

## **Privacy Policy**

Your privacy is of paramount importance to us. At Hantec Markets, we protect the personal data and confidentiality of the information and respect the privacy rights of our existing and prospective customers.

Hantec Markets collects data to operate effectively and provide you with a valuable service while ensuring that your needs are met. Where your personal data is provided to Hantec Markets Limited in connection with us providing or offering products or services to you if you are an individual located in Europe, please note the following.

This privacy notice explains what personal data we collect from you in connection with the provision or offering of our products or services to you or from your use of our products and services, as well as through our interactions with you through our website or applications. This notice also outlines how the data that we collect is used.

### **Data Controller**

This Privacy Notice applies to the data processing activities carried out by Hantec Markets Limited who acts as a Data Controller of your personal information.

If you have any questions about this notice or wish to exercise your rights about your personal information, please get in touch with us:

- Call: +41 225 510215
- Email: [info@hmarkets.com](mailto:info@hmarkets.com)

### **What Type of Personal Data We Collect and How We Collect It?**

The data we collect depends on the context of your interactions with us, the choices you make, including the products and services you use or wish to start using. The data we collect about you can include the following:

- Name and contact data: We collect your full name, email address, personal postal address, phone number, and other similar contact data.
- Demographic data: We collect data about you, such as your date and place of birth, gender, country, and preferred language.
- Location data: For certain products and services, we collect imprecise data about your location that includes, for example, a location derived from your IP address.
- Profession and employment details: We collect details of your employment and your source of income.
- Government-issued photographic identification: We collect copies of passports, national ID cards, driving licenses and other acceptable forms of ID that contain photos.
- Financial and tax information: We collect information about your income, assets and liabilities, balances of your accounts, trading and financial statements, bank details, tax identification numbers and other identification numbers used for tax purposes.
- Trading information: We keep records of products you trade with us and their performance.
- Credentials: We collect passwords, password hints, and similar security information used for authentication and account access.
- Content: We collect the content of all telephone conversations and electronic communications between us that result in placing and/or closing an order or a trade, including communications that are intended to result in placing and/or closing an order or a trade, irrespective of the outcome.
- We collect the content of files and communications we receive from you when necessary to provide you with the products and services you use or intend to use. This includes files and communications sent and received by us via Outlook, our Client Portal and by post.
- We also gather the information you provide to us and the content of messages you send to us, such as feedback and service reviews you write or questions and information you provide for customer support. When you contact us, such as for

customer support, phone conversations or chat sessions with our business development team may be monitored and recorded.

You provide this data directly, such as when you apply for an account with Hantec Markets, sign up for a demo, request access to MultiTerminal, fill in contact forms, inquire about Hantec Markets products and services, sign up for a webinar or to receive market research, analysis and reports, subscribe to news and updates, and in the course of customer service correspondence.

We may also collect your personal information through IB referral schemes or from publicly available sources.

We obtain some personal information through your use of our website or through the use of cookies and other tracking technologies on our website, in particular by recording which pages you browse on our website.

Cookies are small pieces of information sent by a web browser so they can later be read back from that browser. Cookies may be used on some pages of our Online Platform and website to provide users with a more customised browsing experience. For further detailed information about cookies and how you can control and delete them, please refer to the Cookies section on our website.

You have choices about the data we collect. When you are asked to provide personal data, you may decline. However, if you choose not to provide information that is necessary to fulfil your request for a specific product or service, we may not be able to provide you or the institution you represent with the requested product or service.

### **How do we use your personal information?**

Hantec Markets uses the data we collect for the following purposes:

- To perform essential business operations (including monitoring and improving ) and provide the products and services we offer;
- To perform administration on the account, you may hold with us on an ongoing basis, including keeping records we hold accurate and up-to-date;

We will process certain personal information about you or your directors, officers, beneficial owners (if applicable) or any other associated employees in order to carry out

anti-money laundering and international terrorist financing checks and related actions which we consider appropriate to meet any legal obligations imposed on us relating to, or to pursue our legitimate interests in relation to the prevention of fraud and other forms of crime (money laundering, terrorist financing, bribery and corruption, tax evasion, cyber-crime) and to prevent the provision of financial and other services to persons who may be subject to economic or trade sanctions. We may also process your information to detect and prevent scalping, market abuse, or any other unethical trading in accordance with our existing policies and procedures.

We use the data to carry out analysis and monitoring that enable us to operate, fulfil our legal and regulatory responsibilities and obligations, including regulatory and supervisory reporting, make informed decisions, and report on the performance of our business. This includes disputes/complaints handling and resolution, reporting tax-related information to tax authorities, record retention for screening purposes, etc., to pursue our and, in some circumstances, our clients' legitimate interests.

To monitor and record telephone conversations and electronic communication for investigation and fraud prevention purposes, for crime detection, prevention, investigation and prosecution, and to enforce or defend our rights, ourselves or through delegation of such responsibilities or rights to third parties in order to comply with a legal obligation imposed on us or to pursue our legitimate interests in relation to such matters or the processing in the public interest.

We use the data we collect to communicate with you and personalize our communications with you. For example, we may contact you by phone or e-mail or other means in order to respond to your query we may receive via our website, e-mail, client portal, chat system or by phone.

To effectively communicate and deliver information to you, including marketing and promotional communications about products and services that may be of interest to you or the institution you represent. Where we send you these communications, we will either do so for the purposes of the legitimate interests pursued by us or with your consent.

For any processing that is necessary to perform a relevant contract with you, comply with our legal obligations and/or which is necessary for our legitimate interests as set out above and/or where processing is necessary for reasons of public interest.

Additionally, you can sign up for email subscriptions and choose whether you wish to receive promotional communications (daily and weekly reports, promotions, new

product offerings, news and announcements, webinars) from Hantec Markets Limited by email.

**Disclosure of personal information**

Your personal data will be treated as strictly confidential and as part of using it for the purposes set out above, we may share your personal information with:

- Other companies within the Hantec Group
- Vendors, service providers and specialist advisers who have been contracted to provide us with administrative, IT, financial, compliance, legal, regulatory, insurance, research or other services and who work on our behalf for the purposes described in this notice and may need access to personal data to provide those functions. Vendors, service providers and specialist advisers who have been contracted to provide us with administrative, IT, financial, compliance, legal, regulatory, insurance, research or other services and who work on our behalf for the purposes described in this notice and may need access to personal data to provide those functions.
- Introducing brokers with whom we have a mutual contractual relationship;
- Anyone authorised by you

We may also disclose personal data to:

- Courts, tribunals, law enforcement or other government agencies, applicable competent authorities as required by law or requested to comply with applicable law for internal investigations and to report or respond to valid legal process;

**Security of Personal Data**

Hantec Markets is committed to protecting the security of your personal data. We use a variety of security technologies and procedures to help protect your personal data from unauthorized access, use or disclosure. For example, we store the personal data you provide on computer systems that have limited access and are in controlled facilities. When we transmit highly confidential data electronically, we protect it through the use of encryption.

We train our employees who handle personal information to ensure confidentiality of personal data and privacy rights of individuals are respected at all times.

**Retention period or criteria used to determine the retention period.**

Hantec Markets retain personal data for as long as necessary to provide you or the institution you represent with the products and services, and/or for other essential purposes for which data was collected, depending on the legal basis for which that data was obtained and whether we are under any additional legal or regulatory obligations to retain your personal information. Because these needs can vary for different data types in the context of different legal and regulatory requirements, actual retention periods can vary.

If you have opted out of receiving any marketing communications from us, we will add you to a “do not contact” list to ensure we comply with your opt-out right and that your details will not be put back on the marketing list in later stages.

**Data subject rights**

You have the following rights, in certain circumstances, in relation to your personal information:

- Right to be informed about the data processing activities undertaken by us. This information is provided in this Privacy Notice.
- Right to access your personal information.
- Right to rectify your personal information.
- Right to request that your personal information is erased. Subject to any retention limits, we are required to comply with in accordance with applicable laws and regulations.
- Right to restrict the use of your personal information.
- Right to data portability (In certain specific circumstances).
- Right to object to the processing of your personal information.

You can always choose whether you wish to receive promotional e-mails or telephone calls from Hantec Markets. You can also opt-out of (or unsubscribe from) receiving marketing emails at any time by clicking on the unsubscribe link at the bottom of the latest email you received from us.

**The right to lodge a complaint**

If you have concerns or complaints about any aspects of our privacy practices, you can contact us by email at [info@hmarkets.com](mailto:info@hmarkets.com), and this will be investigated promptly by us.