



Data Privacy Notice

HPC / OTCEX

HPC / OTCEX may collect Client's personal data. This privacy notice intends to show our Clients how their personal data is processed, for what purposes this will be done and what rights the Client has in relation to the personal data that will be collected and used. Personal data is at all times processed in order for HPC / OTCEX to fulfil its legal obligations.

Personal data

HPC / OTCEX complies with its GDPR obligations and ensures that personal data shall be processed lawfully and in a transparent manner in relation to its business with the Client; that the personal data shall be collected and processed for the purposes stated; that the personal data shall be accurate and at all times kept up to date; that the personal data shall be kept for no longer than is necessary for the purposes for which it is collected; that the personal data shall be adequately securitised and be protected against loss, unauthorised access or processing, and destruction or damage.

Client's personal data will be treated as strictly confidential, and will be shared only with HPC / OTCEX's Compliance Department. The Client's personal data will only be shared with third parties if consent to do so has been given.

Where personal data has not been obtained directly from the Client, HPC / OTCEX shall provide the Client with the source from which certain personal data originates, and if applicable whether it came from publicly accessible sources.

As part of the business relationship, HPC / OTCEX may process personal data in relation to the Client's employees and shareholders which are provided to HPC / OTCEX by the Client. Such personal data will not have been directly obtained by HPC / OTCEX from the relevant Data Subject as HPC / OTCEX does not have a direct relationship with the relevant Data Subjects. In this context, HPC / OTCEX will solely rely on the Client to provide details to relevant Data Subjects, in accordance with applicable law and regulation, of the categories of the Personal Data that are transferred to and processed by HPC / OTCEX, the purpose (s) for which they are processed and the content of HPC / OTCEX's privacy notice.

Data retention

For audit trail purposes, HPC / OTCEX shall hold personal data for a period of at least five years in order for them to comply with their record keeping obligations under the relevant Data protection and Data Conservation Regulations.

At the end of that period, HPC / OTCEX will be required to delete all personal data relating to the Client, unless a legal requirement requires them to keep the data for a prolonged period of time, or the Client has expressly consented to their data being held for an extended period of time.

The Client's personal data rights

The Client will have the following rights with respect to their personal data:

- The right to access personal data,
- The right to request that personal data regarding them is corrected if it is found to be inaccurate,
- The right to request that their personal data is erased where it is no longer necessary,
- The right to withdraw consent to processing at any time, where relevant,
- The right to restrict processing where there is a dispute in relation to the accuracy or processing of the personal data,



- The right to request that HPC / OTCEX provide the Client with their personal data and where possible, transmit that data to another data controller. This applies only where the processing is based on consent or is necessary for the performance of a contract with the Client and in either case the data controller processes the data by automated means;
- The right to object to the processing of personal data, which only applies where processing is based on legitimate interest,
- The right not to be subject to a decision which is based solely on automated processing, including profiling which produces legal effects concerning them or similarly significant affects them.

The type of data collected and purpose for collection

The type of data we collect along with the purpose for collection is listed below:

Personal data type:	Purpose:
Personal information such as gender, name, date of birth and address	To meet our anti money laundering (AML) and other regulatory obligations in relation to Know Your Client (KYC) and client due diligence. To verify your identity using our verification processes.
Contact information (email address and phone number)	In order to send you correspondence in relation to the services provided and to fulfil our regulatory and compliance obligations
Employment information, financial information, relevant education and trading experience	In order to comply with KYC obligations and in order to meet our regulatory obligations relating to assessing the appropriateness of our products and services
Citizenship and social security numbers or national identity and passport numbers	In order to comply with KYC and regulatory trade reporting and other AML obligations
Proof of photo ID, address verification	In order to comply with KYC and regulatory trade reporting and other AML obligations
Unique device number (IP address) and device information including version of web browser you use	When you visit our website, navigate through the pages or fill in any forms, we may collect your unique device number or IP address in order to set up your profile.
Financial sanctions and credit header information	In order to perform our electronic AML screening checks and to comply with other fraud detection policies. This may generate further information on your credit history, criminal convictions or political interests leading to us making decisions based on the results of these checks



Lawful basis for processing

The following states the lawful bases for processing :

- Processing is necessary for the performance of a contract with the Client or to take steps to enter into a contract to conduct regulated activities;
- Processing is necessary for compliance with a legal obligation.

Contact Details

In order to exercise all right, queries and complaints please contact HPC / OTCEX's Compliance Department.

