

## OSL Digital Securities Limited Privacy Policy

**Effective Date: November 2020 (Version 1.0)**

This explains how we comply with applicable data protection regulations, including the Hong Kong Personal Data (Privacy) Ordinance (Cap. 486) and the EU General Data Protection Regulation (as amended from time to time) showing the reasons and purposes for which we collect personal data and the ways we access your personal data records. Capitalised terms used in this Privacy Policy shall have the meanings given to them in the OSL Digital Securities Limited [Client Terms and Conditions](#).

### **What information do we collect?**

We collect information from you when you register on our Website, accept our Client Terms and Conditions, use our Services, subscribe to our newsletter or fill out a form. When using our services or registering on our Website, as appropriate, you may be asked to enter your name, e-mail address, mailing address or phone number. You may, however, visit our Website anonymously.

### **What do we use your information for?**

We collect your information to enable us to provide the requested Services to you and for improving service, customer support, and browsing experiences for our Website visitors. We will indicate clearly on relevant forms and applications as to whether the information is mandatory or voluntary. Should the information be mandatory, you must submit valid personal information in order to complete the application for the relevant Services. Without such information, we will not be able to undertake the relevant Services.

Any of the information we collect from you may be used in one of the following ways:

- To provide our Services (your information, whether public or private, will not be sold, exchanged, transferred, or given to any other company for any reason whatsoever, without your consent, other than for the express purpose of delivering the purchased product or service requested);
- To personalize your experience (your information helps us to better respond to your individual needs);
- To improve our Website (we continually strive to improve our Website based on the information and feedback we receive from you);
- To improve customer service (your information helps us to more effectively respond to your customer service requests and support needs);
- To send periodic emails (the email address you provide for order processing may be used to send you information and updates pertaining to your Account, in addition to receiving occasional company news, updates, or product or service information related or tangential to the services we have historically offered);
- To meet regulatory and/or compliance obligations (we are required to verify your identity and obtain additional information when your Account transacts in fiat currencies).

### **Security of Personal Data**

We implement a variety of security measures to maintain the safety of your personal information when you place an order or enter, submit, or access your personal information. We offer the use of a secure server. All supplied sensitive information is transmitted via Secure Socket Layer (SSL) technology and then encrypted into our database to be accessed only by those authorized with special access rights to our systems who are required to keep the information confidential.

More generally, we will develop, implement and maintain safeguards appropriate to our size, scope and business, our available resources, the amount of personal data that we hold and identified risks

(including use of encryption where applicable). We will regularly evaluate and test the effectiveness of those safeguards to ensure security of our processing of personal data.

### **Do we use cookies?**

Yes. Cookies are small files that a site or its service provider transfers to your computer's hard drive through your web browser (if you allow) that enables the site or systems of the service provider to recognize your browser and capture and remember certain information. We use cookies to improve our Website by tracking your visits to our Website and recognising your web browser when you are a repeat visitor so that we can gather statistics on new and repeat visitors as well as to process transactions conducted and services delivered through the Website.

### **How to disable cookies?**

Most web browsers are initially set up to accept cookies. You can choose not to accept cookies by changing the setting on your web browser but if you block all cookies, including strictly necessary cookies, you may find certain features on our Website will not work properly.

You can choose not to accept third party cookies through your browser setting. Or opt out of Google's use of cookies by visiting Google's Ad Settings, DoubleClick's use of cookies by visiting the DoubleClick opt-out page and Facebook's use of pixel information on Facebook's Ad settings.

You can also visit the following sites to check and select your preferences for online ads:

- Digital Advertising Alliance
- Network Advertising Initiative Internet
- Advertising Industry

### **Do we disclose any information to outside parties?**

We do not sell, trade, or otherwise transfer to outside parties your personally identifiable information. In order to deliver requested services to you, we may transfer your personal data to sub-contractors ("**Sub-processors**") who assist with operations, settlements and other back-office processing which require them to access data including details of transactions, email addresses and physical addresses (for matching bank payments on occasion). Individual and corporate Know Your Client (KYC) processes may also be undertaken by Sub-processors including performing identification checking and validation of individual or corporate documents, KYC/KYB checks on applicants and related parties such as directors and beneficial owners, and various other checks to ensure the integrity of our systems, transactions and processes and regulatory compliance. Trusted third parties who operate our Website may also receive elements of personal data as Sub-processors.

All our Sub-processors are bound by contract to uphold standards of privacy, confidentiality and security in accordance with this Privacy Policy. Sub-processors may process your data outside Hong Kong, and outside the EU. As we are an Asia-based service provider, customers based in the EU accept that to fulfil our services we will transfer your personal data outside the EU, and explicitly consent to such transfer in accordance with this Privacy Policy. We may also release your information when we believe release is appropriate to comply with the law, enforce our Website policies, or protect our or others' rights, property, or safety. However, non-personally identifiable visitor or customer information may be provided to other parties for marketing, advertising, or other uses.

### **Third party links**

Occasionally, at our discretion, we may include or offer third party products or services on our Website. These third party sites have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites. Nonetheless, we seek to protect the integrity of our Website and welcome any feedback about these sites.

### **Online Privacy Policy**

This online Privacy Policy applies to all personal data we collect from sources outside OSL Digital Securities Limited, both online and offline (except data relating to our employees).

### **Your Consent**

By using our Website, you consent to our Privacy Policy.

### **Our legitimate interests in processing your personal data**

In deciding what data we collect, and what uses we make of that data, we have carefully balanced your interests, as a customer or potential customer providing personal data to us, and your reasonable expectations, with the needs of our business.

We have a legitimate interest in using your data, in addition to providing the service you have engaged us to deliver or registered your interest in us delivering, for the purposes of fraud prevention, intra-group transfers, IT security, direct marketing of our related services, and disclosing information about possible criminal acts or security threats to the authorities.

### **Your right to object**

You may at any time require us to stop using your personal data for direct marketing, by contacting us at any of the contact points below.

If you wish us to stop using your personal data for a purpose other than direct marketing, we will stop unless our legitimate interests prevail. In such circumstances, it is possible that we will be unable to fulfil the Services you have contracted us to provide and you may remain liable for charges for the Services foregone.

### **Changes to our Privacy Policy**

If we decide to change our Privacy Policy, we will post those changes on this page.

### **Disposal of Personal Data**

We shall not retain your personal data in a form which permits the identification of the data subject for longer than needed for the legitimate purpose or purposes for which we originally collected it, including for the purpose of satisfying any legal, accounting or reporting requirements. We are required to store data for a minimum period as required by applicable laws. We shall securely delete or destroy data retained at the end of such period, and require our Sub-processors to do likewise.

### **Data Access and Amendment Requests**

Relevant privacy laws and regulations permit you to request us to provide you with access to the personal data we hold in relation to you (if any), and to amend such data if it contains errors. We shall honour such requests, although we reserve the right to charge a reasonable fee, as allowed by applicable laws.

If you have any inquiries regarding the access and amendment of information, or other query regarding our information policies and practice, please contact: [support.ds@osl.com](mailto:support.ds@osl.com).