

fivehills™

PRIVACY POLICY.



fivehills™

www.fivehills.com

1ST FLOOR, DEKK HOUSE, ZIPPORA ST, PROVIDENCE INDUSTRIAL ESTATE, MAHE, SEYCHELLES



PRIVACY POLICY

This notice describes the privacy policy of Fivehills Securities Limited, a securities dealer licensed by the Seychelles Financial Services Authority (FSA). We are required, by law, to provide you with this notice, which outlines our business practices to protect your privacy as well as how we collect and share personal information about you. This policy applies to both current and former clients.

We Respect Your Privacy

Fivehills Securities Limited (“Fivehills”) is committed to protecting your privacy. FIVEHILLS relies on access to your personal financial information in order to provide you with relevant information regarding the products and services we offer. We appreciate and understand that the personal financial information you have entrusted to us is sensitive and confidential and we have adopted policies and procedures which assist us in safeguarding the information you provide to us.

Personal information we collect about you

Fivehills collects confidential client information from you in a number of ways including information provided on our new account applications and other forms we receive from you, consumer reporting agencies, information obtained through our website, as well as information obtained from other sources.

For example:

- We collect information such as your name, address, telephone number, email address, social security number, date of birth, net worth, income, financial objectives and investment experience through applications and other forms you submit to us;



- We may access information regarding your account balances, your use of account(s), and the types of products and services you prefer through your interactions and transactions with us;
- We may obtain information about your creditworthiness and credit history from credit reporting agencies;
- We may collect background information from and through third-party vendors to verify representations you have made and to comply with various regulatory requirements.

How we share your personal information

Fivehills is registered as a securities dealer with the FSA. Fivehills has no affiliated companies. Fivehills does not share confidential information about our clients with unaffiliated third parties unless such disclosure is necessary to manage and service your account. For example, we provide access to information about you to unaffiliated third parties in certain limited circumstances, including:

- to help us process transactions for your account(s);
- to help us manage and service your account(s);
- when we contract with third parties to provide account related services such as printing, mailing, and data processing services;
- when we believe that disclosure is required or permitted under law. For example, we may be required to disclose your personal information to cooperate with regulatory or law enforcement authorities, to report tax-related information to federal and state governments, to resolve consumer disputes, to perform credit/authentication checks, or for risk control.

How we protect your confidential personal information about you

We have internal policies and procedures which govern the handling of client information by employees. Third parties who provide account service and support on our behalf may also receive personal information

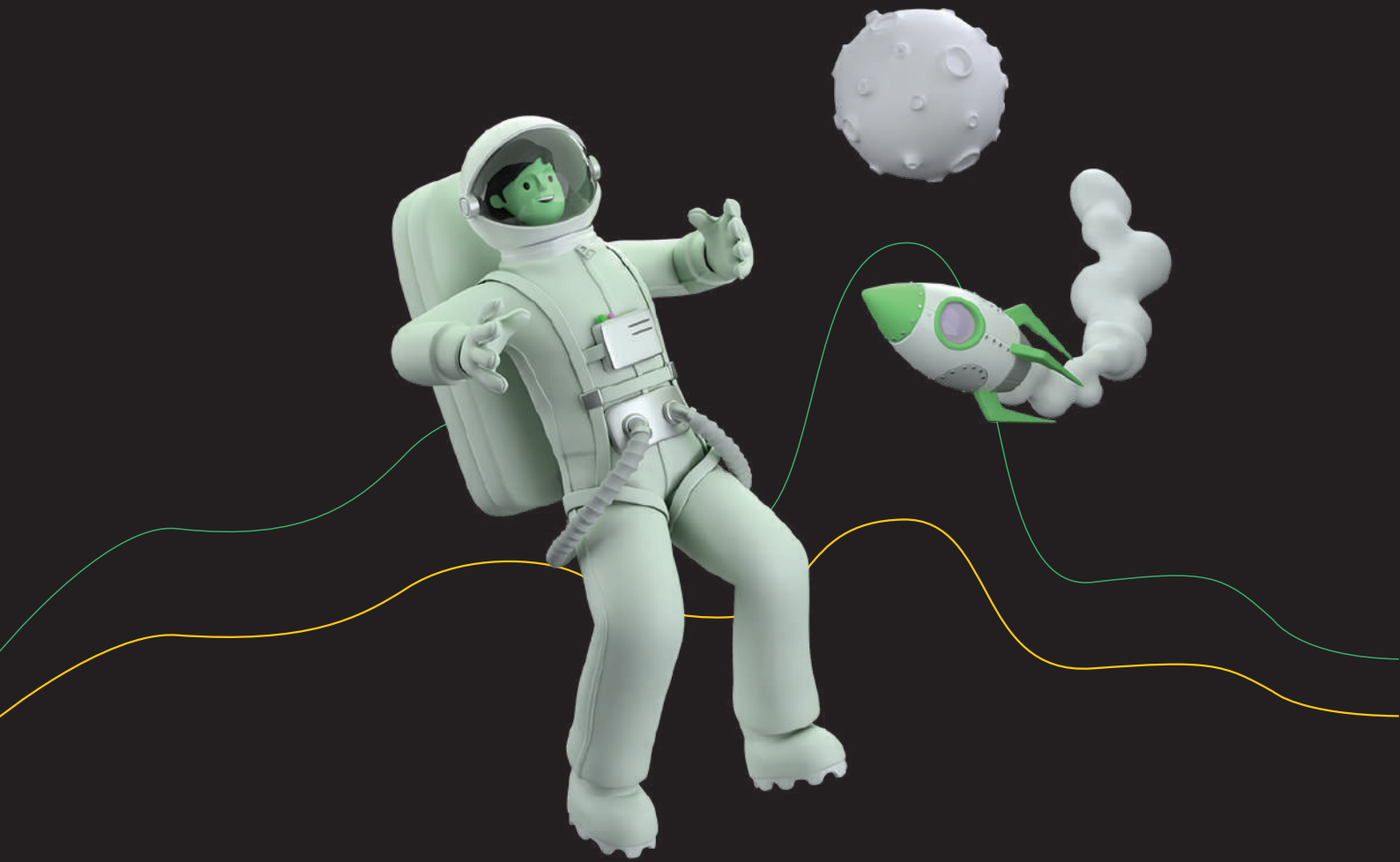


about you, and we require them to adhere to appropriate security standards with respect to such information. Under no circumstances will Fivehills sell confidential client information to anyone, for any reason, at any time.

Contact Us with Questions

If you have any questions or concerns, or if you identify any information that you believe is no longer accurate, you may contact your Fivehills Representative or write to Fivehills, Attn: Compliance Department, 1st Floor, Dekk House, Zippora Street, Providence Industrial Estate, Mahe, Seychelles or by email on Compliance@fivehills.com.

Thank you for your business and allowing us to service your needs.



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