

# Privacy Policy Statement ("Statement")

## Privacy Policy

1. In this Statement, the following terms shall have their respective meanings:

**"PANTHERTRADE"**, or "we" or "us" means Panthertrade (Hong Kong) Limited;

**"Group"** means PANTHERTRADE and its subsidiaries, holding companies, subsidiaries of those holding companies and other associated or related entities;

**"PDPO"** means the Personal Data (Privacy) Ordinance (Cap. 486 of the laws of Hong Kong);

**"Hong Kong"** means the Hong Kong Special Administrative Region of the People's Republic of China;

**"KYC"** means know your customer requirements under the AML/CTF Ordinance;

**"Platform"** means any application, software, electronic portal or system operated by PANTHERTRADE that provides access to the PANTHERTRADE online trading system and the Virtual Asset Services.

**"personal data"** means any data:

- (a) relating directly or indirectly to a living individual;
- (b) from which it is practicable for the identity of the individual to be directly or indirectly ascertained; and
- (c) in a form in which access to or processing of the data is practicable;

**"non-personal data"** means any data not falling within the meaning of "personal data";

**"Virtual Asset Services"** means the services operated by PANTHERTRADE on the Platform, provided under this Statement and transacted in accordance with the policy and procedures of PANTHERTRADE.

2. PANTHERTRADE is committed to providing its clients with excellent Virtual Asset Services. Based on your service needs, we will collect and use different types of your personal data and non-personal data. We treat the use and confidentiality of our clients' personal data and non-personal data seriously.
3. The security and privacy of our clients' personal data and non-personal data is a matter of utmost importance for PANTHERTRADE. We are committed to protecting the privacy, confidentiality, and security of our clients' personal data and non-personal data; in the case of personal data by complying with the requirements of the PDPO through the implementation of the policies set out in this Statement.
4. Where our operations are also subject to privacy legislation other than that of Hong Kong, we will seek to comply with all such applicable laws and regulations to the extent that it is possible for us to do so. Where there is a conflict between different systems of laws, we will, in most

cases, comply with the system of law that imposes a stricter standard on us.

5. PANTHERTRADE reserves the right from time to time to revise this Statement. Where any changes to this Statement are material, PANTHERTRADE will notify you using the contact details which you have provided PANTHERTRADE or by updating and issuing the new version on our website and/or the Platform. You are advised to check this Statement periodically and pay attention to its revision. After the publication of the new version of this Statement, your continued use of our website and/or the Platform or your continued relationship with PANTHERTRADE shall be deemed to be acceptance of and consent to this updated Statement, as amended from time to time.

### **Collection and Use of Data**

6. PANTHERTRADE may collect personal data provided voluntarily by clients and visitors to our website and/or the Platform either directly or through a third party platform, when you apply, subscribe and register for our products and services, click on advertisements we place on relevant third party platforms, participate in our operation activities or contact us for any requests or consultations.
7. Individual clients and/or visitors (which includes you) may be required to provide us with, including but not limited to the following data:
  - (a) their personal data, including name, age, gender, occupation, marital status, date of birth, email address, telephone number, personal identity information, biometric data such as facial biometric data for automated biometric verification and identification, photograph and video, electronic signature, address, proof of address (e.g. utility bill) and other contact information, location data such as country and region, government identification (residence permit, passport, driver license, national identity card, etc), financial information, personal credit information (payment history, credit information and debt information, etc.), source of wealth, annual income, deposit plan, risk tolerance, investment experiences and objectives, judicial and litigation-related information, compliance assessment and risk assessment information from third parties;
  - (b) transaction records and history including names of counterparties to transactions, bank account or wallet address information of counterparties to transactions, transaction order details (time, timestamp, amount, payment gateway, etc.), transaction type (virtual asset, fiat currency, etc.);
  - (c) account data including account balance, user name, password, user profile photo, third party sign-in (if you log in to our services using credentials from a third party);
  - (d) wallet address, bank account information (account number, SWIFT code, ABA Number, CVC2, etc.), credit card information, deposit proof information, cryptocurrency address (on-chain address); and
  - (e) IP address, browser type and version, time zone settings, browser plugin types, operating systems or platform and device data (including where the IMEI number of mobile device, wireless networks and general network data).
8. Corporate clients may be required to provide us with, including but not limited to the following data:

- (a) certificate of incorporation;
  - (b) location of headquarters (utility bill and office address, etc.);
  - (c) names of affiliated entities;
  - (d) official list of directors and beneficial owners;
  - (e) articles of association;
  - (f) memorandum;
  - (g) organisational ownership chart; and
  - (h) financial history and details (investment activity, bank statements, balance sheets, etc.).
9. PANTHERTRADE may also obtain your personal data from publicly available sources of information, recording telephone conversations and/or communications by using electronic media, or from third party risk intelligence applications that you have made public via your privacy settings with that third party.
10. PANTHERTRADE may also collect the following technical data automatically when you visit our website and/or the Platform:
- (a) IP address, cookies;
  - (b) login information;
  - (c) operating system;
  - (d) submit source (Web, App, Wap);
  - (e) device type, model and related operation system;
  - (f) device ID: OAID, Android ID, IDFV, IDFA, GAID, IMEI;
  - (g) telecom operator type;
  - (h) browse (plug-in) type and version;
  - (i) time and date of consent and platform;
  - (j) language, geographical location and time zone settings;
  - (k) apps list;
  - (l) MAC address;
  - (m) Device information and logs;
  - (n) information about your visit: products you viewed, searched for, filtered or purchased, the hyperlinks you have clicked, site usage including page viewed and page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs) and methods used to browse our website; and
  - (o) diagnostic data: crash logs URL clickstream.
11. Your personal data and non-personal data will be recorded when you visit our website and/or the Platform, used for the purposes of data analysis, including analyzing the number of visitors to the website and/or the Platform. This may include saving cookies to your computer or mobile device. Cookies are data files stored on your browsers. Our website automatically installs and uses cookies on your browsers when you access it, which are used to store your preferences, enhance the function of our website, and facilitate your browsing. The cookies used in connection with our website do not contain personal data. You may refuse to accept cookies on your browsers by modifying the settings in your browsers or internet security software. However, if you do so you may not be able to utilise or activate certain functions available on our website. For further information on how we make use of cookies, please refer to our Cookie

Policy enclosed as Appendix 1 to this Statement.

12. We will only use the personal data we collect for the purposes set out in this Statement. We will obtain your consent before using your personal data for other purposes, unless otherwise permitted by applicable law. If you do not supply the personal data requested, we may not be able to provide or continue to provide our services to you, including without limitation, providing you with the Virtual Asset Services. Your personal data (whether individually, or aggregated with the personal data of other people) may be used for the following purposes:
- (a) administering your accounts and providing you with our products or services;
  - (b) verifying your identity as part of the initial and on-going KYC due diligence process and otherwise for the purposes of complying with anti-money laundering laws and regulations which we are subject to;
  - (c) conducting matching procedures (as defined in section 2 of the PDPO, which broadly includes comparison of two or more sets of your personal data, for the purpose of taking actions adverse to your interests, such as declining an application);
  - (d) registering you for investor-related events, activities and materials;
  - (e) conducting or arranging for you certification services recognized by the Electronic Transactions Ordinance (Cap. 553 of the laws of Hong Kong) such as services provided by certification authorities in Hong Kong or other places for client identity verification purposes;
  - (f) dealing and processing with service applications, subscriptions and registration submitted by you for our products and services;
  - (g) performing credit checks, verification procedures, data verification, due diligence and risk management processes;
  - (h) assisting other financial institutions to conduct credit checks and collect debts;
  - (i) designing and launching the Virtual Asset Services and other related services and products for your use;
  - (j) designing new and/or enhancing existing services, products, activities, and/or other events relating to our products or services;
  - (k) responding to and processing your enquiries and taking further actions or do follow-ups as required;
  - (l) promoting and marketing certain existing and future services and products to you (please refer to the section entitled "Use of Data in Promotion and Direct Marketing" below for further details);
  - (m) providing you with information regarding the market insights in connection with our products or services;
  - (n) providing you with the online services available at our website and/or through other telecommunication channels;
  - (o) determining the amount of debt owed to us by you, your guarantors and/or your security providers (if applicable);
  - (p) collecting debts from you, your guarantors and your security providers (if applicable);
  - (q) complying with any applicable laws, rules, regulations, court orders or the requests or requirements of any regulatory body and carrying out obligations arising from any agreements entered between you and PANTHERTRADE;

- (r) enabling any of our actual or proposed transferees / assignees to assess any proposed merger, re-organisation or other similar process;
- (s) any purposes allowed by applicable laws;
- (t) defending our rights or participating in any legal or administrative proceedings;
- (u) observing the requirements by the SFC and/or the laws and/or regulatory rules in Hong Kong and/or other places;
- (v) conducting marketing research, surveys, analysis and other similar activities from time to time;
- (w) generating unique internal identification numbers for organisational and reporting purposes and other forms of statistical analysis;
- (x) generating anonymised statistics, information and reports in relation to, or for the purpose of, the design of our financial products and services and/or the marketing or provision of our services;
- (y) compiling general statistics in relation to the number of visitors to our website and the usage of our website;
- (z) using your personal data for AI analytics;
- (aa) using the information that our website collects about you to improve your experience while using our services; and
- (bb) any functions related to the foregoing.

13. PANTHERTRADE may be required to retain, process and/or disclose your personal data to agents, contractors or other third party service providers, to which PANTHERTRADE does not assume any liability for any loss or damage that you may sustain, in order to:

- (a) comply with a court order, subpoena or other legal process (whether in Hong Kong or elsewhere);
- (b) comply with applicable laws and regulations;
- (c) comply with a request by a government authority, law enforcement agency or similar body (whether situated in Hong Kong or elsewhere);
- (d) provide to the third party database for submitting behaviors concerning anti-money laundering, terrorism financing, evading trade and economic sanctions;
- (e) provide to a third party which provide services (such as legal, financial, management, operation, market surveillance, analytic or technical services) or is associated or acting as a nominee to PANTHERTRADE;
- (f) provide to any third party to whom PANTHERTRADE's businesses or any part of PANTHERTRADE's businesses will be sold, assigned or transferred to, if applicable; or
- (g) retain, process and/or disclose your personal data in order to enforce any agreement with you, protect PANTHERTRADE's rights, property or safety, or the rights, property or safety of PANTHERTRADE's employees and agents.

### **De-identified or Aggregate Information**

14. We may use the information we have about you to create de-identified or aggregate information, such as de-identified demographic or location information, information about devices used to access our services, or other relevant analyses. Such data cannot be associated with a specific individual. We may perform our analytics on such data or share it with any third parties.

### **Third Party Websites**

15. Our website and/or Platform may from time to time contain linkages to other websites. These other websites are independent from our website and/or Platform. PANTHERTRADE has no control or management over the contents of such other websites or their privacy policies or compliance with the law. You should be fully aware that the provisions of such linkages do not constitute an endorsement, approval, or any form of association by or with PANTHERTRADE and PANTHERTRADE has no control over the personal data submitted by you, if any, to other websites.

### **Our Policy Towards Children**

16. Our Virtual Asset Services are not intended for children, so we restrict anyone below the age of 16 years or below the age of legal majority in the relevant jurisdiction to use our services. We do not knowingly or intentionally collect and process any data related to children.

17. We are unable to identify whether a child has provided us personal data without the KYC process. If we become aware that a child has provided us with personal data, we will take steps to delete such information as soon as possible.

### **Disclosure of Personal Data**

18. Personal data held by PANTHERTRADE will be kept confidential, but may be disclosed to the following persons for one or more of the purposes set out in paragraph 12 above:

- (a) any of our officers, employees, agents, affiliates, contractors, or third party service providers who provide administrative, credit data, debt collection, telecommunications, client verification, due diligence, computing, payment, promotional, marketing, data processing, data storage, data analytics or other services related to our business operations to us (e.g. IT vendors, electronic storage vendors, biometric authentication service providers, custodian, etc.);
- (b) any member of the Group;
- (c) any of your guarantors and security providers or prospective guarantors and security providers;
- (d) any counterparty trading with or intending to trade with you, or any of your counterparties in a trade;
- (e) credit data service institutions or debt collecting institutions (where you owe us money or where there has been an event of default);
- (f) any actual or proposed assignee or transferee of PANTHERTRADE, or participant or sub-participant or transferee of PANTHERTRADE in respect of our rights against you;
- (g) any person or entity or data recipient who has already established or intends to establish any business relationship with PANTHERTRADE;
- (h) any certification authority whether in Hong Kong or other places; and
- (i) any local or foreign regulatory agency, body, government, tax authority, law enforcement agency, administrative or statutory agency in Hong Kong or other places for compliance with applicable laws, regulations, rules or guidelines.

19. PANTHERTRADE will adopt contractual and/or other means to ensure the agents, contractors or other third party data processors who process personal data on behalf of PANTHERTRADE will take all reasonable steps to (a) protect the personal data they hold against unauthorized or accidental access, processing, erasure, loss or use; and (b) ensure that personal data will not be kept longer than necessary.
20. PANTHERTRADE may transfer your personal data to a place outside Hong Kong in accordance with this Statement. Your personal data may not be afforded the same or similar level of protection as it is under the PDPO.
21. As PANTHERTRADE continues to develop its business, it may reorganise its business structure, undergo a change of control or business combination. In these circumstances it may be the case that your personal data is transferred to a third party who will continue to operate PANTHERTRADE's business or a similar service under either this Statement or a different privacy policy and personal information collection statement which will be notified to you. Such a third party may be located, and use of your personal data may be made in connection with such acquisition or reorganisation outside your country of location (i.e. Hong Kong).

### **Use of Data in Promotion or Direct Marketing**

22. PANTHERTRADE may use your personal data to send you information about products, services and other marketing materials such as news, promotions, events and marketing offers that we think you might be interested in.
23. You can choose to receive direct marketing materials by email, direct mail and/or other means. If you do not wish to receive such direct marketing materials, you may elect to opt-out at any time by contacting our Customer Service Department. PANTHERTRADE intends to use your personal data for direct marketing purposes, for which we have to obtain your consent (which includes an indication of no objection). In this regard, please note that:
  - (a) your name, contact details, product and service, account information, trading patterns and history, financial background and statistics held by PANTHERTRADE from time to time may be used for direct marketing;
  - (b) the following categories of services, products and subjects may be marketed to you:
    - i) finance, insurance, securities, commodities, investment and related services and products and facilities;
    - ii) reward, loyalty, co-branding or privileges programs and related products and services;
    - iii) financial or banking products and services offered by our business partners (the names of such partners will be provided to you); and
    - iv) donations and contributions for charitable and/or non-profit making purposes;
  - (c) the above services, products and subjects may be marketed by PANTHERTRADE and/or the following persons:
    - i) any member of the Group;
    - ii) third party financial institutions, underwriters, securities, commodities and investment service providers;
    - iii) providers of third party reward, loyalty, co-branding or privileges program (the names of such co-branding partners will be provided to you);

- iv) our business partners;
- v) charitable and/or non-profit organisations;
- (d) in addition to promoting the above services, products and subjects, PANTHERTRADE may provide the personal data mentioned in paragraph 23(a) to any of the persons as mentioned in paragraph 23(c) above for the purpose of promoting their services, products and subjects. In order for us to do so, we need to obtain your consent (which includes an indication of no objection) for this purpose;
- (e) if you do not wish PANTHERTRADE to use or provide your personal data to other persons for the direct marketing purposes set out in paragraph 23(d), please notify our Customer Service Department; and
- (f) we may receive money or other property in return for providing your personal data to the other persons in paragraph 23(d) and, when requesting your consent or no objection we will inform you if we will receive any money or other property in return for providing the personal data to the other persons.

### **Providing Another Person's Personal Data**

24. Where you provide to us personal data about another person, you must give to that person a copy of this Statement and, in particular, tell him/her that you have provided us with their personal data and how we may use his/her personal data.

### **Personal Data Protection Measures**

25. All personal data provided to PANTHERTRADE will be securely stored with restricted access by authorized personnel only. We utilize encryption/security software for data transmission so as to protect your data via encrypting it in a secure format to ensure its privacy and security from unauthorised access or disclosure, accidental loss, alteration or destruction.
26. PANTHERTRADE implements protective measures to safeguard and secure personal data to ensure it is protected against unauthorized or accidental access, processing, erasure, loss or use; and prevent any personal data from being kept longer than is necessary for processing of the data. These measures include the following:
- (a) access or use of such data is limited to authorized staff or agents on a "need to know" basis and such data is accessed utilizing secured methods (e.g. personal data is encrypted when necessary);
  - (b) we do not distribute your personal data to other persons except to the classes of transferees set out in this Statement and for the purposes set out in this Statement;
  - (c) the use and transfer of your personal data between members of the Group is subject to strict internal security standards, confidentiality policies, privacy laws and other applicable laws;
  - (d) we ensure that our employees fully comply with such standards, policies and laws; and
  - (e) we provide training to our staff on the proper handling of your personal data.
27. As we further develop new products and services, we will continue to make every effort to ensure that your personal data is properly used and protected.
28. Nevertheless, the transmission of information via the internet is not completely secure.



Although PANTHERTRADE will do its best to protect your personal data, PANTHERTRADE cannot guarantee the security of data transmitted to our website and/or the Platform. Once your personal data is received, PANTHERTRADE will use strict procedures and security features to try to prevent unauthorized access.

### **Data Access and Correction Requests**

29. According to and in accordance with the terms of the PDPO, you have the right to:
- (a) obtain information regarding the processing of your personal data and access the personal data which we hold about you;
  - (b) request that we rectify your personal data if it is inaccurate or incomplete; and
  - (c) lodge a complaint with the privacy commissioner for personal data if you think that any of your data privacy rights have been infringed by us.
30. We will take practical steps as needed to erase personal data that is no longer required for the purpose for which the data is used, unless erasure is prohibited by applicable law or is not in the public interest. You may ask that we erase some or all of your personal data, but please note that it may not be legally or operationally possible for us to do so.
31. If there is a change to any of the personal data that you have provided to us, please contact our Customer Service Department.
32. You should send written requests for access to, and correction of, your personal data to us by email at:
- Attention: Customer Service Department  
Panthertrade (Hong Kong) Limited  
Email: support@panthertrade.com
- Please indicate your name, PANTHERTRADE account number and contact number for us to follow up with your request. You may be asked to provide additional information to authenticate your identity in order for us to follow up your request.
33. In accordance with the terms of the PDPO, PANTHERTRADE reserves the right to charge a reasonable fee for processing any data request.
34. PANTHERTRADE will take reasonable steps to ensure the accuracy of your personal data held by PANTHERTRADE. If PANTHERTRADE becomes aware that the personal data is inaccurate, PANTHERTRADE will not use such data and will notify any third party to which such personal data has been transferred regarding the same.
35. Nothing in this Statement shall limit your rights under the PDPO.

### **Retention Period of Personal Data**

36. We will not keep personal data longer than is necessary for the fulfillment of the purpose for which it was collected unless a longer retention period is required or permitted by applicable laws, rules and regulations, but no shorter than five (5) years. The retention period of personal data collected depends on different factors, including:

- (a) usage: we may have to continue to retain the personal data for the purpose(s) for which it was collected for; and
- (b) legal obligations: there may be minimum retention periods for that personal data, as stipulated in applicable laws and regulations.

### **Termination or cancellation**

37. Should your relationship with PANTHERTRADE be cancelled or terminated at any time, PANTHERTRADE shall cease processing your personal data as soon as reasonably practicable following such cancellation or termination, provided that PANTHERTRADE may keep copies of the data as is reasonably required for reasonable purposes, such reasonable purposes shall include keeping of records, use in relation to any actual or potential dispute, complying with applicable laws and regulations, and protecting PANTHERTRADE's rights, property or safety, or the rights, property or safety of PANTHERTRADE's employees and agents.

**Note:** In case of any discrepancy between the English and Chinese versions of this Statement, the English version shall prevail.

# Appendix 1 Cookies Policy

PANTHERTRADE's website and/or the Platform may use cookies to store information on your computer/mobile device. This policy explains how Panthertrade (Hong Kong) Limited or its affiliates (together "PANTHERTRADE", "we" or "us") use cookies and it may be amended, from time to time, without notice. By using our website/application represents that you agree to the placement of cookies on your computer/mobile device in accordance with the terms of this policy. If you do not wish to accept cookies from our website/application please either disable cookies or refrain from using our website/application. Please note that by disabling cookies in your browser settings our website and/or the Platform may not function properly.

## 1. What are Cookies?

A cookie is a text-only string of information that a website/application transfers to the cookie file of the browser on your computer's hard disk/mobile device so that the website/application can recognise you when you revisit and remember certain information about you. This can include which pages you have visited, choices you have made from menus, any specific information you have entered into forms and the time and date of your visit.

## 2. Types of Cookie

There are two main types of cookies:

1. Session cookies: these are temporary cookies that expire at the end of a browser session; that is, when you leave the website/application. Session cookies allow the website/application to recognise you as you navigate between pages during a single browser session and allow you to use the website/application most efficiently.
2. Persistent cookies: in contrast to session cookies, persistent cookies are stored on your equipment between browsing sessions until expiry or deletion. They therefore enable the website/application to recognise you on your return, remember your preferences, and tailor services to you.

In addition to session cookies and persistent cookies, there may be other cookies which are set by the website/application which you have chosen to visit, such as our website and/or the Platform, in order to provide us or third parties with information.

## 3. Our use of Cookies

We use session cookies to:

- help us maintain security and verify your details whilst you use the website/application as you navigate from page to page, which enables you to avoid having to re-enter your details each time you enter a new page.

We use persistent cookies to:

- help us recognise you as a unique user when you return to our website/application so that you do not have to input your details multiple times as you move between our pages or services;

- remember how you have customised your use of our website and/or the Platform, such as the region that you are in; and
- collect and compile anonymous, aggregated information for statistical and evaluation purposes to help us understand how users use the website/application and help us improve the structure of our website/application.

Many cookies are designed to give you optimal usage of the website/application. For example, we use cookies to enable you to improve your user experience when using our website/application, e.g. a cookie which recognises if your browser supports specific technology features. This helps, for example, in enabling web pages/application to be loaded more quickly when you request the download of a large file.

Some of our cookies may collect and store your personal information, enable the website/application to recognise you on your return and remember your preferences setting. We are committed to respecting and protecting your privacy and will ensure that all personal information collected by us is kept and treated in accordance with our privacy policy.

#### **4. Refusing Cookies on this Site**

Most browsers are initially set to accept cookies. However, you have the ability to disable cookies if you wish, generally through changing your internet software browsing settings. It may also be possible to configure your browser settings to enable acceptance of specific cookies or to notify you each time a new cookie is about to be stored on your computer/mobile device enabling you to decide whether to accept or reject the cookie. To manage your use of cookies there are various resources available to you, for example the "Help" section on your browser may assist you. You can also disable or delete the stored data used by technology similar to cookies, such as local shared objects or flash cookies, by managing your browser's "add-on settings" or visiting the website of its manufacturer. As our cookies allow you to access some of our website/application's features we recommend that you leave cookies enabled. Otherwise, if cookies are disabled, it may mean that you experience reduced functionality or will be prevented from using our website and/or the Platform altogether.