

Esperanza Fintech (Commodities) Limited, Esperanza Fintech (Nominees) Limited, Espetopia Limited and their respective affiliates (collectively, the “**Esperanza Group**”) pledge to comply with the applicable laws and regulations relating to the privacy, confidentiality and security of personal data, including without limitation the Personal Data (Privacy) Ordinance of Hong Kong. This document (“**Policy**”) sets out the Esperanza Group’s privacy policies and practices in relation to the personal data it handles.

You should read this Policy carefully, so as to ensure that you fully understand how the Esperanza Group will handle your personal data when you use its products and services (“**Products and Services**”) or access its websites and platforms (“**Platforms**”). Your use of the Products and Services or the Platforms constitutes your acceptance of the terms of this Policy.

The Esperanza Group may from time to time amend, vary or add to this Policy without any prior notice to you. Please check the Platforms regularly for the latest version of this Policy. If you continue to use the Products and Services or the Platforms after the amendment / variation of this Policy, you are deemed to have accepted the relevant amendment / variation.

1. Collection of Personal Data

1.1. The Esperanza Group collects certain personal data from you when you use the Products and Services or the Platforms. The types of personal data which may be collected include:

- (a) Personal identifiers such as name, gender, age and nationality, ID / passport number;
- (b) Contact details such as address, email address, telephone number and fax number; and
- (c) Source of wealth and tax residency.

1.2. It is mandatory for you to provide the above personal data to the Esperanza Group in order for you to use the Products and Services and the Platforms. If you refuse or fail to provide the above personal data, the Esperanza Group may be unable to provide the Products and Services to you and you may not be able to use all the functions of the Platforms.

1.3. We may collect personal data about you from third parties, including identity verification services, fraud prevention agencies, and public sources, for the purposes of complying with our legal obligations (such as Know-Your-Customer and anti-money laundering requirements).

2. Use of Personal Data

2.1. You agree that your personal data provided to the Esperanza Group may be used and retained by the Esperanza Group for the following purposes and for other purposes as may be notified to or agreed by you or required by applicable laws, rules or regulations from time to time:

- (a) to provide you with the Products and Services;
- (b) to operate or improve the Platforms and to allow you to use the functions thereof;
- (c) to entrust the operation of the Platforms to a third party or for their provision of the Products and Services;
- (d) to conduct surveys in relation to the Products and Services and the Platforms;
- (e) to improve the Products and Services and to develop new products and services;
- (f) to contact you;
- (g) to verify your identity and to take other relevant actions upon receiving an inquiry from you;
- (h) to collect statistical data in relation to the use of the Products and Services and the Platforms;
- (i) to prevent any use of the Products and Services or the Platforms in a manner which violates this Policy, or any other agreement between the Esperanza Group and you;; and

- (j) to fulfil any other purposes directly relating to any of the above purposes.

2.2. The Esperanza Group reserves the right to use the personal data you provide for statistical and data analysis. The Esperanza Group is the owner and proprietor of the results generated from such statistical and data analysis and reserves the right to use and publish the same.

2.3. The Esperanza Group will not use your personal data for direct marketing purposes, unless your prior consent has been obtained.

3. Retention of Personal Data

3.1. The Esperanza Group will retain your personal data only for so long as is necessary for fulfilling the specific purposes for which they were collected or for purposes directly related to those specific purposes. After that, your personal data will be erased.

4. Security of Personal Data

4.1. The Esperanza Group endeavours to protect the confidentiality of personal data stored in its system but it does not give any warranties or representations of the safety and security of data transmission. In the event that you become aware of any unauthorised disclosure of your personal data, please contact the Esperanza Group immediately.

4.2. The Esperanza Group reserves the right to take all actions in securing the safety and integrity of personal data held by the Esperanza Group as it deems appropriate, including without limitation monitoring and recording internet activities and internet protocol addresses, verifying user information, and tracing and tracking information flow.

4.3. In the event of a data breach which is likely to result in a real risk of significant harm to you, we will, where appropriate and in accordance with applicable legal requirements or guidelines, notify you and the relevant regulatory authorities (including the Privacy Commissioner for Personal Data).

5. Transfer of Personal Data

5.1. In order to provide the Products and Services to you, the Esperanza Group may be required to transfer your personal data to the following persons:

- (a) affiliates of the Esperanza Group, for the purposes of providing and enhancing the Products and Services and the Platforms;
- (b) Esperanza Group’s service providers (which may include hosting service providers, platform development, support and security service providers, analytics tool and service providers, marketing service providers, customer support service providers and payment and reconciliation service providers) for the purposes of providing and enhancing the Products and Services and the Platforms;
- (c) third parties or relevant governmental bodies, courts or bodies of similar nature, for the purposes of complying with applicable laws, enforcing or investigating potential violations of our terms of use or any other contract between you and us, or protecting our rights, property or safety or that of our customers, employees, and other third parties;
- (d) third parties in relation to reorganization of the Esperanza Group, in particular a third party that acquires (or proposes to acquire) ownership or control of our assets, shares or management, or that of our affiliates by any means, or a third party from whom we acquire ownership or control of assets, shares or management.

5.2. If the Esperanza Group engages a data processor to process personal data on its behalf, the Esperanza Group will adopt contractual or other means to ensure the personal data is kept for no longer than is necessary for such processing and to prevent unauthorized or accidental access, processing, erasure, loss or use of the data transferred to the data processor for processing.

5.3. The Esperanza Group will only transfer your personal data for direct marketing purposes if your prior consent has been obtained.

6. Third-Party Websites

The Platforms may contain links to websites of third parties and the Esperanza Group may not be related to those third-party websites. The Esperanza Group does not accept responsibility for the products or services or acts in connection with such third-party websites. Moreover, such third-party websites may have their own set of privacy policies and practices and this Policy does not cover such third-party websites. The Esperanza Group accepts no responsibility for any security, confidentiality and data protection issues arising from any personal data you provide to those third-party websites.

7. Use of Cookies and Tracking Tools

- 7.1. In order to ensure that the Platforms work properly, and to provide you with a personalised experience, the Esperanza Group and certain of its third-party service providers may set cookies or similar technologies (such as web beacons, pixels and advertising identifiers) on your device, subject to your consent where relevant. A cookie is a small text file that a website saves on your device when you visit the website or platform. It enables the website or platform to remember your actions and preferences (such as session status, language, font size and other display preferences) over a period of time, so you do not have to keep re-entering them whenever you come back to the site or browse from one page to another.
- 7.2. In many cases, the default settings of the browsing software enable cookie storage on the user's end device. You can delete or block cookies from being set in your browser settings or relevant software. Certain parts of the Platform may not work properly if cookies are blocked or deleted.
- 7.3. The types of cookies and the purposes for which they are used on the Platform include without limitation:
- (a) strictly necessary cookies, which enable the use of the services available on the Platforms, for example cookies used for authentication of users and cookies that ensure security;
 - (b) performance cookies, which help us collect information about how the Platforms are used, so that we can perform analytics and improve their performance;
 - (c) functionality cookies, which remember choices made by the user and personalise the interface and allow enhanced functionality and personalisation of the Platforms; and
 - (d) targeting cookies and advertising IDs for delivering advertisements more relevant to users and their interests, as well as ad conversion tracking, which are mainly set by the advertising partners.

8. Access to and Correction of Personal Data

- 8.1. You are entitled to check whether the Esperanza Group holds personal data about you and to have access to those data. If any of these data are incorrect or inaccurate, you have the right to request the correction thereof.
- 8.2. Requests for access to or to correct personal data should be addressed to Compliance Officer at compliance@espefintech.com. The Esperanza Group is entitled to charge a reasonable fee for processing any data access or correction requests.

Date: 5 May 2026