

Privacy Policy

LAST UPDATED: May 2020

Futu Clearing Inc., and their respective subsidiaries and affiliates (collectively, the “**Company**”, “**we**”, or “**us**”) wants you to be familiar with how we collect, use and disclose information. This Privacy Policy describes our practices in connection with information that we collect:

- Through websites operated by us from which you are accessing this Privacy Policy (the “**Websites**”)
- through the software applications made available by us for use on or through computers and mobile devices (the “**Apps**”)
- through our social media pages and apps (collectively, our “**Social Media Pages**”), and
- through HTML-formatted email messages that we send to you that link to this Privacy Policy.

Collectively, we refer to the Websites, the Apps and our Social Media Pages, as the “**Services**”).

PERSONAL INFORMATION

“**Personal Information**” is information that identifies you as an individual or relates to an identifiable individual:

- Name
- Date of Birth
- Postal address
- Telephone number
- Username and password
- Futu brokerage account number
- Social Security number (to open a brokerage account)
- Copy of passport bio data page, driver’s license or other government-issued identity document
- Bank account number
- Email address
- Credit and debit card number
- Income and financial data
- Profile picture
- Social media account ID
- Messages or videos you post to the Forum
- Unique identifier(s) associated with your mobile device
- App Usage Information

Collection of Personal Information

We and our service providers collect Personal Information in a variety of ways, including:

- **Through the Services**
 - We collect Personal Information through the Services, for example, when you register an account to access the Services, or initiate a trade.
 - “**App Usage Information**” includes information about how you access and use our Services, such as your actions on the Services, including without limitation the username and password you use to log-in, your interactions with others on the Services, photos or media you upload to the Services, and other content you provide.
- **From Other Sources**
 - We receive your Personal Information from other sources, for example:
 - publicly available databases
 - relevant public data sources, such as news articles and government records
 - joint marketing partners, when they share the information with us
 - If you connect your social media account to your Services account, you will share certain Personal Information from your social media account with us, for example, your name, email address, photo, list of social media contacts, and any other information that may be or you make accessible to us when you connect your social media account to your Services account.

We need to collect Personal Information in order to provide the requested Services to you. If you do not provide the information requested, we may not be able to provide the Services. If you disclose any Personal Information relating to other people to us or to our service providers in connection with the Services, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Policy.

Use of Personal Information

We and our service providers use Personal Information for legitimate business purposes described in this Privacy Policy or as otherwise disclosed to you on our Services or in connection with our Services, including to:

- **Providing the functionality of the Services and fulfilling your requests.**
 - To provide the Services’ functionality to you, such as arranging access to your registered account, and providing you with related customer service.
 - To respond to your inquiries and fulfill your requests, when you contact us via one of our online contact forms or otherwise, for example, when you send us questions, suggestions, compliments or complaints, or when you request a quote for or other information about our Services.

- To complete your transactions, send you transactional information such as confirmations, invoices, technical notices, product and services information and announcements, updates, alerts, and provide you with related customer service.
- To send administrative information to you, such as changes to our terms, conditions and policies.
- To allow you to send messages to another person if you choose to do so.
- **Provide you with our newsletter and/or other marketing materials and facilitate social sharing**
 - To send you marketing related emails, with information about our services, new products and other news about our company.
 - To facilitate social sharing functionality that you choose to use.
- **Analyze Personal Information for business reporting and provide personalized services.**
 - To analyze or predict our users' preferences in order to prepare aggregated trend reports on how our digital content is used, so we can improve our Services.
 - To better understand you, so that we can personalize our interactions with you and provide you with information and offers or advertisements tailored to your interests and activity on the Services.
 - To better understand your preferences so that we can deliver content via our Services that we believe will be relevant and interesting to you.
- **Allow you to participate in sweepstakes, contests or other promotions.**
 - We may offer you the opportunity to participate in a sweepstakes, contest or other promotion.
 - Some of these promotions have additional rules containing information about how we will use and disclose your Personal Information.
- **Aggregate and/or anonymize Personal Information.**
 - We may aggregate and/or anonymize Personal Information so that it will no longer be considered Personal Information. We do so to generate other data for our use, which we may use and disclose for any purpose.
- **Accomplish our business purposes.**
 - For data analysis, for example, to improve the efficiency of our Services.
 - For monitoring, administering, enhancing, improving and modifying our Services, including troubleshooting, data analysis, testing, research, and statistical purposes.
 - For enhancing the safety and security of our Services, business, and users, detecting and preventing cyber-attacks or attempts to commit identity theft, and investigating or providing notice of fraud or unlawful or criminal activity.
 - For audits, to verify that our internal processes function as intended and are compliant with legal, regulatory or contractual requirements.
 - For developing new products and services.
 - For identifying usage trends, for example, understanding which parts of our Services are of most interest to users.

- For determining the effectiveness of our promotional campaigns, so that we can adapt our campaigns to the needs and interests of our users.
- For operating and expanding our business activities, for example, understanding which parts of our Services are of most interest to our users so we can focus our energies on meeting our users' interests.
- We may, but have no obligation to, monitor, record, and store App Usage Information or other Personal Information, in order to protect your safety or the safety of other users, to assist with regulatory or law enforcement efforts, to protect and defend our rights and property, or for other purposes set out in this Privacy Policy.
- **Comply with our legal obligations.**
 - To fulfill our legal obligations to perform identity verification and due diligence checks prior to establishing an account.
 - To fulfill other legal and regulatory obligations, such as obligations that apply to us as a regulated broker-dealer.

Disclosure of Personal Information

We disclose Personal Information:

- **To our affiliates for the purposes described in this Privacy Policy.**
- **To our third party service providers, to facilitate services they provide to us.**
 - These can include providers of services such as website hosting, data analysis, payment facilitation, trade clearing and settlement, information technology and related infrastructure provision, customer service, email delivery, auditing, targeted advertisement identification and delivery, mailing service, tax and accounting services, contest fulfillment and other services.
- **To third-party sponsors of sweepstakes, contests, and similar promotions.**
- **By using the Services, you may elect to disclose Personal Information.**
 - On the Forum or other message boards, chat, profile pages, blogs and other services to which you are able to post information and content (including, without limitation, our Social Media Pages). Please note that any information you post or disclose through these services will become public and may be available to other users and the general public.
 - Through your social sharing activity. When you connect your Services account with your social media account, you will share information with your friends associated with your social media account, with other users, and with your social media account provider. By doing so, you authorize us to facilitate this sharing of information, and you understand that the use of shared information will be governed by the social media provider's privacy policy.

Other Uses and Disclosures

We also use and disclose your Personal Information as necessary or appropriate, especially when we have a legal obligation or legitimate interest to do so:

- **To comply with applicable law and regulations.**
 - This can include laws outside your country of residence.
- **To cooperate with public and government authorities.**
 - To respond to a request or inquiry or to provide information we believe is important.
 - These can include authorities outside your country of residence.
- **For other legal purposes.**
 - To respond to subpoenas, court orders, legal process, law-enforcement requests, and legal claims;
 - To enforce our terms and conditions; and
 - To protect our rights, privacy, safety or property, and/or that of our affiliates, users or the public.
- **In connection with a sale or business transaction.**
 - We have a legitimate interest in disclosing or transferring your Personal Information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).

OTHER INFORMATION

“**Other Information**” is any information that does not reveal your specific identity or does not directly relate to an identifiable individual

- Browser and device information
- Information collected through cookies, pixel tags and other technologies
- Demographic information and other information provided by you that does not reveal your specific identity
- Information that has been aggregated in a manner such that it no longer reveals your specific identity

If we are required to treat Other Information as Personal Information under applicable law, then we may use and disclose it for the purposes for which we use and disclose Personal Information as detailed in this Policy.

Collection of Other Information

We and our service providers may collect Other Information automatically when you visit our online Services, in a variety of ways, read our emails, or otherwise engage with us online, including:

- **Through your browser or device:**

- Certain information is collected by most browsers or automatically through your device, such as your Media Access Control (MAC) address, computer type (Windows or Mac), screen resolution, operating system name and version, device manufacturer and model, and other device information, language, Internet browser type and version and the name and version of the Services (such as the App) you are using. We use this information to ensure that the Services function properly and to detect and prevent cyber-attacks.
- **Using cookies**
 - Cookies are pieces of information stored directly on the computer that you are using. Cookies allow us to collect information such as browser type, time spent on the Services, pages visited, language preferences and other traffic data. We and our service providers use the information for security purposes, to facilitate navigation, to display information more effectively, and to personalize your experience. We also gather statistical information about use of the Services in order to continually improve their design and functionality, understand how they are used and assist us with resolving questions regarding them. Cookies further allow us to select which of our advertisements or offers are most likely to appeal to you and display them while you are on the Services. We may also use cookies or other technologies in online advertising to track responses to our ads. We do not currently respond to browser do-not-track signals. If you do not want information collected through the use of cookies, most browsers allow you to automatically decline cookies or be given the choice of declining or accepting a particular cookie (or cookies) from a particular website. You may also wish to refer to <http://www.allaboutcookies.org/manage-cookies/index.html>. If, however, you do not accept cookies, you may experience some inconvenience in your use of the Services. You also may not receive advertising or other offers from us that are relevant to your interests and needs.
- **Using pixel tags and other similar technologies**
 - Pixel tags (also known as web beacons and clear GIFs) may be used to, among other things, track the actions of users of the Services (including email recipients), measure the success of our marketing campaigns, and compile statistics about usage of the Services and response rates. You may set your email options to prevent the automatic downloading of images that may contain technologies that would allow us to know whether you have accessed our email, used our Services, or performed certain functions with it.
 - **Analytics.** We may use Google Analytics, which uses cookies and similar technologies to collect and analyze information about use of the Services and report on activities and trends. We share a unique identifier, like a user ID or hashed email address, with Google to facilitate the Services. This service may also collect information regarding the use of other websites, apps and online resources. You can learn about Google's practices by going to www.google.com/policies/privacy/partners/, and opt

out of them by downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>.

- **Using Adobe Flash technology (including Flash Local Shared Objects (“Flash LSOs”)) and other similar technologies**
 - We may use Flash LSOs and other technologies to, among other things, collect and store information about your use of the Services. If you do not want Flash LSOs stored on your computer, you can adjust the settings of your Flash player to block Flash LSO storage using the tools contained in the [Website Storage Settings Panel](#). You can also go to the [Global Storage Settings Panel](#) and follow the instructions (which may explain, for example, how to delete existing Flash LSOs (referred to as “information”), how to prevent Flash LSOs from being placed on your computer without your being asked, and how to block Flash LSOs that are not being delivered by the operator of the page you are on at the time). Please note that setting the Flash Player to restrict or limit acceptance of Flash LSOs may reduce or impede the functionality of some Flash applications.
- **IP Address**
 - Your IP address is automatically assigned to your devices by your Internet Service Provider. An IP address may be identified and logged automatically in our server log files whenever a user accesses the Services, along with the time of the visit and the page(s) that were visited. Collecting IP addresses is standard practice and is done automatically by many websites, applications and other services. We use IP addresses for purposes such as calculating usage levels, diagnosing server problems and administering the Services. We may also derive your approximate location from your IP address.
- **Location Data**
 - We automatically collect location data when you visit our online Services. We collect information about your location through GPS, Wi-Fi, wireless network triangulation, or other methods in order to obtain your location. We may also approximate your location by your IP Address. We also use the Google Maps API to gather information about your location. Google uses various technologies to determine your location, including IP address, GPS, and other sensors that may, for example, provide Google with information on nearby devices, Wi-Fi access points, and cell towers (see Google Maps privacy policy to learn more).

Uses and Disclosures of Other Information

We may use and disclose Other Information for any purpose, except where we are required to do otherwise under applicable law. In some instances, we may combine Other Information with Personal Information. If we do, we will treat the combined information as Personal Information as long as it is combined.

SECURITY

We seek to use reasonable organizational, technical and administrative measures to protect Personal Information within our organization. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us in accordance with the “Contacting Us” section below.

CHOICES AND ACCESS

Your choices regarding our use and disclosure of your Personal Information

We give you choices regarding our use and disclosure of your Personal Information for marketing purposes. You may opt-out from:

- **Receiving electronic communications from us:** If you no longer want to receive marketing-related emails from us on a going-forward basis, you may opt-out by using the “Unsubscribe” link contain in the marketing email.
- **Our sharing of your Personal Information with affiliates for their direct marketing purposes:** If you would prefer that we discontinue sharing your Personal Information on a going-forward basis with our affiliates for their direct marketing purposes, you may opt-out of this sharing by sending an email to customersvc@futuclearing.com with the said subject matter.

We will try to comply with your request(s) as soon as reasonably practicable. Please note that if you opt-out of receiving marketing-related emails from us, we may still send you important administrative messages, from which you cannot opt-out.

How you can access or correct your Personal Information

If you would like to request to review or correct Personal Information, you may contact us by:

- Contacting Customer Service at customersvc@futuclearing.com, if you have a brokerage account.
- Going to Settings within the Apps, for information collected through the Apps.

We will respond to your request consistent with applicable law.

For your protection, we may only implement requests with respect to the Personal Information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable.

Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change (e.g.,

when you make a purchase or enter a promotion, you may not be able to change the Personal Information provided until after the completion of such purchase or promotion).

If you are a resident of California, under 18 and a registered user of the Services, you may ask us to remove content or information that you have posted to the Services by writing to customersvc@futuclearing.com. Please note that your request does not ensure complete or comprehensive removal of the content or information, as, for example, some of your content may have been reposted by another user.

THIRD PARTY SERVICES

This Privacy Policy does not address, and we are not responsible for, the privacy, information or other practices of any third parties, including any third party operating any website or service to which the Services link. The inclusion of a link on the Services does not imply endorsement of the linked site or service by us or by our affiliates.

In addition, we are not responsible for the information collection, use, disclosure or security policies or practices of other organizations, such as Facebook, Apple, Google, Microsoft, RIM or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider or device manufacturer, including with respect to any Personal Information you disclose to other organizations through or in connection with the Apps or our Social Media Pages.

THIRD PARTY ADVERTISING

We use third-party advertising companies to serve advertisements regarding goods and services that may be of interest to you when you access and use the Services and other websites or online services, as well as to provide advertising-related services such as reporting, attribution, analytics, and market research.

- You may receive advertisements based on information relating to your access to and use of the Services and other websites or online services on any of your devices, as well as on information received from third parties. These companies place or recognize a unique cookie on your browser (including through the use of pixel tags) that collects information about your use of the Services over time. They also use these technologies, along with information they collect about your online use, to recognize you across the devices you use, such as a mobile phone and a laptop. For advertising, we may share a common account identifier (such as an email address or user ID) or hashed data with our third-party advertising partners to help identify you across devices. If you would like more information about this practice, and to learn how to opt out of it in desktop and mobile browsers on the particular device on which you are accessing this Privacy Policy, please visit <http://optout.aboutads.info/> and <http://optout.networkadvertising.org/>.

USE OF SERVICES BY MINORS

The Services are not directed to individuals under the age of thirteen (13), and we do not knowingly collect Personal Information from individuals under 13.

JURISDICTION AND CROSS-BORDER TRANSFER

Your Personal Information may be stored and processed in any country where we have facilities or in which we engage service providers, and by using the Services you understand that your information will be transferred to countries outside of your country of residence, including the United States, which may have data protection rules that are different from those of your country.

SENSITIVE INFORMATION

Unless we request it, we ask that you not send us, and you not disclose, any sensitive Personal Information (e.g., social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background) on or through the Services or otherwise to us.

UPDATES TO THIS PRIVACY POLICY

The “LAST UPDATED” legend at the top of this Privacy Policy indicates when this Privacy Policy was last revised. Any changes will become effective when we post the revised Privacy Policy on the Services. Your use of the Services following these changes means that you accept the revised Privacy Policy.

CONTACTING US

If you have any questions about this Privacy Policy, please contact us at customersvc@futuclearing.com.

Because email communications are not always secure, please do not include credit card or other sensitive information in your emails to us.