

Privacy Policy

Hitomorrow Securities Ltd (previously T.C.R. International Ltd)
Cyprus Investment Firm · CIF licence no. 237/14 · Reg. No. HE 326383
Version 1.0 · September 2026 · Approved by the Board of Directors

1. Introduction

Hitomorrow Securities Ltd (previously T.C.R. International Ltd) (the “Company”, “we” or “us”) provides this Privacy Policy (the “Policy”) to inform you of our policies and procedures regarding the collection, use and disclosure of the personal information we receive when you visit our website and when you use any part of our services (the “Services”).

The Policy may be amended or updated from time to time. You are advised to consult the Policy regularly for any changes. The Policy is an integral part of the Company’s Terms and Conditions.

Our commitment to you

We respect the confidentiality of the personal information of our former, current and prospective clients, and we are committed to ensuring the security of any information provided to the Company by our former, current and prospective clients, as well as by visitors to our corporate website (together, “you”).

When processing personal data, the Company and its representatives and agents are subject to the provisions of the General Data Protection Regulation (EU) 2016/679 (the “GDPR” or the “Regulation”) and the Cyprus Law 125(I) of 2018. We act as a **data controller** as defined in the GDPR for the purposes of this Policy, which means that we determine, alone or jointly with others, the purposes and means of the processing of personal data.

You are treated as a data subject within the meaning of the GDPR. The use and processing of personal information and data relating to you is strictly limited to the use described in this Policy.

Contact details of the controller

CONTROLLER	Hitomorrow Securities Ltd, Reg. No. HE 326383
REGISTERED OFFICE	Office 202, Athalassis 54, 2nd Floor, Strovolos, 2023 Nicosia, Cyprus

2. Definitions

For the purposes of this Policy:

“personal data” means any information relating to an identified or identifiable natural person (a “data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

“data subject” means any living individual whose personal data is collected, held or processed by us.

“processing” means any operation or set of operations performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

“data controller” means a natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

“data processor” means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

“recipient” means a natural or legal person, public authority, agency or another body to which the personal data are disclosed, whether a third party or not.

“third party” means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and the persons who, under the direct authority of the controller or processor, are authorised to process personal data.

“consent” means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

“genetic data” means personal data relating to the inherited or acquired genetic characteristics of a natural person which give unique information about the physiology or the health of that natural person.

“biometric data” means personal data resulting from specific technical processing relating to the physical, physiological or behavioural characteristics of a natural person, which allow or confirm the unique identification of that natural person, such as facial images or dactyloscopic data.

“data concerning health” means personal data related to the physical or mental health of a natural person, including the provision of health care services, which reveal information about his or her health status.

3. Principles for data processing

In accordance with the GDPR, the Company shall ensure that your personal data is:

1. processed lawfully, fairly and in a transparent manner in relation to individuals (“lawfulness, fairness and transparency”);
2. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes (“purpose limitation”);
3. adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed (“data minimisation”);
4. accurate and, where necessary, kept up to date; every reasonable step shall be taken to ensure that personal data which is inaccurate, having regard to the purposes for which it is processed, is erased or rectified without delay (“accuracy”);
5. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed (“storage limitation”);
6. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures (“integrity and confidentiality”).

The Company shall at all times be able to demonstrate compliance with the above principles (“accountability”).

4. Legal basis for the processing of your personal data

Performance of a contract

The processing of your personal data is necessary for the performance of a contract, namely the agreements for the provision of Services to which you are a party, or in order to take steps at your request prior to entering into an agreement. In order to be able to provide investment and ancillary services to you and to administer our relationship, we need to collect certain personal information.

Compliance with a legal obligation

The processing of your personal data is necessary for compliance with legal obligations arising from a number of laws to which the Company is subject, including the Investment Services and Activities and Regulated Markets Law of 2017, Directive 2014/65/EU (“MiFID II”), the European and Cyprus legislation on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing, the Common Reporting Standard (“CRS”), the Foreign Account Tax Compliance Act (“FATCA”), the Market Abuse Regulation (“MAR”) and the European Market Infrastructure Regulation (“EMIR”). Compliance with these legal obligations requires, among other things, identity verification procedures, anti-money laundering controls, the retention of personal data for a certain period of time and the disclosure of personal data to supervisory and other public authorities.

Legitimate interests

We process a limited amount of technical data relating to the operation and security of our website on the basis of our legitimate interest in the availability and security of our systems.

Consent

Where we rely on your consent, you may withdraw it at any time, without affecting the lawfulness of processing carried out on the basis of consent before its withdrawal.

5. Collection and processing of personal data

For the provision of the Services, during the due diligence and assessment procedure, the appropriateness assessment and for regulatory compliance, we need to collect personal data associated with individuals and legal entities, including but not limited to:

i) Personal information

Full name, date of birth, place of birth, passport and/or identity card number, home and work addresses, contact details (telephone number, email address, fax number), FATCA and CRS information (tax residency, tax identification number), citizenship, nationality, occupation, employment and education history (curriculum vitae or personal profile), and government-issued photographic identification bearing a signature.

ii) Financial information

Current and estimated annual income, net worth, liquid assets, source of funds, investment objectives, bank account details (account name, account number, available balances, transaction history), previous trading experience and risk tolerance.

iii) Legal entities

In the case of a legal entity, the personal data referred to in sections (i) and (ii) will also be collected in respect of the individuals who are directors, secretaries, shareholders, ultimate beneficial owners, controlling persons and authorised representatives.

iv) Trusts

In the case of a trust, in addition to the information referred to in sections (i), (ii) and (iii), personal data will be collected in respect of the individuals who are trustees, settlors and protectors.

We may also collect and process personal data from public sources, such as the Registrar of Companies, commercial registries, the press and the internet, as well as from screening databases.

In addition to the above, we may gather:

- a. certain information about your use of our Services, which may include information from which you can be identified, such as the times you log on, IP address, the type of computer or telecommunications device used to access our corporate website, geographical location, internet access service provider, the volume of use of our

corporate website, the types of data, systems and reports you access, the duration of sessions and other similar data. This data is collected automatically by the IT infrastructure of the Company;

- b. personal information relating to an individual visitor to our corporate website submitted through any contact facility on the website.

Our corporate website does not set cookies and does not use analytics, tracking or profiling technologies.

The Company shall **not** collect from you any special categories of personal data, namely:

- data revealing racial or ethnic origin;
- data revealing political opinions;
- data revealing religious or philosophical beliefs;
- data revealing trade union membership;
- genetic data;
- biometric data processed for the purpose of uniquely identifying a natural person;
- data concerning health;
- data concerning a natural person's sex life or sexual orientation.

6. Your obligation to provide us with your personal data

The provision of your personal data is a requirement necessary in order to enter into a contract with the Company. From time to time we may ask you to confirm the accuracy of your personal data. Failure to provide us with up to date and accurate personal data will not allow us to commence or continue our business relationship, or to execute an occasional transaction, as compliance with our legal obligations would be impossible.

Where a business relationship is not completed within six (6) months from the date of last communication, your personal data will be destroyed without further notice.

7. Marketing

Where you have consented, we may process your personal data for marketing purposes, in the following ways:

- we may contact you in order to present services to which you do not subscribe and which may be of interest to you according to your profile;
- we may provide you with information about features of our website that we think may be of interest to you;
- we may invite you to client functions or events.

Such contact may be made by email, post or telephone. You may withdraw your consent, or object to processing for direct marketing purposes, at any time and free of charge, by contacting compliance@hi2morrowsecurities.com.

8. Recipients or categories of recipients of your personal data

In the course of the performance of our contractual and statutory obligations, and for legitimate business purposes, your personal data may be disclosed to:

- a. auditors, lawyers, consultants, administrators, subcontractors and other external professional advisers of the Company, subject to confidentiality agreements;
- b. third-party processors, such as payment services providers and companies that assist us in the provision of Services by offering technological expertise, solutions and support, bound by contract to comply with the provisions of the GDPR;
- c. licensors of the software used on our corporate website;
- d. public authorities, for example the Cyprus Securities and Exchange Commission, the Unit for Combating Money Laundering (MOKAS), the Central Bank of Cyprus, tax authorities and other supervisory bodies, where required by applicable laws and regulations or upon request.

Public authorities to which personal data is disclosed in accordance with a legal obligation for the exercise of their official mission are not regarded as recipients where they receive personal data necessary to carry out a particular inquiry in the general interest in accordance with Union or Cyprus law.

Transfers to third countries

Where we transfer your personal data to third countries, we do so on the basis of the standard contractual clauses adopted by the European Commission, or to countries and international organisations that provide an adequate level of protection on the basis of a European Commission adequacy decision.

9. Period for which your personal data will be stored

We will keep your personal data for the duration of our business relationship and for five (5) years after the termination of that relationship, or after the date of an occasional transaction, unless otherwise required by a competent authority, in line with the provisions of the applicable European and Cyprus legislation on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing, MiFID II and the Investment Services and Activities and Regulated Markets Law of the Republic of Cyprus.

We may keep your data for longer where we cannot delete it for legal or regulatory reasons. In particular, the retention of data is not limited in time in the case of pending legal proceedings or an investigation initiated by a public authority, provided that in each case the Company has been informed of those proceedings or that investigation within the retention period described above.

10. Automated decision-making

The Company does not take decisions based solely on automated processing, including profiling, which produce legal effects concerning you or similarly significantly affect you.

11. Your rights

You have the following rights in relation to the personal data we control and process:

1. The right of access

The right to request access to, or copies of, your personal data, together with information regarding the processing of that personal data.

2. The right to rectification

If you discover that the information we hold about you is inaccurate or incomplete, you may request that it be updated.

3. The right to erasure (the right to be forgotten)

You may request that we erase your data in certain circumstances, such as where the data is no longer necessary, where it was unlawfully processed, or where it no longer meets the lawful ground for which it was collected, including where your consent is withdrawn.

4. The right to restrict processing

You may request that we limit the way we use your personal data. This is an alternative to requesting the erasure of data, and may be used where you contest the accuracy of your personal data, or where you no longer need the information but we require it to establish, exercise or defend a legal claim.

5. The right to data portability

You are permitted to obtain and reuse your personal data for your own purposes across different services. This right applies only to personal data that you have provided to us on the basis of a contract or of consent.

6. The right to object

You may object to the processing of personal data carried out on the grounds of legitimate interests or the performance of a task carried out in the public interest or in the exercise of official authority. We will stop processing the information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or unless the processing is for the establishment, exercise or defence of legal claims.

7. The right to withdraw consent

You have the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

8. The right to lodge a complaint with a supervisory authority

Before lodging a complaint with a supervisory authority, you may address your concerns regarding any issue concerning the processing of your personal data, and exercise your rights, by contacting us at **compliance@hi2morrowsecurities.com**.

If your concerns are not addressed, you may lodge a complaint with the Office of the Commissioner for Personal Data Protection of the Republic of Cyprus. To do so, please visit the Commissioner's website at www.dataprotection.gov.cy, section "Lodge a complaint".

12. How we protect your personal data

We will ensure that your information is secure and that we have appropriate safeguards in place to protect it at all times. We have implemented appropriate technical and organisational measures, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, in order to ensure a level of security appropriate to the risk.

All electronic information you provide to us is stored on secure and protected servers. The transmission of information via the internet is secured using Transport Layer Security. We have also put in place internal security procedures and a Business Continuity Plan. Once we have received your information, we follow these procedures and security measures in order to prevent unauthorised access.

13. Changes to this Policy

We reserve the right to change this Policy from time to time, and will update this document accordingly. Please review this Policy regularly; your continued use of the website will signify that you are aware of any such changes.

The website may from time to time contain links to and from other websites. If you follow a link to any such website, please note that those websites may have their own privacy policies, and that we do not accept any responsibility or liability for those policies or for the content of external websites operated by legally and economically independent entities. Please review their policies before you submit any personal data to those websites.

14. Data protection contact

For any further information on the protection of your personal data which you submit to us for the use of the Services, or if you wish to exercise any of the rights described in this Policy, please submit your request to **compliance@hi2morrowsecurities.com**, or in writing to the Compliance Officer at the registered office of the Company.