

This Privacy Policy and Cookie Disclosure describes how Acetop Global Markets Limited ('Acetop' or 'the Firm') collects and uses information through its website www.Acetop.com and any other related sites and applications. This Privacy Policy and Cookie Disclosure does not apply to websites operated by other organisations and other third parties.

At Acetop we understand the importance of your privacy and take data security very seriously. We want you to feel comfortable opening a trading account with us, and it is our duty to respect each the confidentiality your information and the privacy over your details. Acetop will only collect and use your information where we have lawful grounds and legitimate business reasons to do so.

Acetop is registered with the Registrar General's Department of The Bahamas under Registration Number: 201178B; therefore, any clients' personal data is kept by Acetop according to the laws and regulations of The Bahamas.

This notice, in accordance with the principles of the Data Protection (Privacy and Personal Information) Act 2003, provides indication on how we use your personal information, how we ensure we protect your personal data at all times and how we ensure it remains confidential, whilst assuring we always respect your privacy.

What personal data do we collect from you?

Whether you are an actual client or potential client of ours, you may provide us with information in several ways by using website, account opening applications, webinar sign-up, subscribing to newsletters/updates or by corresponding with us either electronically, by phone or via email. This may consist of information you provide when registering to use our website, subscribing to any of the services and products we offer or if you report a problem with the website. We may also collect this information from external resources.

The information we collect, but is not limited to, is:

- Name, Address, Phone number and email address;
- Gender and date of birth;
- Passport and Tax Identification number;
- Financial information (in order to comply with our regulatory demands) such as annual income, wealth, available risk capital as well as information about your assets and liabilities, trading statements, tax and financial statements, and account balances;
- Employment and income information;
- Technical information such as the IP address, login information, browser type and version, time zone setting, operating system and platform, browser plug-in types;
- Any other similar information.

When you are a client of ours we keep records of your trading activity, comprising of:

- The products you traded and how they performed
- The interest or inclination to trading particular types of products
- The amount you invested in your accounts, and a history of the trades made.

Use of Cookies

A cookie is a small text file that is stored on a user's computer for record-keeping purposes. Acetop uses cookies on its site(s).

Acetop uses both session ID cookies and persistent cookies. A session ID cookie does not expire when you close your browser. A persistent cookie remains on your hard drive for an extended period of time. You can remove persistent cookies by following directions provided in your Internet browser's 'Help' file.

Acetop sets a persistent cookie for statistical purposes. Persistent cookies also enable the Firm to track and target the location and the interests of users that access the Acetop site(s) and to enhance the experience of services offered.

If you reject cookies, you may still use the Acetop sites, but you may not be able to use the online account opening website to submit your application form.

Some of the Acetop business partners use cookies on the Firm's sites; Acetop has no access or control over these cookies.

What we use of your personal data for?

We use information held about you in the following ways:

- To evaluate whether the services we offer are appropriate for you use and your eligibility;
- To verify your identity and background before we conduct business with you;
- To create your account and provide you with the services and products we offer, and you request from us;
- To ensure we comply with our regulatory obligations;
- To handle any complaints or queries we receive from you;
- To notify you about changes to our services and products;
- To improve our website and services;
- To provide you with information about the services we offer that may correspond with those you have already enquired about or may be of interest to you.

Who may we disclose personal information to?

We will endeavour to maintain your information in accordance with our internal policies governing the use and disclosure of confidential information and will only use it for the stated purpose. We will not share this information with any third party outside of Acetop, other than with the relevant Service Providers to enable them to assist in providing, maintaining and operating the Trading Services, unless we have your prior permission to do so or are required to do so by law. We do not sell, warrant, license or else provide your personal data to any third parties for any marketing purpose. However, we may share your information with:

- Any Regulatory, governmental or law enforcement bodies as required by law;
- Any member of our group (such as, but not limited to, our subsidiaries, our ultimate company and its subsidiaries, and successors in title to our business);
- Other parties such as professional advisors like our solicitors in the case of any compulsory legal proceedings, or in order to ascertain, exercise or defend our legal

rights, our auditors and accountants so as to adhere to our regulatory and financial reporting obligations;

- Any introducing brokers or affiliates whom we have a mutual relationship with;
- Any service providers for or behalf of us like our insurers, agents, subcontractors or suppliers such as companies that assist us with data or help verify your identity (These providers serve the sole purpose of using your information for the purpose other than to use your information for the services they provide to us);
- Anybody authorised by you.

Any personal information you provide to us through this website will be dealt with in accordance with our Privacy Policy, the Terms and Conditions of use of this website and any signed authority form that you give to us.

Security of your information

Protecting the confidentiality of your personal information is of paramount importance to us here at Acetop. We have in place both technical and organisational measures to guarantee your information is kept safe and secure. Our staff are trained to ensure client information is respected and handled appropriately, ensure the data of the client is confidential and the privacy of client is maintained. Any breaches of your privacy will be taken treated severely and will result in penalties, including dismissal and termination of contract where necessary.

What are your rights?

Your rights and access to information

You are not obliged to submit the requested personal information to us, however failure to reveal your personal information if we request it, may consequence in being unable to offer you with the products or services we offer.

The website may often contain links from and to other websites of either our partners, affiliates or advertisers, if you decided to click and follow the link, please be aware these websites have their own privacy policies, and we are not held accountable for these policies. Please always verify these polices before any personal information is submitted to these sites.

The Data Protection (Privacy and Personal Information) Act 2003 provides you the right to access the information we hold about you. You have the right to request assess that information free of charge, we will endeavour to process your request within forty (40) days.

Your right to rectify

We ask that you promptly notify us of any changes to your personal information that Acetop holds about you. This ensures that your personal information is up to date and enables us to keep you informed of any updates or changes related to your account.

If any of the personal information we hold about you is inaccurate or incomplete, you are entitled to have it rectified. Please contact us.

We will endeavour to process your request within forty (40) days.

Your right to erasure

You have the right to ask us to delete, remove, or stop using your personal information if there is no need for us to keep it.

There may be legal or other official reasons why we need to keep or use your data. But please tell us if you think that we should not be using it.

We will endeavour to process your request within forty (40) days.

Your right to object your data being used for direct marketing purpose

Acetop may contact you from time to time regarding our products and services, if you no longer wish to receive such communications, you have the right to opt-out at any time. Please get in touch with our customer services team at cs@acetop.com.

Changes to our Privacy Policy

Please note we regularly review our privacy policy and any changes made in the future will be posted on this page, and were we deemed appropriate, notify you on the change via email. Changes are effective once they are posted on our website, and if you continue to use our services, you consent that you agree and acknowledge those changes. We recommend to frequently check for any updates or changes to our privacy policy.

Legal Disclaimer

Acetop reserves the right to disclose your personally identifiable information as required by rules and regulations and when the Firm believes that disclosure is necessary to protect our rights and/or to comply with any judicial and/or other proceedings, court order, legal process served or pursuant to governmental, intergovernmental and/or other regulatory bodies. Acetop shall not be liable for misuse or loss of personal information and/or otherwise on the Firm's sites that Acetop does not have access to or control over. Acetop will not be liable for unlawful or unauthorised use of your personal information due to misuse or misplacement of your passwords, negligent or malicious intervention and/or otherwise.

Enquiries

If you have any enquiries regarding the 'Privacy Policy', please e-mail cs@acetop.com or call.

Declaration

The Chinese version shall always prevail in case of any discrepancy or inconsistency between the Chinese and English version.