

Privacy Policy

Regain Capital (A brand under the Top Wealth International Ltd.) is fully committed to safeguarding users privacy online or otherwise and we ensure to maintain our trust with all our customers. This Privacy Policy provide a summary of the type of personal information that we collect, how such information is used, transferred/disclosed if necessary and stored. The policy does not cover any external third party websites that may be accessed through links provided on our website.

(A) INFORMATION COLLECTION

We collect two types of information from our customers and/or users of our website, including:

- Personal information, which includes but is not limited to the client's name, identification, date of birth, passport number, residential address, employment details, information relating to financial circumstances, investment experience (collectively "Personal Information"); and
- Traffic pattern information relating to the users on our website.

Personal Information is collected at the time when the client applies for a REGAIN CAPITAL trading account (this would include a demo account as well) and through any other communications that the client may have with our representative(s) during the course of their relationship with us. REGAIN CAPITAL will limit the collection of Personal Information to what is necessary in order for us to provide you with the required products and services.

REGAIN CAPITAL may also collect other information from time to time, such as through client surveys used for research and feedback purposes in our efforts to continuously improve on the quality of our services and the products we offer. Personal Information collected online may be consolidated with other information provided to REGAIN CAPITAL by the client either via physical copies or other sources. Information may also be collected indirectly from monitoring or other means such as recording of telephone calls and monitoring of emails. In these circumstances, the information is not accessed on a continuous or routine basis, but may be used for compliance or security purpose.

Traffic pattern information includes information on webpages accessed by users, and the number of users who frequent our website and/or our trading platform(s), etc. Such information is anonymous and only used in an aggregated form. We also collect information through 'Cookies', which are further explained below.

(B) PURPOSE FOR COLLECTION, PROCESSING AND DISCLOSURE OF PERSONAL DATA

Collection

Generally, Personal Data and aggregated information collected are used for the following purposes:

- To provide our products and/or services to our customers, which shall include:

- the execution or administration of any transaction(s) requested and/or authorized by our customers;
- the maintenance, servicing and/or termination of our customers' accounts;
- To enhance the content and user experience of our website and to notify our customers of such enhancements/upgrades/updates
- To disseminate/distribute information for marketing purposes about products and/or services offered that are similar or related to the products and/or services provided or previously provided to the client. (Do note that the client is always able to contact us to stop receiving such information via the unsubscribe facility or to contact us accordingly.)
- For legal and compliance reasons on our part under applicable laws, which shall include:
 - conduct of due diligence procedures for the opening of accounts and ongoing monitoring purposes;
 - other monitoring and compliance procedures in line with our internal risk management procedures, audit/financial accounting and for management reporting purposes;
 - execution of bank withdrawals and/or deposits;
 - enforcement of legal rights;
 - where information is to be disclosed to law enforcement agencies and other relevant authorities for crime prevention and detection purposes;

Processing and Disclosure

Please note that REGAIN CAPITAL may share, process and disclose Personal Information under the following circumstances:

- disclosure to our parent company and/or group companies, who are permitted to use, process and/or disclose Personal Information for a valid business or legal purpose, including:
 - the execution or administration of any transaction(s) requested and/or authorized by our customers;
 - the maintenance, servicing and/or termination of our customers' accounts;
 - disclosure to business partners or third-party service providers on a need-to-know basis who would be bound by non-disclosure agreements to the extent as set out in the agreements unless otherwise permitted by law – this may include verification of your identity and the authenticity of the supporting documents provided as evidence of your identity via relevant government bodies, credit reporting agencies and/or any other agencies;
 - disclosure to REGAIN CAPITAL's legal counsels, accountants, auditors, and any other professional consultants;
 - disclosure to persons with legal/beneficiary interest to the client's account, including persons who are acting in a fiduciary, authorized representative and/or legal capacity;
 - disclosure as required by law and/or any applicable legal requirement(s) (including towards the prevention of any fraudulent, illegal or unlawful transaction, claim or liability) to

governmental, regulatory and/or law enforcement agencies and/or in compliance with any judicial process and assistance rendered for any legal and/or regulatory investigations;

Please note that REGAIN CAPITAL may also share and/or disclose non-personal and non-individualistic information in the aggregate or anonymized form with third-party service providers for business purposes.

REGAIN CAPITAL does NOT share, process or disclose Personal Information to business partners or third-party service providers for marketing purposes.

(C) TRANSFER OF PERSONAL INFORMATION OVERSEAS

To the extent that REGAIN CAPITAL may need to transfer Personal Information outside of Canada (such as for data storage, data management and/or consolidation purposes), whether to our parent company, group companies, business partners or third-party service providers or simply to data storage facilities, we shall do so in accordance with the Personal Data (Privacy) Ordinance (Cap 486) ("PDPO") and ensure that the standard of protection applied to Personal Information so transferred is comparable to the protection required under the PDPO.

(D) CONSENT

REGAIN CAPITAL (including its employees, directors and/or representatives) is required by law to keep Personal Information strictly private and confidential, save and except as set out in this Privacy Policy, we will not disclose any Personal Information without having obtained your prior consent to do so, unless otherwise permitted by law.

Generally, when REGAIN CAPITAL requests for Personal Information in the course of providing you a service and/or product and where you provide us with such Personal Information, there is implied consent that you agree to provide us with your Personal Information in order for us to provide you with the requested service and/or product.

In some circumstances and as required by applicable law, we will seek your express consent when collecting your Personal Information. This is particularly where fresh consent is required for a new purpose in which your Personal Information will be used.

By providing Personal Information relating to a third party (such as (but not limited to) information of your spouse, children and/or parents) to us, you represent and warrant that the consent of that third party has been obtained for the collection, use and/or disclosure of the Personal Information for the purposes listed here.

You may withdraw your consent at any time by contacting us. However, please note that if you withdraw your consent to any or all purposes set out in this Privacy Policy and depending on the nature of your withdrawal request, this may (materially or otherwise) affect the way in which REGAIN CAPITAL is able to provide its service(s) and/or product(s) to you.

(E) RETENTION

Personal Information will be held for as long as it is necessary to fulfill the purpose for which it was collected, or as required or permitted by applicable law. REGAIN CAPITAL shall cease to retain Personal Information or remove the means by which Personal Information can be associated with particular customers, as soon as it is reasonable to assume that the purpose for which that Personal Information was collected is no longer valid and retention is no longer necessary for legal or business purposes.

(F) CORRECTION AND ACCURACY

REGAIN CAPITAL endeavors to ensure that your Personal Information is as accurate and up-to-date as possible. We usually send out an annual reminder to our customers to inform us of any change to their Personal Information or business information. However, you may contact us at any time if you wish to correct, amend or update your Personal Information or business information (for our corporate customers). Customers should contact their account representative and individuals who are not customers should contact service@regaincapital.com.

(G) RIGHTS TO ACCESS

You are also entitled to certain access rights to your Personal Information. To make a request, please contact us by completing this form; whereupon your request will be acknowledged and acted upon generally within thirty (30) days of receipt of such request. If for any reason, we are unable to accede to your request, you will be notified accordingly.

Please note that REGAIN CAPITAL is entitled to charge a reasonable administrative fee for this service which you will be advised of prior to us acting upon the request.

(H) SECURITY SAFEGUARDS

REGAIN CAPITAL has in place various security procedures, technical and organizational measures to safeguard your Personal Information. To protect against external attacks, we have in place robust firewalls and security measures to detect, isolate and prevent hacking and other malware intrusions to our IT systems.

Further REGAIN CAPITAL employees also undergo periodic security awareness programs to create awareness in information security so that employees are able to identify and respond appropriately to security risks.

We use all reasonable efforts to safeguard your Personal Information. However, you should be aware that the use of the Internet is not entirely secure and for this reason, we cannot guarantee the security or integrity of any Personal Information which is transferred from you or to you via the Internet. You should also be mindful that you are responsible for keeping your access rights confidential and secure at all times.

(I) PRIVACY POLICY UPDATES

This Privacy Policy is amended from time to time or as and when it is required. Such changes to our Privacy Policy shall apply from the time that the same is posted on this website. Your continued use of our website will be taken as acceptance of the updated Privacy Policy, but we will seek your fresh consent before we collect more Personal Information from you or if we wish to use or disclose your Personal Information for new purposes.

(J) USE OF COOKIES

REGAIN CAPITAL uses cookies to collect information. A cookie is a text file made up of letters and numbers that allow us to distinguish your browser/device from another user's browser/device. This text file is stored on your computer's hard disk for the purpose of keeping records when you visit a website.

Currently, we make use of cookies to help manage the site and your user experience. These cookies may be used to collect analytics of non-personal user activity outlines, manage

personal preferences, provide relevant or timely information to you or offer focused advertisements.

Cookies set across our site, which include third-party cookies, can be in the form of session or persistent cookies, and may use different technologies, such as JavaScript or Flash. If you would like to 'opt-out' of the cookies set by our site, this can be accomplished on a cookie-by-cookie basis subject to your browser settings. In doing so, you may find that it may limit site operation or functionality. Please visit aboutcookies.org for more information and instructions on how to manage cookies.

REGAIN CAPITAL does not use cookies to retrieve information which was not originally sent in a cookie. We do not use information transferred through cookies for any direct promotional or marketing purposes without your consent.

(K) EUROPEAN UNION GENERAL DATA PROTECTION REGULATION (EU GDPR)

In addition to its obligations under the PDPO, REGAIN CAPITAL complies with its obligations to individuals in the EU as set out in the EU GDPR. As part of the REGAIN CAPITAL works in conjunction with Regain Capital A/S to adopt the appropriate internal and external data protection policies. Regain Capital A/S's Privacy Policy can be found here: <https://www.regaincapital.com/support/>

In the event that the EU GDPR requires a higher level of protection for the personal data of individuals in EU than the PDPO, such stricter requirements shall be complied with.

Pursuant to Article 27 of the EU GDPR, REGAIN CAPITAL has appointed Regain Capital A/S as our representative in the EU.

(L) GOVERNING LAW

This Privacy Policy has been drafted solely in accordance with the laws of Canada. We do not represent or warrant that this Privacy Policy complies with the privacy laws of any other jurisdiction and accordingly, you shall not construe this Privacy Policy as such.

In the case of any discrepancies between the English and Chinese versions of this document, the English version shall prevail.

(M) CONTACT US

If you have any comments and/or questions about this Privacy Policy or if you wish to make a specific complaint relating to our collection, use and/or disclosure of your Personal Information, please contact us at: service@regaincapital.com