting requirements) or other requirements to which any member of CFSG or any other persons may be subject;
- investigating any suspicious activities;
- contacting you or responding to your inquiries and comments;
- protecting our rights and property; and
- other purposes relating or incidental to any one or more of the above.

We may from time to time collect personal data from visitors to our websites and individuals who participate in a promotion, contest or survey. If you decide to withhold certain information, it may limit our ability to provide you with the Services and/or your ability to use the CFSG Services.

CFSG may use the data you supplied for direct marketing purpose. You may in written request, without charges to you, CFSG to cease to use the data for such purpose. Written request could be directed to the Personal Data Officer by post to 9/F, Low Block, Grand Millennium Plaza, 181 Queen's Road Central, Hong Kong or by email at [hotline@cfsg.com.hk](mailto:hotline@cfsg.com.hk)

## 7. Disclosure of your personal information

7.1. We may share your personal information with selected third parties including:

- any other member of CFSG;
- any nominee in whose name Securities or other asset may be registered;
- any contractor, agent or service provider which provides administrative, data processing, financial, computer, telecommunications, payment or securities clearing, financial, professional or other services to any member of CFSG or to any other person to whom data is passed;
- any person making any payment into the Client's account (deposit confirmation provided to the person making the payment may contain Client's information);
- any person with whom the Company enters into or proposes to enter into transaction on the Client's behalf, or persons representing the same;
- the drawer bank providing a copy of a paid cheque (which may contain information about the payee) to the drawer;
- any assignee, transferee, participant, sub-participant, delegate, successor or person to whom the Account is transferred;
- any business partner of any member of CFSG; and
- governmental, regulatory or other bodies or institutions, whether as required by law, regulations applicable to any member of CFSG, or otherwise.
- analytics and search engine providers that assist us in the improvement and optimization of our site; and

7.2. We may disclose your personal information to third parties when:

- We sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets in order to continue the services for which you have contracted;
- We are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Terms of Service and other applicable agreements; or to protect the rights, property, or safety of CFSG, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction;
- We conduct or cooperate in investigations of fraud or other illegal activity whenever we believe it is reasonable and appropriate to do so;
- We seek to prevent and detect fraud and crime;
- We receive a lawful subpoena, warrant, court order, or as otherwise required by law;
- We seek to protect CFSG from financial and insurance risks;
- We seek to recover debt or in relation to your insolvency; and
- We seek information necessary to maintain or develop customer relationships, services and systems.

7.3. We do not maintain a published list of all of the third parties with whom we share your personal information with, as this would be heavily dependent on your specific use of our Services. However, if you would like further information about who we have shared your personal information with, or to be provided with a list specific to you, you can request this by writing to the Personal Data Officer by

post to 9/F, Low Block, Grand Millennium Plaza, 181 Queen's Road Central, Hong Kong or by email at [hotline@cfsg.com.hk](mailto:hotline@cfsg.com.hk)

We do not disclose your personal data to other parties other than to members of CFSG and trusted third parties (including financial partners and banking institutions) who assist us in our provision of the Services to Users (including to parties that provide administrative, telecommunications, computer, trade execution, payment or clearing, prepare and mail account statements, transaction confirmations and other services in connection with the Services) on the basis that those parties agree to keep your information confidential. We may also release your personal data to non-affiliated third parties at your direction or for which you have provided your express consent, or if required by law, regulation or any Regulatory Body (such as the Hong Kong Internal Revenue Department, the Hong Kong Customs and Excise Department and other international data protection authorities). We may also share US residents' personal information with other financial institutions as authorised under Section 314(b) of the US Patriot Act, and with law enforcement or tax authorities, including the US Internal Revenue Service (pursuant to the Foreign Account Tax Compliance Act, "FATCA") and the US FinCEN. FATCA reporting to the IRS may also apply to US nationals residing abroad.

## **8. Where we store your personal data**

Our operations are supported by a network of computers, servers, and other infrastructure and information technology, including, but not limited to, third-party service providers. We and our third-party service providers store and process your personal data in Hong Kong, and elsewhere in the world.

Your personal information may be transferred to or processed in Hong Kong by us or a third party service provider working for us, or by one of the members of the group. By submitting personal information via our website or other means, you agree to such storage, transfers and processing. We take all appropriate steps to store and protect your personal data. All personal data that is not directly related to our business or upon fulfilment of the purpose for which it was retained will be deleted after a reasonable period of time.

We implement physical, electronic, and procedural safeguards to protect your personal data. Our servers are secured and all details are transmitted via Secure Sockets Layer (SSL) and/or Transport Layer Security (TLS) technology to prevent access from unauthorised parties. Further, we use digital certificate services to authenticate the identity of any transactions on our website and applications.

We also conduct regular internal evaluations of our business practices and procedures in order to protect your personal data.

## **9. Sharing your data outside of the EEA**

In order to provide our Services to you, it is sometimes necessary for us to transfer your data to the third parties outlined in section 7.1 that are based outside of the European Economic Area ("EEA"). In these cases, we ensure that both ourselves and our partners take adequate and appropriate technical, physical,

and organizational security measures to protect your data. We also ensure we have appropriate contractual protections in place with these third parties.

By using CFSG Services, you consent to your Personal Data being transferred to other countries, including countries that have different data protection rules than your country. In all such transfers, we will protect your personal information as described in this Privacy Policy and in a manner consistent with the principles of the EU-US and Swiss-US Privacy Shield framework. For more information, please contact us by writing to the Personal Data Officer by post to 9/F, Low Block, Grand Millennium Plaza, 181 Queen's Road Central, Hong Kong or by email at [hotline@cfsg.com.hk](mailto:hotline@cfsg.com.hk)

## **10. Profiling and automated decision making**

We may in some instances use your personal data, such as your country of residence and trade history, in order to better address your needs. For example, if you frequently trade in a specific stock, we may use this information to inform you of new product updates or features that may be useful for you. When we do this, we take all necessary measures to ensure that your privacy and security are protected.

We may use Automated Decision Making (ADM) in order to improve your experience, or to help fight financial crime. For example, so that we can provide you with a fast and efficient service, we may use ADM to verify your identity documents, or to confirm the accuracy of the information you have provided to us. None of our ADM processes have a legal effect on you.

## **11. Data Retention**

As CFSG and its affiliates are subject to various legal, compliance and reporting obligations, including BSA or national AML requirements (as defined above), we are required by law to store some of your personal and transactional data beyond the closure of your account with us. Your data is only accessed internally on a need to know basis, and it will only be accessed or processed if absolutely necessary. We will delete data that is no longer required by any relevant law or jurisdiction in which we operate.

## **12. Cookies**

When you use CFSG Services, we may make use of the standard practice of placing tiny data files called cookies, flash cookies, pixel tags, or other tracking tools (herein, "Cookies") on your computer or other devices used to visit CFSG Services. We use Cookies to (i) help us recognize you as a customer, collect information about your use of CFSG Services to better customize our services and content for you, and to collect information about your computer or other access devices as part to ensure our compliance with our BSA and AML obligations and (ii) ensure that your account security has not been compromised by detecting irregular or suspicious account activities.

We use both session and persistent Cookies. Session Cookies expire when you log out of your account or close your browser. Persistent Cookies remain on your computer or mobile device until deleted or otherwise expire. Most web browsers are set to accept Cookies by default. You are free to decline most of our session Cookies if your browser or browser add-on permits but choosing to remove or disable our Cookies may interfere with your use and functionality of the CFSG Services.

CFSG may use web analytic service and tools developed by us or provided by Third Party Providers (e.g. Google Analytics provided by Google, Inc.) on the Site and mobile app to help us monitor and analyze visitor traffic, behavior and statistics on the Site and mobile app. To do so, Google Analytics mainly uses first-party cookies, which store non-personally identifiable information, to report to us on user interactions on the Site and mobile app. For more details on Google Analytics, please visit [www.google.com/analytics/](http://www.google.com/analytics/)

### **13. Your choices**

- Email Communications – Subject to applicable laws and regulations, we may from time to time send communications promoting services, products, facilities, or activities to you using information collected from you. When you create a CFSG Account you are agreeing to opt-in to all communications from us. We will provide you with an opportunity to opt-out of newsletter communications. We will never provide your Personal Information to third parties for direct marketing or other unrelated purposes without your written consent. Unfortunately, we are unable to allow you to opt-out of the emails we send you for certain legal or administrative purposes.
- Cookies – You may decline session cookies if your browser or browser add-on permits but choosing to remove or disable our cookies may interfere with your use and functionality of the CFSG Services.
- Right of Rectification– You have the right to correct any personal information We hold on you that is inaccurate, incorrect, or out of date.
- Right of Erasure – You have the right to ask us to delete your data when it is no longer necessary, or no longer subject to a legal obligation to which CFSG is subject to.
- Portability – You may have the right to transfer certain of your personal data between data controllers, for example, to move your account details from one online platform to another.
- Location Information – You may be able to stop the collection of location information through your device settings or by following the standard uninstall process to remove our applications from your device; however, because such data is used by us to meet legal requirements, as well as for ongoing fraud and risk monitoring purposes, choosing to remove or disable location services may interfere with your use and functionality of the CFSG Services.

### **14. Access to information**

Subject to applicable laws, you may have the right to access information we hold about you. Your right of access can be exercised in accordance with the relevant data protection legislation. For further information, please contact the Personal Data Officer by post to 9/F, Low Block, Grand Millennium Plaza, 181 Queen’s Road Central, Hong Kong or by email at [hotline@cfsg.com.hk](mailto:hotline@cfsg.com.hk)

You are permitted under the Personal Data (Privacy) Ordinance (Cap. 486) to access your personal information we hold about you. You may request such access by completing the Data Access Request Form as specified under section 67 of the Personal Data (Privacy) Ordinance (Cap. 486) and sending to the Personal Data Officer by post to 9/F, Low Block, Grand Millennium Plaza, 181 Queen’s Road Central, Hong Kong or by email at [hotline@cfsg.com.hk](mailto:hotline@cfsg.com.hk). There may be circumstances where we are unable to provide access to all of your personal information. We may deny or restrict access for legally



permissible reasons, such as situations where the information contains references to other individuals and is not reasonably severable, or where it cannot be disclosed for legal, security, or commercial proprietary reasons. We will advise you of any reason for denying or restricting an access request to the extent permitted by law, rule or regulation. CFSG may charge a reasonable fee for processing your data request.

## **15. Online Security**

In addition to our security measures, you can also take steps to maximize your security online and to protect your confidential information. We encourage you to use strong passwords with mix of uppercase, lowercase, numbers and special symbols. Our support teams will never ask you for your personal details such as username or identification number via email and we will never ask for your password.

## **16. Protection of Minors**

CFSG Services are not directed to persons under the age of 18, hereinafter “Minors” and we do not knowingly collect personal information from Minors. If we learn that we have inadvertently gathered personal information from a Minor, we will take legally permissible measures to remove that information from our records. CFSG will require the user to close his or her account and will not allow the use of CFSG Services. If you are a parent or guardian of a Minor, and you become aware that a Minor has provided personal information to CFSG, please contact us by post to 9/F, Low Block, Grand Millennium Plaza, 181 Queen’s Road Central, Hong Kong or by email at [hotline@cfsg.com.hk](mailto:hotline@cfsg.com.hk) and you may request to exercise your applicable access, rectification, cancellation, and/or objection rights.

## **17. Contact**

Any questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to the Personal Data Officer by post to 9/F, Low Block, Grand Millennium Plaza, 181 Queen’s Road Central, Hong Kong or by email at [hotline@cfsg.com.hk](mailto:hotline@cfsg.com.hk)

If you feel that we have not addressed your questions or concerns adequately, you may contact your data controller.

The Personal Data Officer  
CASH Financial Services Group Limited,  
9/F, Low Block,  
Grand Millennium Plaza  
Hong Kong