

Privacy Policy

Last Updated: December 2025

1. Introduction

ATGFS HK Limited ("ATGFS", "we," "our," or "us") is committed to protecting the privacy and security of our clients, partners, and website visitors. This Privacy Policy explains how we collect, use, disclose, process, and safeguard your information when you access our websites, client portals, applications, communication channels, and related services.

ATGFS may provide client relationship management, administrative support, technology services, payment facilitation, operational support, and related business services to affiliated companies, service providers, liquidity providers, financial institutions, and regulated entities within its corporate group.

By using our services, you acknowledge that you have read, understood, and agreed to the practices described in this Privacy Policy.

2. Information We Collect

We may collect the following categories of information:

Personal Information

- Full name
- Email address
- Telephone number
- Company name
- Business address
- Account credentials
- Government-issued identification documents (where required)
- Compliance and verification information

Financial and Trading Information

- Account balances
- Transaction history

- Trading activity
- Deposit and withdrawal records
- Risk profile and suitability information

Technical Information

- IP address
 - Browser type and version
 - Device information
 - Operating system
 - Login timestamps
 - Access logs
 - Cookies and similar technologies
-

3. How We Use Your Information

We use collected information to:

- Provide and maintain our services
 - Process account registrations and applications
 - Verify identity and conduct compliance checks
 - Manage client accounts
 - Process transactions and payments
 - Respond to inquiries and support requests
 - Enhance security and prevent unauthorized access
 - Monitor platform performance and usage
 - Meet legal and regulatory obligations
 - Communicate service updates, maintenance notices, and important account information
-

4. Legal Basis for Processing

Where applicable, we process personal information based on:

- Performance of a contract
 - Compliance with legal obligations
 - Legitimate business interests
 - User consent where required by law
-

5. Information Sharing and Disclosure

We do not sell personal information.

We may share, transfer, or disclose information to:

- Affiliated companies and entities within our corporate group;
- Financial institutions, banking partners, payment service providers, and settlement agents;
- Liquidity providers, execution venues, counterparties, brokers, custodians, or service providers involved in providing financial services;
- Technology vendors, cloud hosting providers, and operational service providers;
- Regulatory authorities, governmental agencies, courts, tribunals, and law enforcement authorities;
- Professional advisers, auditors, consultants, compliance specialists, and legal counsel.

Where necessary to provide services, administer accounts, facilitate transactions, investigate complaints, comply with legal obligations, or protect legitimate business interests, personal information may be transferred between ATGFS and affiliated entities operating in different jurisdictions

Information may also be disclosed where required by law, regulation, court order, regulatory inquiry, or lawful governmental request.

6. Data Security

We implement reasonable administrative, technical, and physical safeguards designed to protect personal information against unauthorized access, alteration, disclosure, or destruction.

Security measures may include:

- Encryption of data in transit
- Secure authentication controls
- Access management procedures
- Network monitoring and logging
- Regular security assessments

Despite our efforts, no method of electronic transmission or storage is completely secure.

7. Data Retention

We retain personal information only for as long as necessary to:

- Provide services
- Fulfill contractual obligations
- Comply with legal and regulatory requirements
- Resolve disputes
- Enforce agreements

Retention periods may vary depending on applicable laws and business requirements.

8. Cookies and Tracking Technologies

Our websites and portals may use cookies and similar technologies to:

- Maintain user sessions
- Improve functionality and performance
- Analyze website usage
- Enhance user experience

Users may manage cookie preferences through their browser settings. Disabling cookies may affect certain website features.

9. International Data Transfers

Information may be stored and processed in jurisdictions outside your country of residence. We take reasonable steps to ensure that appropriate safeguards are in place for cross-border data transfers.

10. Your Rights

Subject to applicable laws, you may have the right to:

- Access your personal information
- Request correction of inaccurate information
- Request deletion of information where permitted
- Object to certain processing activities
- Request restriction of processing
- Request data portability

- Withdraw consent where processing is based on consent

Requests may be subject to identity verification and legal limitations.

11. Third-Party Services

Our websites or services may contain links to third-party websites, platforms, or services. We are not responsible for the privacy practices or content of third-party providers.

Users should review the privacy policies of any third-party services they access.

12. Children's Privacy

Our services are intended for business and institutional use and are not directed toward individuals under the age of 18. We do not knowingly collect personal information from minors.

13. Changes to This Privacy Policy

We reserve the right to update or modify this Privacy Policy at any time. Any changes will be posted on this page with an updated revision date.

Continued use of our services following the publication of changes constitutes acceptance of the revised Privacy Policy.

14. Contact Information

For privacy-related inquiries, requests, or concerns, please contact:

ATGFS | NEXUS™

Email: riskdep.mgmt@atgfs-hk.com

Please note that certain support mailboxes may be automated and unmonitored. Users should contact their designated relationship manager or the authorized support channel, where applicable.