



AXYS STOCKBROKING LTD

Introduction

At AXYS Stockbroking Ltd, the safety and security of your privacy and personal information is crucial and essential to the long-term success of our business. To formalize our conduct governing the collection, use and disclosure of our clients' personal information, we have adopted this policy.

Definitions

ASL: means AXYS Stockbroking Ltd

Personal information: means any information that can be used to identify you as an individual, including your name, age, address, personal, financial and other details and any other identifying information about you that you provide us when you apply for or when we enter into an agreement to provide you with investment management services.

We, our, us: means ASL

Application

This policy applies to the operations of ASL including the investment advisory operations and to all of the services and products we offer our clients.

Accountability

At ASL, we are dedicated to ensuring our Clients confidentiality by protecting the personal, business and financial information entrusted to us.

All our employees are responsible for maintaining our Clients' privacy. The Managing Director together with the Compliance Officer must ensure that our employees comply with this policy. They are available to answer any of our Clients' specific or general questions regarding this policy.

We do not sell or distribute our clients' information to third parties for marketing or soliciting any products or services, unless we have our Clients' permission or are required by law to do so. We may use our Clients' personal information to send promotional information about third parties which we think our Clients may find interesting, unless our Clients tell us otherwise.

Required Information

We ask our Clients for information to: (a) establish and maintain responsible commercial relations with clients; (b) to provide ongoing service; and (c) meet our legal and regulatory requirements.

At the start of and during the course of our relationship, we collect information about our Clients. Some of the information we collect is from our managed account agreement or investment management agreement with our Clients. Such information includes:

- To respond to valid and authorized information request;
- As permitted or required by law;
- To help prevent crime, fraud, money laundering and terrorist financing;
- To protect the safety of employees, clients or other third parties; or
- In situations where we have your consent.

When we provide information in response to a legal inquiry or order that we believe to be valid, we disclose only the information that is legally required.

Safeguard of Information

We make reasonable efforts to ensure the information we have about our Clients is accurate, up-to date and complete. Given that we make decisions based on the information we have; we encourage our Clients to help us keep your information up to date.



Having accurate information about our Clients enables us to give a better service and minimizes the possibility that out-of-date information may be used to make a decision which impacts them. We have procedures and practices in place to help us maintain the accuracy of the information and we rely on our Clients for such information. Our Clients can help by keeping us informed of any changes such as a change of address or phone number.

We retain our Clients' information only for the time it is required and for the purposes of providing them with our services. This period of time extends beyond the end of our relationship but only for as long as is necessary for us to meet our legal and regulatory requirements and for as long as it is necessary for us to respond to any outstanding matters. When our Clients' information is no longer needed, they can ask to retrieve all files from us.

All our employees are familiar with the procedures required to safeguard client information, and they are required to maintain the confidentiality of such information at all times, failing to do so will result in appropriate disciplinary measures. Protecting our Clients' information is an essential part of our job. In order to protect the information only authorized employees have access to it and all employees sign a confidentiality agreement when hired. At ASL we also have a 'clean desk policy'.

Access to your information

If a Client would like to verify the accuracy of his personal information or receive a copy of this policy, he will need to submit a request to stockbroking@axys-group.com. Upon such request, we will give the Client access to the information.

The Clients are always in control of their personal information. Providing us with information is always the Client's choice. By establishing an account with us, the Clients have consented to the disclosure of their personal information to a third party in the circumstances or for the purposes described in this policy. The Client's decision to withhold information or withdraw consent with respect to our use of his personal information may prevent us from taking him as a client or continuing to work with him as a client. The Client can withdraw his consent at any time, subject to the requirement of reasonable notice and any legal or contractual restrictions, by writing to us.

Client concerns

If the Client has any questions or concerns about privacy, this policy or his personal information, we encourage him to let us know.