

PRIVACY POLICY

This Privacy and Security Policy explains how HHO Consulting Limited, collects personal data about you and how it maintains, uses and discloses that data. HHO Consulting Ltd. is committed to protect the privacy of all personal data which is obtained from you, including the data we obtain during your visits to our websites. HHO Consulting Ltd. handles, retains and processes your data only insofar as this is in accordance with the applicable legal requirements and only to the extent it is necessary for the achievement of the purposes set out herein.

What information do we collect from you?

In order for HHO Consulting Ltd. to provide its clients with the investment services, HHO Consulting Ltd. is required to collect, process and retain personal data of its clients in accordance with mandatory legal requirements. This includes, among others, your date of birth, your address, a certified photocopy of your national ID card, passport or other form of ID and a certified photocopy of a recent utility bill or other proof of address. HHO Consulting Ltd. also collects and processes personal information about you that is necessary for it to provide you with its services, as listed below in the section "How do we use and share your personally identifiable information?" This includes information about you when you complete an online application or another type of form and when you access and trade through your trading account. Additionally, we may also obtain personal information as a result of authentication or identity checks, including checks with credit reference agencies (who may keep a record of the information) to prevent fraud. HHO Consulting Ltd. may also derive information from your use of its websites and software client and may store this information with your personal profile. This information may include site areas visited, pages viewed, frequency and duration of visits, Internet Protocol (IP) address, computer identification parameters, types of transactions conducted, documents downloaded, mouse clicks, mouse movements, scrolling activity as well as text you type in this website and which website referred you to ours or to which websites you link.

Links

When you use the HHO Consulting Ltd. websites, you may be able to link to other websites. This Privacy & Security Policy does not apply to those other sites which we link to and HHO Consulting Ltd. is not responsible for any personal information collected by third parties via those other sites.

Processing of personal information

Access to personal information is restricted to those employees, partners, contractors and affiliates of HHO Consulting Ltd. (including without limitations, parent, sister and subsidiary companies) who need to access such information for the purposes described in this policy.

Those with access to personal information are obligated to comply with strict standards of confidentiality when managing personal and other data.

Security

HHO Consulting Ltd. makes efforts to maintain the appropriate safeguards in order to ensure that the security, integrity and privacy of the data and personal information that you have provided is not misused. Such measures and safeguards include encryption during data transmission, strong authentication mechanisms and the separation of machines and data to provide secure areas. While such systems and procedures reduce the risk of security breaches, they do not provide absolute security. Therefore, HHO Consulting Ltd. cannot guarantee that our service will be immune from any wrongdoings, malfunctions, unlawful interceptions or unauthorized access to the information stored therein and to other information security risks, or that your private communications on or through our service will remain private.

How do we use and share anonymous statistical information?

HHO Consulting Ltd. collects anonymous statistical information in order to ensure that it meets the needs of its clients. By collecting such data, HHO Consulting Ltd. is able to monitor and improve the services which it offers to its existing and potential clients. We may share such information with third parties.

How do we use and share your personally identifiable information?

HHO Consulting Ltd. may use your personal information and share it with partners, contractors, service providers, advisors, transaction processors and affiliates of HHO Consulting Ltd. (including parent, sister and subsidiary companies) (the "Partners") for the following purposes only, or subject to your explicit consent:

- to provide you the services that you have requested including processing transactions;
- to confirm your identity;
- to assess your suitability to the products and services we provide;
- to maintain your personal profile;
- to manage your account;
- to contact you when necessary or appropriate in relation to the services being provided to you, including via a third-party mailing platform;

- to keep you updated while you are a client in relation to matters such as contracts you have traded and activities of HHO Consulting Ltd;
- to manage and administer the products and services provided to you;
- for marketing purposes, including, but not limited to providing you with information regarding the products and services offered by HHO Consulting Ltd. and its Partners;
- to develop an understanding of the products and services that you may be interested in obtaining from HHO Consulting Ltd. and to tailor the website to your needs and interests;
- to create impersonalized statistical data;
- to conduct surveys and questionnaires;
- to enforce the governing terms and conditions;
- if HHO Consulting Ltd. believes that you have breached the governing terms and conditions, or abused your rights to use the services, or performed any act or omission that HHO Consulting Ltd. believes to be violating any applicable law, rules, or regulations, then HHO Consulting Ltd. may share your information with law enforcement agencies and other competent authorities as well as with other third parties, as may be required;
- if HHO Consulting Ltd. is required, or believes that it is required by law to share or disclose your information to financial authorities or to any other third party;
- In any case of dispute, or legal proceeding of any kind between you and HHO Consulting Ltd., or between you and other clients or third parties with respect to, or in relation with the services which HHO Consulting Ltd. provides;
- In any case where HHO Consulting Ltd. believes that sharing information is necessary to prevent imminent physical harm or damage to property;
- If HHO Consulting Ltd. organizes the operation of its services within a different framework, or through another legal structure or entity, or if HHO Consulting Ltd. is acquired by, or merged with another entity, provided however, that those entities agree to be bound by the provisions of this policy, with respective changes taken into consideration;

Choice and opt-out

In the registration process with HHO Consulting Ltd. as a client, you will be given the option to opt-out of subscribing to the following additional services:

- Marketing services, which provides you with information regarding the products and services offered by HHO Consulting Ltd. or its partners; and opportunities that we believe may be relevant to you; Client orders, liaise with HHO Consulting Ltd.;
- Newsletters;
- SMS (text) messages;
- Other electronic communications.

If you no longer wish to receive the above-mentioned communications, you may opt-out of receiving them by following the instructions included in each communication.

Transfer of data to third countries

Personal data may be transferred by HHO Consulting Ltd to third parties in European Economic Area Member States as well as to non-European Economic Area Member States for the purposes described in this policy. You give your express and unambiguous consent to such transfer.

Updating your information

You may inform HHO Consulting Ltd. at any time that your personal details have changed or that you wish HHO Consulting Ltd. to delete personal information we hold about you by emailing us at cs@trade-oro.com. We will change or delete your personal information in accordance with your instructions, except to the extent that we are required to hold your personal information for regulatory or legal purposes, to provide you with the services you have requested or to maintain adequate business records. In any case, HHO Consulting Ltd. may keep any aggregated or anonymized information for the purposes described in this Privacy and Security Policy, indefinitely.

Cookies

Cookies are small files of information, which often include a unique identification number or value, which are stored on your computer's hard drive as a result of your use of the HHO Consulting Ltd. trading software and/or access of its websites. We use both session ID cookies and persistent cookies. A session ID cookie expires when you close your browser. A persistent cookie remains on your hard drive for an extended period of time. We set a persistent cookie for statistical purposes. Persistent cookies also enable us to track and target the location and the interests of our users and to enhance the experience of our services on our site.

You can remove persistent cookies by following directions provided in your Internet browser's "help" file. If you do not wish to receive cookies altogether, you may be able to change the settings of your browser to refuse all cookies or to have your computer notify you each time a cookie is sent to it, and thereby give yourself the choice whether to accept it or not. However, this may impair the quality of the services that we provide to you in relation to your account. Some persistent cookies, such as Flash cookies, cannot be removed and cannot be blocked by changing your browser's settings.

Some persistent cookies will not be removed or blocked by your internet browser. If you wish to disable all cookies, please send a request to cs@trade-oro.com.

Remarketing with Google Analytics

We may use the information we collect to assist us in delivering relevant ads to you (Remarketing). Remarketing is a way for us to connect with our websites and ads visitors,

based upon their past interactions with our website and ads. Third-party marketing vendors may be hired by HHO Consulting Ltd. to perform such remarketing services. As a result, third-party vendors, including Google, may show HHO Consulting Ltd.'s ads on internet sites. Such third-party vendors, including Google, may also use their cookies, third party cookies and similar technologies to serve ads based on a visitor's prior visits to HHO Consulting Ltd.'s website.

You may opt out of Google Analytics for Display Advertisers and opt out of customized Google Display Network ads by visiting Google's Ads Preferences Manager. You are also encouraged to visit Google Analytics Opt-out Browser Add-on. For further information you can also visit Google's privacy center.

What are your rights?

You do not have to provide us with any of the personal data requested by HHO Consulting Ltd. However, without providing the information requested in the application form, HHO Consulting Ltd. may not be able to open an account for you, or to provide you with any other services, information or assistance you have sought or evaluate the appropriateness of the service you are requesting.

Enforcement

HHO Consulting Ltd. is doing its utmost to comply with this Privacy and Security Policy. If you have any questions, concerns or complaints regarding this Privacy and Security Policy and the enforcement thereof, please refer them to: support@trade-oro.com. After receiving your complaint, HHO Consulting Ltd. may contact you to better understand your concerns and will make all efforts to promptly answer your question, or resolve your complaint to your full satisfaction.

Amendments to policy

HHO Consulting Ltd. may change and update the terms of this Privacy and Security Policy from time to time. All changes will take effect seven (7) days after their initial posting on the Website, unless HHO Consulting Ltd. amends the Privacy and Security Policy to comply with legal or regulatory requirements. In the latter cases the amendments will become effective as required, or ordered.

Governing Law

In respect of issues not addressed in the present Privacy and Security Policy, the laws of Marshall Islands will apply.