

Personal Data Collection Statement

1. Security and Disclosure

RRBULL respects everyone's right to privacy. We value our relationship with you, and we take pride in maintaining loyalty and respect with each individual client; all personal information collected by RRBULL is protected under stringent security measures. The provisions of this notice apply to former clients, current clients, and applicants.

2. Personal information

When you apply for and/or maintain a live or demo account with RRBULL or contact RRBULL for any inquiries, RRBULL collects personal information, including your name, contact details and other personal particulars for the following purposes, such as evaluating your financial needs, processing your requests and transactions, informing you about investment products and services and providing service. The types of personal information may include:

- a) Application information. Information you provide to us on applications and other forms, such as your name, address, birth date, identification card number, occupation, assets, and financials.
- b) Transaction information. Information about your transactions as well as information about our communications with you. Examples include your account balances, trading activity, your inquiries, and our responses.
- c) Verification information. Information necessary to verify your identity, such as a passport or driving license. Additional examples also include background information we receive from public records or from other entities not affiliated with RRBULL. RRBULL may also be required to collect your information and take actions necessary to verify your identity in accordance with regulatory requirements.

2.1 RRBULL intends to use your name, telephone number and email address for direct marketing of investment products and services. RRBULL requires your consent for this purpose, and by applying for and/or opening a real or demo account with RRBULL, you acknowledge and agree that your consent is voluntarily provided to RRBULL. If you do not want RRBULL to use your data for direct marketing purposes as described in this Policy Statement, you may exercise your right to optout by notifying RRBULL.

2.1.1 In accordance with the Personal Data (Privacy) Ordinance, RRBULL informs

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you that your personal data may be used for the following purposes:

- a) Sharing, cross-checking and transferring that personal data with any RRBULL's affiliated or associated companies or RRBULL whether in relation to new or existing client verification procedures, ongoing account administration or direct or indirect marketing of any investment, dealing or related services or products;
- b) The comparison and or transfer to third party service providers of such personal data for the purposes of credit checking and or data verification;
- c) Any purpose relating to or in connection with the compliance of any law, regulation, court order or order of a regulatory authority, including the provision of any such data to any such regulatory authority as required by law or regulation;
- d) Any other purpose relating to or in connection with RRBULL's business or dealings or the business or dealing of RRBULL's affiliated or associated company or any member of RRBULL

2.2 Personal data about you held by RRBULL will be kept confidential, RRBULL's affiliated or associated company may provide information to:

- a) any agent or third party services provider who provides services to any of RRBULL's affiliated or associated companies or RRBULL in connection with the operation of its business;
- b) any regulatory or governmental authorities which relates to or govern any business of any of RRBULL's affiliated or associated companies or RRBULL;
- c) any person that RRBULL considers as appropriate or fit including any of RRBULL's affiliated or associated companies or a member of RRBULL and its employees under a duty of confidentiality. Such information may be transferred to a place outside Hong Kong where it may not have protection to the same or similar level in Hong Kong;

2.3 In accordance with the terms of the Personal Data (Privacy) Ordinance, any client has the right:

- a) To determine whether RRBULL holds data about that client and of access to

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such data;

- b) To request RRBULL correct any inaccurate data relating to the client;
- c) To ascertain RRBULL's policies and practices in relation to data and be informed of the kind of personal data held by any of RRBULL's affiliated or associated companies or RRBULL;
- d) To request RRBULL or its affiliated or associated companies or RRBULL to cease from using his/her personal data for direct or indirect marketing purpose by writing

NOTE: RRBULL reserves the right to charge a reasonable fee for processing requests for access to data under the terms of the Personal Data (Privacy) Ordinance. For requests to obtain or correct information or to obtain information on the privacy protection policies and practices of RRBULL, please refer to the following contact details: 1204A, 12/F., Tower One Admiralty Centre, No. 18 Harcourt Road, Admiralty, Hong Kong; Hong Kong Tel: +852-3158-0123.

You are not required to supply any of the personal information that we may request. However, failure to provide all required information may prevent us from opening and/or maintaining your account or providing services to you. While we make every effort to ensure that all information, we hold about you is accurate, complete, and up to date, you can help us considerably in this regard by promptly notifying us if there are any changes to your personal information.

3. About Cookies

Cookies are small files containing information that a Web site uses to track its visitors. RRBULL may set and access RRBULL cookies on your computer, enabling us to learn which advertisements and promotions bring users to our website. RRBULL or any of its divisions or RRBULL may use cookies in connection with RRBULL's products and services to track your activities on our Web sites. Such information that we collect, and share would be anonymous and not personally identifiable.

4. Security technology

RRBULL uses Secure Socket Layer (SSL) encryption technology in order to protect certain information that you submit. This type of technology protects you from having your information intercepted by anyone other than RRBULL while it is being transmitted to us. We work hard to ensure that our Web sites are secure and that they meet industry standards. RRBULL also uses other safeguards such as firewalls, authentication systems (e.g., passwords and personal identification numbers), and access control mechanisms to control unauthorized access to systems and data.

5. Share data with our affiliates

RRBULL may share personal information described above with our affiliates for business purposes, such as, but not limited to, servicing clients' accounts and informing clients about new investment products and services, or to aid in the trading activity of the company, its affiliates, or employees, and as permitted by applicable law. Our affiliates may include companies controlled or owned by us as well as companies that have an ownership interest in our company. The information we share with affiliates or RRBULL may include any of the information described above, such as your name, address, transaction and account information. Our affiliates or RRBULL maintain the privacy of your information to the same extent RRBULL does in accordance with this Policy. If you do not wish to have your personal information disclosed to our affiliates or other third parties as described in this Policy, please send your request to: 1204A, 12/F., Tower One Admiralty Centre, No. 18 Harcourt Road, Admiralty, Hong Kong.

6. Sharing information with third parties

RRBULL does not disclose your personal information to third parties, except as described in this Policy. Third party disclosures may include sharing such information with non-affiliated companies that perform support services for your account or facilitate your transactions with RRBULL, including RRBULL and those that provide professional, legal, or accounting advice to RRBULL. Non-affiliated companies that assist RRBULL in providing services to you are required to maintain the confidentiality of such information to the extent they receive it and to use your personal information only while providing such

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services and only for the purposes that RRBULL describes in this policy. We may also disclose your personal information to third parties to fulfill your instructions or pursuant to your expressed consent. We want you to know that RRBULL will not sell your personal information.

7. Regulatory disclosure

Under limited circumstances, RRBULL may disclose your personal information to third parties as permitted by, or to comply with, applicable laws and regulations. For example, we may disclose personal information to cooperate with regulatory authorities and law enforcement agencies to comply with subpoenas or other official requests, and as necessary to protect our rights or property. Except as described in this privacy policy, we will not use your personal information for any other purpose, unless we describe how such information will be used at the time you disclose it to us or we obtain your permission.