Privacy Policy

隐私政策

Product description: Precious Metal, FX, Crude Oil & Index

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1. Introduction

1.1. **HUA AN TAI CHANG GLOBAL LIMITED** (hereinafter referred to as the 'Company'), is incorporated under the laws of The Autonomous Island of Anjouan, Union of Comoros with Registration number 15979 having its registered office at Hamchako, Mutsamudu, Autonomous Island of Anjouan Union of Comoros. The Company is holding The International Brokerage and Clearing House License and authorized to conduct all type of brokerage activities in accordance with the Government Notice No. 005 of 2005 (herein the "Law") regulated by the Anjouan Offshore Finance Authority.

1.2. This privacy statement covers the website www.hatcgroup.com and all its related sub- domains and mobile applications that are registered and operated by Hua An Tai Chang Global Limited.

1.3. The objects and purposes of the Company is to offer different brokerage services for non-residents of the Autonomous republic of Anjouan; to carry on all or any of the business of the company and, without prejudice to the generality of the foregoing, to carry on, in conjunction with each other or as separate and distinct undertakings, all or any of the following businesses:

- providing direct consultations to investors on investments to clients, including issues concerning the price of securities, investment in securities, buying and selling of securities, as well as related foreign exchange transactions.
- consulting on securities issuance and money arising services.
- arranging and carrying out the distribution of the issuer's securities on a nonguaranteed basis.
- receiving and transmitting clients' orders in connection with securities, effecting transactions in securities for clients' accounts, with clients' funds.
- managing clients' investment portfolios and funds allocated for operations in securities.
- holding clients' investment funds and/or securities, providing safekeeping, custody and nominee services for securities.
- effecting transactions in securities for their own account with their own funds (proprietary trading).
- arranging and carrying out the distribution of the issuer's securities on a guaranteed basis.
- loaning securities to and borrowing securities from clients as well as using their own funds for the acquisition of securities for clients, engaging in short selling as defined in NBG regulations.
- Company services.
- Issuing of own deposit products.
- To provide loans and borrow funds (loan transactions).

- To carry out currency and exchange transactions.
- To hold assets, capital, precision metals, bonds, shares or another financial instrument for third parties.
- To accept cash deposits of any type (depositary transactions).
- Current Account to Corporate and Individual clients
- Fixed term deposit accounts.
- issuing Bank References and Certificates of Good Standing.
- To issue securities and credit cards processing.
- To provide guarantees of any type (guarantee business).
- Multi-Currency Accounts.
- Asset Management like products.
- Investment Consultancy Services.
- Financial Engineering (Private Banking and Wealth Management in combined product solutions)
- To act as intermediary in securities trading.
- To provide other permitted financial services.
- Forex trading.
- Forex Currency Exchange Operator (utility token and security token) CFD contract for difference.

1.4. The Company in accordance with the provisions of the Law, outlines in the Privacy Policy (herein the "Policy") how the Company collects, maintains, uses and discloses personal information of the Client.

1.5. This Policy applies to Hua An Tai Chang Global Limited which shall follow the principles as outlined herein.

1.6. This Policy applies to existing clients, prospective clients, clients who have terminated their contractual relationship with the Company and website visitors (hereinafter jointly referred to as the "Clients" or "you") who are accessing or using the Company's website(s) and mobile applications (hereinafter referred to as the "Platforms").

1.7. The Company is committed to protecting the privacy of all Clients 'Personal Data which it processes in accordance with the provisions of this Policy and the Company's Terms of Business.

1.8. For the purposes of this Policy, references to "Personal Data" shall mean data which identifies or may identify Clients and which may include, for example, a Client's name, address, identification number, telephone number and date of birth.

2. Collection of Personal Data

2.1. The Company collects different types of Personal Data through the Company's Platforms from Clients who visit such Platforms or access, use or request products and services offered by the Company.

2.2. The provision of certain Personal Data is required for establishing a contractual relationship with the Company. Clients not wishing to provide such Personal Data will not be able to open an account with the Company or be provided with other products and/or services of the Company.

2.3. Clients have a responsibility to ensure that the Personal Data they provide to the Company and recorded in their personal account remain accurate and up to date throughout the period of their contractual relationship with the Company.

2.4. In addition to the information provided by Clients, the Company also lawfully collects and processes Personal Data from publicly available sources (including, inter alia, the press, social media and the internet) and third-party risk management software solutions in order to meet its regulatory obligations and for confirming the validity of the provided information.

2.5. The Personal Data received from the Client, collected and processed by the Company are required for the communication, identification, verification and assessment for the business relationship establishment with the Client, contract performance and legal compliance. The following Personal Data may be collected from Clients depending on the product and/or service the Company provides to him:

(a) Contact details such as the Client's name, e-mail address and phone number.

(b) Identification details such as the Client's identification or passport number.

(c) Biographical and demographic data such as gender, age, ethnicity, education, occupation, the Client's financial trading experience and whether he has a prominent public function status (PEP).

(d) Financial information such as the Client's income status, bank account number and account details, tax information and other financial information.

(e) Information relevant to the services that the Company provides to the Client such as the Client's transactions and communication records with the Company.

(f) Details of visitors' and Clients' visits to the Company's website and information collected through cookies and other tracking technologies including IP address and domain name, browser version, operating system and geolocation.

(g) Information in relation to criminal convictions and offences to the extent required and/or permitted by applicable law.

(h) Your marketing preferences.

3. No Children's Data Collection

The Company understands the importance of protecting children's privacy. The Company's services are not intended for children under eighteen (18) years of age nor is the Company's website designed for use by children. Therefore, the Company does not knowingly or specifically collect children's personal data. If the Company collects such data mistakenly or unintentionally, the Company shall delete the information at the earliest possible once it obtains knowledge thereof. If the Client becomes aware of such data collection he/she shall notify the Company at info@hatcgroup.com

4. Use of Personal Data

4.1. The Company collects and processes Personal Data which are required for the evaluation, establishment and maintenance of the contractual relationship between the Company and the Client and in order to comply with the Policy and applicable laws and regulations governing the provision of financial services. In some cases, the Company may also process the Client's Personal Data to pursue its legitimate interests or those of third parties, provided that the Clients' interests and fundamental rights are not overridden by those of the Company or the third party.

4.2. Specifically, the Client's Personal Data will most commonly be used in the following circumstances:

(a) Where the Company needs to perform the contract it has entered with the Client or in order to take certain steps prior to entering into a contract with the Client

Processing is necessary for the Company in order to provide the Client with its products and services, and more specifically in order:

- To verify the Client's identity and carry out any required credit checks;
- To ensure that the Client meets the suitability requirements to use the Company's products and services;
- To manage the account the Client holds with the Company;
- To process the Client's transactions; and
- To send to the Client any information about transactions/post-transactions services.

If the Client does not provide the requested Personal Data, the Company may be unable to offer the Client with its products and/or services.

(b) Where the Company needs to comply with a legal obligation

As an investment firm, the Company is required to comply with certain legal and

regulatory obligations which may involve the processing of Personal Data. Such obligations and requirements impose on the Company necessary data processing activities for identify verifications, compliance with court orders, tax law or other reporting obligations and anti-money laundering controls.

(c) Where the Company has legitimate interests to use the Client's Personal Data

More specifically, the Company may process the Personal Data for the following purposes:

- To develop or enhance its products and services;
- To enhance the security of the Company's network and information systems;
- To identify, prevent and investigate fraud and other unlawful activities, unauthorised transactions and other liabilities and manage risk exposure;
- To maintain its accounts and records;
- To manage its business operations and comply with internal policies and procedures;
- To defend, investigate or prosecute legal claims;
- To receive professional advice (such as legal advice), and
- For the analysis of statistical data which helps the Company in providing its Clients with better products and services in the future. It should be noted that the Company anonymises and aggregate such data so that they do not directly or indirectly reveal the Clients' identities. The Company may provide this statistical data to third parties (as described in more detail in Section 8) solely for statistical purposes and in an effort to improve the Company's marketing campaign.

(d) Where the Client has given his consent

The Company will only ask for the Client's consent when the Company wishes to provide marketing information to its Clients in relation to its products or services which may be of interest to the Client.

The Client may withdraw such consent at any time. This right doesn't affect the lawfulness of processing that was based on that consent before its withdrawal.

5. Cookies

5.1. A cookie is a small text file that is stored on a user's computer for record-keeping purposes. The

Company uses cookies on its website(s). The Company does link the information that it stores in cookies to any Personal Data the Client submits while accessing the Company's website(s).

5.2. The Company uses both session ID cookies and persistent cookies. A session ID cookie does not expire when the Client closes his browser. A persistent cookie remains on the Client's hard drive for an extended period of time. The Client can remove persistent cookies by following directions provided in his Internet browser's "help" file.

5.3. The Company sets a persistent cookie for statistical purposes. Persistent cookies also enable the Company to track and target the location and the interests of its users and to enhance the experience of its services on the Company's website(s).

5.4. If the Client rejects cookies, he may still use the Company's website(s), but the Client will not be able to use myHATC area and submit his online application form.

5.5. Some of the Company's business partners use cookies on the Company's website(s). The Company has no access to, or control over these cookies.

5.6. Cookies Analysis

Below we provide the details of the cookies used and the options for further reading and opt out.

(a) Hua An Tai Chang Global Limited Cookies

Hua An Tai Chang Global Limited persistent and session cookies are used to support our visitors and clients browsing experience.

Cookie Category	Purpose
Required	To enable the core functionality for the website and user accessibility.
Functional	To maintain the user's authentication and personalization functions through our websites and client's myHATC area. To serve users with the appropriate content and resources based on their preferences.
Analytical	To track user's visit to our websites, identify their preferences and collect online behavioural data for analysis and optimization.

(b) Third Party Cookies

Cookies by third party providers are used on our websites to enable tools and services to our visitors and clients and support our internal analytical and marketing activities. The Company has no access to, or control over these cookies therefore will not be liable for misuse or loss of Personal Data resulting from cookies on the

Company's website(s) that the Company does not have access to or control over.

5.7. The Client or visitor of the Company's website acknowledges that he can control and manage the above cookies through his web browser security and privacy settings. If you'd like to learn out more about cookies as well as how to manage, and delete them, visit: www.allaboutcookies.org.

6. Links to other websites

6.1. The Company's website contains or may contain links to other websites or social media platforms of interest. However, once you have used these links to leave the Company's website, you should note that the Company does not have any control over those other websites. Therefore, the Company cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this Policy. You should exercise caution and look at the privacy statement applicable to the website in question.

6.2. The Company will not be liable for the unlawful or unauthorized use of the Client's Personal Data due to misuse and/or malicious use and/or negligence and/or misplacement of the Client's passwords either by him/her or any third party.

7. Client Records Retention Periods

Under the applicable laws and regulations, the Company is required to keep records containing Client Personal Data, trading information, account opening documents, communications and anything else which relates to the Client after the execution of each transaction and/or for 5 (five) years of the termination of the business relationship.

8. Sharing and Disclosure of Personal Data

8.1. In the course of the performance of the Company's contractual and statutory obligations, the Client's Personal Data may be disclosed to third parties. Most of such third parties enter into contractual arrangements with the Company by which they observe data protection and confidentiality.

8.2. Under the circumstances referred to above, recipients of Personal Data may be, for example:

(a) third party payment service providers who help the Company provide its Clients the services of securely deposit and withdrawal to and from a Client's account;

(b) other service providers that the Company has chosen to support it in the effective provision of its products and services by offering technological expertise, solutions and support;

(c) governmental and regulatory bodies, including law enforcement authorities and FSB, in connection with enquiries, proceedings or investigations by such parties or in order to enable the Company to comply with its legal and regulatory requirements;

(d) credit reference and fraud prevention agencies, third party authentication service providers and other financial institutions for the purposes of credit checking, fraud prevention and anti-money laundering controls;

(e) third party service providers for the provision of the required customer support services through live chat and the Company's website visits and traffic monitoring through cookies;

(f) external consultants including legal and tax consultants;

(g) data reporting service providers;

(h) market research companies and call centers; and

(i) affiliates of the Company;

8.3. In accordance with the recommendations of Payment Card Industry Security Standards Council, customer card details are protected using Transport Layer encryption — TLS 1.2 and application layer with algorithm AES and key length 256 bit.

8.4. The Company does not collect, store or process any personal credit or debit card information. All payment transactions are processed through payment services providers.

9. Business Transfers Legal Requirements

If the Company is involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of company assets, or transition of service to another provider, Client's Personal Data and other information may be transferred to a successor or affiliate as part of that transaction along with other assets.

10. Marketing Communications – Services Subscriptions Preferences

10.1. The Company may process Personal Data to tell its Clients about products, services and offers that may be of interest to the Client. The Company may only process such Personal Data if it has obtained the Client's explicit consent to do so.

10.2. If the Client no longer wishes to receive any promotional communications, he may opt-out of receiving them by following the instructions included in each communication or by updating his email subscription preferences within the Client account area.

11. Personal Data Rights

Clients have the following rights in relation to their Personal Data:

(a) Right of access: The Client has the right to be informed whether the Company is processing his/her Personal Data, and if so, to provide the Client with a copy of that Personal Data.

(b) Right to rectification: The Client is entitled to request that the Company corrects or completes his/her Personal Data if it is inaccurate or incomplete.

(c) Right to erasure: This enables the Client to ask the Company to erase or remove the Client's Personal Data under certain circumstances, such as when the Client withdraws his consent.

(d) Right to restrict processing: This enables the Client to ask the Company to restrict the processing of the Client's Personal Data if:

- it is not accurate;
- it has been used unlawfully but the Client doesn't want it to be deleted;
- it is not relevant any more, but the Client wants the Company to keep it for use in possible legal claims;
- the Client has already asked the Company to stop using his Personal Data but he is waiting for the Company to confirm if it has legitimate grounds to use such Personal Data.

(e) Right to data portability: The Client has the right to obtain his/her Personal Data provided to the Company in a structured, commonly used and machine-readable format.

(f) Right to object: The Client may ask the Company at any time to stop processing his/her Personal Data, and the Company will do so:

- If the Company is relying on a legitimate interest to process the Client's Personal Data and the Company cannot demonstrate compelling legitimate grounds for the processing, or
- If the Company is processing Client's Personal Data for direct marketing.

(g) Rights in relation to automated decision-making and profiling: The Client has the right to be free from decisions based solely on automated processing of his/her Personal Data, including profiling, that affect him/her, unless such profiling is necessary for entering into, or the performance of, a contract between Client and the Company or the Client provides explicit consent.

(h) Right to withdraw consent: If the Company relies on the Client's consent to process his/her Personal Data, the Client has the right to withdraw that consent at any time. This will not affect the lawfulness of the processing that took place on the basis of the Client's prior consent.

(i) Right to lodge a complaint with the data protection authority: If the Client has a concern about the Company's privacy practices, including the way in which the Company handled his/her Personal Data, the Client can report it to the relevant data protection authority.

To exercise any of the above rights, the Client may contact the Company at

info@hatcgroup.com.

12. Automated decision-making and profiling

When you make an application for account opening we will use systems to make an automated assessment of your knowledge and experience through the evaluation of an appropriateness test. Based on the results of such test will then assign the appropriate leverage to your trading account. In such cases, you have the right to contact us to:

(a) give you information about the processing of your personal data (please also see Section 11 of this Policy in relation to your rights); and/or

(b) request that one of our employees examines your application and obtain an explanation for the automated decision reached. You also have the right to challenge such a decision. Following such a request, we will reassess your application, taking into consideration both the reasons that a particular automated decision was reached as well as your own point of view.

13. Confidentiality and Security of Personal Data

13.1. Personal Data which the Company holds is to be treated by the Company as confidential and will not be used for any purpose other than those specified in this Policy.

13.2. Any Personal Data that the Client provides to the Company will be treated as confidential and shared only with the parties set out in Section 8 of this Policy.

13.3. Such Personal Data will not be disclosed to any other third party except if such disclosure is required under any regulatory or legal proceedings.

13.4. The Personal Data that the Client provides in connection with registering as a user of the website(s) or for the Services is classified as Registration Information. The Company offers high protection of the Registration Information provided by the Client. The Client can access his Registration Information through a password selected by him which is encrypted and known only to the Client. The Client must be careful and protect his password from any third parties. Registration Information is safely stored on secure servers that only authorized personnel have access to via password. The Company encrypts all Personal Data as it is transferred to the Company and thus makes all necessary effort to prevent unauthorized parties from viewing any such information.

13.5. Personal Data provided to the Company that is not Registration Information also resides on secure servers and is again accessible only to authorized personnel via password. This information is not accessible by the Client; therefore, no password is provided to view or modify this information.

14. Amendments to this Policy

The Company reserves the right to review and amend this Policy from time to time for any reason and notify the Clients of any such amendments accordingly by posting an updated

version of this Policy on the Company's website(s). The Company will notify you about any material changes to this Policy by placing a notice on its website or by communicating with you directly.

The Client is responsible for regularly reviewing the Policy and any amendments thereof.

15. Enquiries and Contact Details

For any general enquiries regarding this Policy please contact the Company by emailing the Customer Support Department at cs@hatcgroup.com.

For any requests in regard to personal data rights, as set out in Section 11 of this Policy, or questions about how the Company processes Client's Personal Data, please contact us at info@hatcgroup.com.

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引言

HUA AN TAI CHANG GLOBAL LIMITED（以下简称"公司"）依据昂儒昂自治岛法律注册成立，注册号为15979，注册地址为昂儒昂自治岛穆察穆杜市哈姆查科区。公司持有国际经纪与清算牌照，并根据2005年第005号政府公告（以下简称"法律"）获准开展所有类型经纪业务，受昂儒昂离岸金融管理局监管。

本隐私声明适用于公司注册和运营的网站及其相关子域和移动应用程序。

公司的目标和目的是为公众及安茹安自治共和国非居民的企业和私人客户提供不同的经纪服务；并在不影响前述一般性规定的前提下，单独或联合开展以下任何业务：

- 向投资者提供直接投资咨询，包括证券价格、证券投资、买卖证券以及相关外汇交易问题。
- 提供证券发行和资金筹集服务的咨询。
- 在无担保基础上安排和执行发行人的证券分销。
- 接收和传输客户与证券相关的订单，使用客户资金为客户账户执行证券交易。
- 管理客户的投资组合和分配用于证券操作的资金。
- 持有客户的投资资金和/或证券，提供证券的保管、托管和代名人服务。
- 使用公司自身的资金为公司账户执行证券交易（自营交易）。
- 在有担保基础上安排和执行发行人的证券分销。
- 向客户提供证券贷款和借款，并使用公司自身的资金为客户购买证券，参与NBG法规定义的卖空交易。
- 公司服务。
- 发行公司自身的存款产品。
- 提供贷款和借款资金（贷款交易）。
- 开展货币和外汇交易。
- 为第三方持有资产、资本、贵金属、债券、股份或其他金融工具。
- 接受任何类型的现金存款（存款交易）。
- 为企业和个人客户提供活期账户。
- 提供定期存款账户。
- 发行银行参考函和良好信誉证书。
- 发行证券和信用卡处理。
- 提供任何类型的担保（担保业务）。
- 多货币账户。

- 资产管理类产品。
- 投资咨询服务。
- 金融工程（私人银行和财富管理相结合的产品解决方案）。
- 作为证券交易的中间人。
- 提供其他允许的金融服务。
- 外汇交易。
- 外汇货币兑换运营商（实用代币和安全代币）差价合约。
- 作为资本家、金融家、促成者和特许权经营者开展业务，并参与、承担、执行各种金融、商业、工业、贸易、开发、代理和其他操作，并向特许权经营者、发明家、专利持有者和其他人提供或垫付资金，无论是否有担保，目的是改善和发展或协助改善和发展任何特许权、土地或其他，或实验、改善、测试或开发任何发明、设计或工业或其他过程。

根据法律，公司在本隐私政策（以下简称“政策”）中概述了公司如何收集、维护、使用和披露客户的个人信息。
本政策适用于公司，并遵循本文所述的原则。

本政策适用于现有客户、潜在客户、已终止与公司合同关系的客户以及访问或使用公司网站和移动应用程序（以下简称“平台”）的网站访问者（以下简称“客户”或“您”）。

公司致力于保护所有客户处理的个人数据的隐私，并根据本政策和公司的业务条款进行处理。

就本政策而言，“个人数据”是指可识别或可能识别客户的任何数据，例如客户的姓名、地址、身份证号码、电话号码和出生日期。

个人数据的收集

公司通过其平台从访问平台或访问、使用或请求公司提供的产品的客户那里收集不同类型的个人数据。
提供某些个人数据是与公司建立合同关系所必需的。不愿提供此类个人数据的客户将无法在公司开设账户或获得公司的其他产品和/或服务。

客户有责任确保他们提供给公司并记录在其个人账户中的个人数据在整个合同关系期间保持准确和最新。
除了客户提供的信息外，公司还从公开来源（包括但不限于新闻、社交媒体和互联网）以及第三方风险管理软件解决方案中合法收集和处理个人数据，以满足其监管义务并确认所提供信息的有

效性。

从客户处接收、收集和处理由公司所需的个人数据用于沟通、身份验证、评估以建立与客户的业务关系、合同执行和法律合规。具体可能从客户收集的个人数据取决于公司向其提供的产品和/或服务，包括：

- 联系详情，如客户的姓名、电子邮件地址和电话号码。
- 身份详情，如客户的身份证或护照号码。
- 传记和人口统计数据，如性别、年龄、种族、教育、职业、客户的金融交易经验以及他是否具有显赫公共职能身份（PEP）。
- 财务信息，如客户的收入状况、银行账户号码和账户详情、税务信息及其他财务信息。
- 与公司向客户提供的服务相关的信息，如客户的交易和与公司的通信记录。
- 访问公司网站和通过Cookies及其他跟踪技术收集的访问者和客户访问详情，包括IP地址和域名、浏览器版本、操作系统和地理位置。
- 在适用法律要求和/或允许的范围内，与犯罪定罪和犯罪相关的信息。
- 您的营销偏好。

不收集儿童数据

公司了解保护儿童隐私的重要性。公司服务并非针对18岁以下儿童，其网站也不是为儿童设计。因此，公司不会故意或具体收集儿童的个人数据。如果公司错误或无意中收集了此类数据，公司将在知悉后尽早删除该信息。如果客户发现此类数据收集，应通过info@hatcgroup.com通知公司。

个人数据的用途

公司收集和处理个人数据，以评估、建立和维护公司与客户之间的合同关系，并遵守管理金融服务提供政策的适用法律和法规。在某些情况下，公司还可能处理客户的个人数据以追求其自身或第三方的合法利益，前提是客户的利益和基本权利不被公司或第三方的利益所覆盖。

具体而言，客户的个人数据最常在以下情况下使用：

- 公司需要履行其与客户签订的合同，或在签订合同前采取某些步骤。
- 处理对于公司提供产品和服务是必要的，更具体地说：
    - 验证客户的身份并进行任何必要的信用检查；
    - 确保客户符合使用公司产品和服务的适合性要求；
    - 管理客户在公司持有的账户；
    - 处理客户的交易；
    - 向客户发送任何交易/交易后服务的相关信息。

如果客户不提供请求的个人数据，公司可能无法向客户提供其产品和/或服务。

- 公司需要遵守法律义务
  作为投资公司，公司必须遵守某些法律和监管义务，这些可能涉及个人数据的处理。此类义务和要求对公司施加了必要的身份验证、遵守法院命令、税务法或其他报告义务和反洗钱控制的数据处理活动。
- 公司有使用客户个人数据的合法利益
  更具体地说，公司可能为以下目的处理个人数据：
  - 开发或增强其产品和服务；
  - 增强公司网络和信息系统的安全性；
  - 识别、防止和调查欺诈及其他非法活动、未经授权的交易及其他责任，并管理风险敞口；
  - 维护其账户和记录；
  - 管理其业务运营并遵守内部政策和程序；
  - 辩护、调查或起诉法律诉讼；
  - 获得专业建议（如法律建议）；
  - 分析统计数据，帮助公司在未来为客户提供更好的产品和服务。应注意的是，公司会匿名和汇总此类数据，以避免直接或间接揭示客户的身份。公司可能会将此类统计数据仅为统计目的提供给第三方（见第8节更详细描述），以改善公司的营销活动。
- 客户已给予同意
  公司只会在希望向客户提供可能感兴趣的产品或服务的营销信息时请求客户的同意。
  客户可随时撤销此同意。此权利不影响在撤销前基于该同意的处理的合法性。

Cookies

Cookies是存储在用户计算机上的小型文本文件，用于记录目的。公司在其网站上使用Cookies，但不会将存储在Cookies中的信息与客户提交的任何个人数据关联。

公司使用会话ID Cookies和持久Cookies。客户可通过浏览器“帮助”文件删除持久Cookies。如果客户拒绝Cookies，仍然可以使用公司网站，但无法使用myHATC区域或提交在线申请表。

其他网站链接

公司网站可能包含指向其他网站或社交媒体平台的链接。离开公司网站后，公司对这些网站无控制权，因此不对您在这些网站上提供的任何信息的保护和隐私负责。

客户记录保留期

根据适用法律和法规，公司需在每次交易执行后和/或业务关系终止后5年保留包含客户个人数据、交易信息、账户开设文件、通信记录等记录。

个人数据的共享和披露

在履行合同和法定义务过程中，客户的个人数据可能披露给第三方（如支付服务提供商、政府机构、信用参考机构等）。公司确保这些第三方遵守数据保护和保密义务。

业务转移和法律要求

如果公司涉及合并、收购、破产等，客户的个人数据可能作为交易的一部分转移给继任者或关联方。

营销沟通 - 服务订阅偏好

公司可能处理个人数据向客户提供可能感兴趣的产品、服务和优惠，但需获得客户的明确同意。客户可随时选择退出。

个人数据权利

客户对自己的个人数据享有以下权利：

- 访问权：了解公司是否处理其个人数据，并获取副本。
- 更正权：要求更正或完成不准确或不完整的个人数据。
- 删除权：在特定情况下要求删除个人数据。
- 限制处理权：在特定条件下要求限制处理。
- 数据可携权：获取以结构化、常用和机器可读格式提供的个人数据。
- 反对权：反对公司处理其个人数据（例如用于直接营销）。
- 自动决策和建模权：反对仅基于自动处理做出的决策。
- 撤回同意权：随时撤回同意。
- 向数据保护机构投诉权：如对公司隐私做法有疑虑，可向相关数据保护机构报告。

如需行使上述权利，请联系info@hatcgroup.com。

自动决策和建模

开立账户申请时，公司将使用系统自动评估您的知识和经验，并根据适当性测试结果分配适当的杠杆。在这种情况下，您有权联系公司获取更多信息或挑战自动决策。

个人数据的保密性和安全性

公司将持有的个人数据视为机密，仅用于本政策中指定的目的。客户提供的注册信息通过加密密码保护，存储在安全服务器上，仅授权人员可访问。

本政策的修改

公司保留定期审查和修改本政策的权利，并通过在网站上发布更新版本或直接通知客户来告知变更。客户有责任定期查看政策及任何修改。

咨询和联系方式

如对本政策有任何疑问，请通过cs@hatcgroup.com联系客户支持部门。如需行使个人数据权利或有其他问题，请联系info@hatcgroup.com。

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