



Privacy Policy

隐私政策

Sunflower Trading Ltd



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1. Introduction 简介

Sunflower Trading Ltd is a company incorporated and registered in UNITED KINGDOM under registration No.10719569 having its registered address situated at 27, Old Gloucester Street, LONDON, WC1N 3AX, UNITED KINGDOM (hereinafter, the “Company”). Sunflower Trading Ltd,一家在英国注册成立的公司，其注册编号为 10719569，注册地址位于 27, Old Gloucester Street, LONDON, WC1N 3AX, UNITED KINGDOM.（以下简称“公司”）。

The Company is an investment firm operating as an international foreign exchange broker under the provision of the applicable law. 公司是根据适用法律的规定成立的一家投资公司，作为国际外汇券商经营业务。

2. General 通则

The Company commits not to disclose to a third party, any of its Clients’ confidential information unless required to do so by any authority of a competent jurisdiction; such disclosure shall occur on a ‘need-to-know’ basis, unless otherwise instructed by such an authority. Under such circumstances, the Company shall expressly inform the third party regarding the confidential nature of the information. 公司承诺不向第三方披露其客户的机密信息，除非有合法管辖权的任何当局要求披露。此等披露必须是在“须知”的基础上，除非该当局另有指示。在这种情况下，公司应明确告知第三方该信息的机密性质。

Any personal information is treated as confidential and may be shared only within the Company, by its employees and affiliates for business purposes, as permitted by the applicable law. The information may be disclosed to third parties, such as the Company Partners and Affiliates for business purposes only, such as, but not limited to, servicing Client accounts and informing Clients about new products and services. The Company Partners, Affiliates, and Business Introducers maintain the privacy of Client’s information to the same extent the Company does in accordance with the policy. Information may also be provided to non-affiliated companies, providing professional, legal, and accounting services. Non-affiliated companies that assist the Company in providing services to the Client are required to maintain the confidentiality of such information and to use Client’s personal information only in the course of providing such services, for the purposes that the Company dictates and within the ambit of the applicable law. 任何个人信息均作为机密信息对待，只在公司内部由公司员工和关联公司为了业务目的在适用法律允许的范围内共享。仅在围绕商业目的，例如但不限于服务客户账户和通知客户新产品和服务等商业目的的情况下，方可向公司合作伙伴、关联公司等第三方披露信息。公司的合作伙伴、关联公司和业务介绍人应采用公司按照本政策对客户信息进行保密的同等程度维持客户信息的私密性。同时，该信息也可提供给专业、法律和会计服务的非关联公司。此等非关联公司是指协助公司向客户提供服务的公司，其必须对此等信息保密，并只在提供此等服务的过程中仅仅为了公司规定的目的在适用法律的范围内使用客户的个人信息。

The Company will not sell or give away Client’s name, mailing address, phone number, email address or any other information to anyone. The Company will use various security measures to protect Client’s information from unauthorised users. 公司不会向任何人出售或赠送客户的姓名、邮寄地址、电话号码、电子邮件地址或任何其他信息。公司将采用各种安全措施来保护客户信息，防止未经授权的用户使用客户信息。



The policy sets out the procedures and methods used by the Company to collect, use and manage personal information from its visitors, potential and active clients through the Company's website. 本政策规定了公司通过公司网站收集、使用和管理网站访客、潜在和活跃客户的个人信息所采用的程序和方法。

The policy forms part of the Client's agreement, namely, the Client Agreement with the Company, thus the Client is also bound by the terms of this policy, as set out herein. 本政策构成客户协议（即与公司签订的“客户协议”）的组成部分，因此，客户也应遵守下文规定的本协议的条款。

3. Personal Information 个人信息

In order to receive more information, register for a demo account, open a trading account with the Company or for any other business relationship, the Client is requested to complete an application form, accessible via the Company's website. 为了得到在公司注册模拟账户、开设交易账户或建立任何其他业务关系的更多信息，客户需要填妥通过公司网站获得的申请表。

The Clients, by completing the application form and providing their personal information, enable the Company to evaluate the application. 客户填妥的申请表和提供的个人信息使公司能够评估其申请。

The personal Data collected by the Company may include, but shall not limited to: 公司收集的个人资料可能包括但不限于：

- a. Clients' personal information such as name, address, date of birth, social security number and occupation; 客户的个人信息，如姓名、地址、出生日期、社保编号、职业等；
- b. Financial information such as income, assets, financial investment experience; 财务信息，如收入、资产、金融投资经历等；
- c. Documents provided by the Clients which enable the Company to verify Clients' identity, such as passport copy, utility bill, bank statements or in certain situations Clients' company's relevant incorporation documents. 客户提交的使公司能够核实客户身份的资料，如护照副本、水电费账单、银行对账单，或者在某些情况下，客户公司的相关注册文件等。

The Company is obliged to keep the Clients' personal data on record for a period of five (5) years which are calculated after the execution of the transactions or the termination of the business relationship between the Company and the Client. 公司有义务将客户的个人资料记录在案并保留五（5）年，自交易执行后或者公司和客户之间的业务关系终止之后开始计算。

4. General Requirements for Data Processing 数据处理的通用要求

- a. Data processing means collection, recording, arrangement, storage, alteration, disclosing, consultation, extraction, use, transmission, cross-use transferring or granting access to third parties, interconnecting, closure, deletion or destruction of data, or several of the aforementioned operations, regardless of the manner in which they are performed or the means used; 数据处理是指收集、记录、整理、存储、变更、披露、咨询、提取、使



- 用、传送、交叉使用传递或授权第三方访问、互连、终止、删除或销毁数据或实施其中几个上述操作，而不管实施方式或采用的方法；
- b. The Company shall compile a list and documentation of means used in data processing and shall keep records of data processing. The list of means used in data processing shall include the name, type and number of the equipment and the name of the manufacturer of the equipment; the name and number of the licence of the software used and the name of the software manufacturer; the location of the documentation of the software used; 公司应将数据处理采用的方法编成列表和文档，并保留数据处理的记录。数据处理采用方法的清单应包括设备名称、类型和数量以及设备制造商的名称；所用软件的名称和许可证编号以及软件制造商的名称；所用软件的文档位置；
- c. Persons engaged in the processing of data shall process data only for authorised purposes under the established conditions and according to the instructions and orders received, and they shall maintain the confidentiality of data which has become known to them in the course of performance of their duties and which are not intended for public use. Such confidentiality requirement continues after termination of the employment or service relationship with the Company; 从事数据处理的人员应在既定的条件下并根据收到的指令和订单仅仅出于授权目的处理数据。在履行职责的过程中，此等人员应保证自己接触到的数据的机密性，而不将其用于公共用途。在与公司终止雇佣关系或服务关系之后，此等保密要求继续有效；
- d. Unauthorised processing of data (including recording, alteration, deletion, reading, copying, (transmission), unauthorised transportation of records and any other unauthorised use of data (not prescribed by official duties) shall be prohibited; 严禁未经授权的处理数据（包括记录、变更、删除、阅读、复制（传送）、未经授权的迁移数据和任何其他未经授权的使用数据（公务职责中未规定的））；
- e. The Company shall implement adequate and sufficient measures to ensure that every data processing operation leaves a trace, which would afterwards enable identification of the person who performed the operation, the nature and time of the operation and any other relevant facts, including when, by whom and which data were recorded, altered or deleted, or when, by whom and which data in the data processing system were accessed, as well as information on any transmissions of data. A possibility for restoring the content of data before modifications shall be available when any modifications are made in data or documents; 公司应实施适当和充分的措施，以确保各数据处理操作均有迹可循，使得之后能够确定执行操作的人员、操作的性质和时间以及任何其他相关事实，包括记录、修改或删除了任何数据的时间、人物或者访问了系统处理数据中任何数据的人物以及有关传输任何数据的相关信息。在修改数据或文档的情况下，应有可能恢复修改之前的资料内容；
- f. Every user of database shall be issued personal means of authentication, enabling them to use the database. The access password for electronic databases shall be changed at least once a quarter. The use of any means of automatic entry of passwords shall be prohibited. A user of the data processing system shall not have access to data, which are not required for authorised data processing and the performance of duties of that particular user; 向使用数据库的每名用户分配个人身份验证方式，使其能够使用数据库。访问电子数据库的密码应至少每季度更改一次。严禁使用任何方式的自动输入密码。数据处理系统的用户不得访问执行授权数据处理和履行职责不需要访问的数据；
- g. Adequate security measures, including encryption of data if necessary, shall be implemented upon transmission of data by means of data communication equipment or in



- the transport of records; 在使用数据通信设备传送数据的情况下或在运输记录的过程中，应实施充足的安全措施，包括数据加密等（如有必要）；
- h. The manager or an employee of the Company shall rely on justified expectation that data submitted by persons who submit data are correct. The manager or an employee of the Company shall, from time to time, verify the accuracy of data in the database(s) by requesting the data subject to check the data and, if necessary, make corrections or confirm the accuracy of data; 公司的经理或员工依靠合理预期，确保由数据提交人员提交的数据是正确的。公司的经理或员工应随时要求资料主体检查数据，并在必要时，改正数据或确认数据的准确性，从而证实数据库中的数据准确性；
 - i. Any incomplete or incorrect data known to the manager or an employee of the Company shall be closed and any necessary measures shall be taken promptly to supplement and correct the data in question. Upon a request of a data subject, the manager or an employee of the Company shall correct any incorrect data on the data subject in the database if the data subject notifies the manager or employee of the Company of the inaccuracy of the data on the data subject and submits correct data; the incorrect data shall be stored with the correct data and with a note indicating in which period the incorrect data were used; 如果公司的经理或员工得知任何数据不完整或不正确，应关闭该不完整或不正确的数据，并及时采取任何必要的措施来补充和更正有问题的数据；如果数据主体通知了公司的经理或员工数据主体相关的数据不正确，并提交了正确的数据，经数据主体要求，公司的经理或员工应更正数据库中数据主体相关的不正确数据，并将正确的数据与错误的数​​据一同存储，附注说明使用错误数据的时段；
 - j. If the accuracy of data is in dispute, the data in questions shall be closed until confirmation of accuracy of the data or determination of correct data. Third persons who provided or received the data shall be promptly notified of any corrections made in data if it is technically feasible and does not lead to disproportionate expenses; 如果数据的准确性存在争议，则在确认数据的准确性或确定正确的数据之前，停止使用有争议的数据。在技术上可行且不会产生不成比例的开支的情况下，及时通知提供或收到数据的其他人有关数据的任何更正；
 - k. Automatic decisions of the data processing system, without participation of the data subject, shall be permitted only on the conditions and pursuant to procedures specified by the applicable law. 数据处理系统自主决策而无需数据主体参与的功能应只在适用法律允许的条件下按照适用法律规定的程序进行。

5. Rights of the Data subject 数据主体的权利

- a. The data subject shall have the right to withdraw at any time the consent for the processing of personal data, in which case the Company shall cease processing the data to the corresponding extent; 数据主体有权随时撤回同意公司进行个人数据处理，在这种情况下，公司应在相应的范围内停止数据处理；
- b. Every person has the right to access data concerning themselves, which are collected in databases, unless this right is restricted by the applicable law. Decisions on granting or withholding authorisations for access to data and issuing copies of data shall be made by the executive manager of the Company; 每个人均有权访问数据库收集的与自己有关的数据，除非适用法律限制该权利。授权对数据的访问或取消授权及发行数据拷贝由公司的执行经理决定；
- c. Upon request of the data subject, the Company shall notify the data subject of the data, which is available on the data subject in the database, and the sources of such data, the



purpose of data processing and any third parties or categories of third parties that have receive authorisation for data transmission, as well as any other facts of which the owner (processor) of the database is required to notify the data subject, unless the right of the data subject to receive information is restricted by the applicable law. The data shall be issued by using the method requested by the data subject, if possible, within five (5) business days from the receipt of the respective request; 经数据主体要求，公司应告知数据主体数据库中可用的数据主体有关的数据、此等数据的来源、数据处理的目的、获得数据传送授权的任何第三方或第三方类别以及数据库所有者（处理者）需通知数据主体的任何其他情况，除非数据主体收到此等信息的权利遭到适用法律的限制。采用数据主体请求的方式发布数据，如果可能，应在收到各自请求后对应的五（5）个工作日内发布；

- d. In the cases specified by the applicable law, data shall be released to third parties with a statutory right to request and receive such data. In all other cases, data shall be released to third parties only if the data subject has granted a respective consent; 在适用法律规定的情况下，应向拥有法定权利索取和接收此等数据的第三方发布数据。在所有其他情况下，只有分别征得数据主体同意的前提下，方可向第三方发布数据；
- e. Authorised persons may review, on site in the Company, the documents on the establishment of databases and any other documents pertaining to the databases. 授权人员可在公司现场审查有关数据库建立的文档和数据库相关的任何其他文档。

6. Data collected in databases 数据库中收集的数据

- a. The Company may collect in databases any publicly available data or any data voluntarily submitted by data subjects. Only data necessary for the provision of service to the clients and/or for the performance of operations requested by the clients may be requested from the clients; 公司可将任何公开的可用数据或数据主体自愿提交的任何数据收集到数据库中。只有向客户提供服务和/或执行客户要求的操作所需数据方可向客户索取；
- b. The Company shall collect and process the Clients' data to the extent, which is necessary for the achievement of specified objectives (provision of services), and in a manner, which is designed for the specific purpose. Unnecessary data shall be deleted or destroyed at once. Use of data in any other manner than previously agreed is permitted only with a respective consent of the data subject or on the conditions specified by the applicable law; 公司应在实现指定目标（提供服务）必要的范围内以及采用指定目标专用的方式收集和处理客户数据。立即删除或销毁不必要的的数据。采用之前同意的方式以外的方式使用数据时，只有在分别征得数据主体同意后或者在适用法律规定的条件下方可进行；
- c. The managers and employees of the Company shall register and preserve the data and documents associated with the provision of services, including: 公司应在实现指定目标（提供服务）必要的范围内以及采用指定目标专用的方式收集和处理客户数据。立即删除或销毁不必要的的数据。采用之前同意的方式以外的方式使用数据时，只有在分别征得数据主体同意后或者在适用法律规定的条件下方可进行：
 - i. documents, which specify the rights and obligations of the Company and the clients, or the conditions of provision of service by the Company to the clients; 载明公司和客户各自的权利和义务或者规定公司向客户提供服务的条件的文档；
 - ii. details of provided services and transactions and any communications between the clients and the Company to the extent, which ensures an overview of the



actions of the Company in the provision of services. 提供的服务、客户和公司之间成交的交易和任何通信的详细信息，其详细程度应确保概要说明公司在提供服务的过程中采取的行动。

- d. The managers and employees of the Company shall register and preserve the data on the decisions pertaining to the business and management of the Company, and preserve the internal procedure rules of the Company; 公司的经理和员工应登记和留存有关公司业务和管理决策的资料，并留存公司的内部程序规则；
- e. A person appointed by the Management Board of the Company shall keep records of the documents of the Company and shall organise preservation and archival of such documentation the conditions and pursuant to procedures specified by law and internal procedure rules (including periods of preservation); 公司管理委员会应任命一人负责保管公司的文件记录，并依照法律和内部程序规则（包括留存时长）规定的程序和条件整理此等文档的留存和归档；
- f. The Company shall preserve data for at least five years, unless other terms for the preservation of data or documents are prescribed by the applicable law and the internal regulations of the Company or the decisions of the managing bodies of the Company; 公司资料应至少留存五年，除非适用法律、公司的内部规章制度或公司管理机构决策规定以其他时长留存资料或文档；
- g. Client agreements and/or conditions of the provision of service by the Company to the Clients shall be preserved for at least as long as the contractual or other legal relationship connected to the provision of investment services or ancillary investment services to the Client continues, unless a longer term is specified by the applicable law. 客户协议和/或公司向客户提供服务的条件应至少在向客户提供投资服务或辅助投资服务相关的合同或其他法律关系的持续期间留存，除非适用法律规定了较长期限。

7. Cookies

When using the Company's Website, we may use cookies to collect information. A cookie is a small data file that is stored on the Clients' computer, for the purpose of making it easier for them to navigate the Website by for example; remembering their IDs, passwords and viewing preferences, thus allowing them to visit member-only areas of the Website without logging in again. The Clients can set their web browser to inform them when cookies are enabled, or to disable cookies. If the Clients do not wish to receive cookies, most web browsers will permit them to decline/disable cookies and in most cases will still allow them complete access to our Website. 您在使用公司网站时，我们可能会使用 cookie 来收集信息。Cookie 是存储在客户电脑中的小数据文件，其目的是帮助客户更方便的浏览网站，例如记住客户 ID、密码和浏览喜好等，从而使客户能够访问网站的会员专区，而无需再次登录。客户可设置网络浏览器在启用 cookie 时发出通知，以及禁用 cookie。如果客户不希望收到 cookie，大多数网络浏览器允许其拒绝/禁用 cookies。在大多数情况下，用户仍然能够访问我们网站的完整内容。

8. Tracking Systems 跟踪系统

Tracking systems used on the Company's Website(s) may collect data detailing the pages you have accessed, how you discovered this site, the frequency of visits etc; this information is obtained in order to improve the content of the Company's website and may also be used to contact the Clients, through any appropriate means and providing the Clients with any information the Company believes to be useful to them. 公司网站中使用的跟踪系统可能



会收集您访问页面中详述的数据，以及您如何发现该网站、您的访问频率等；获取该信息的目的是为了改进公司网站的内容，也可用于通过任何适当的方式联系客户并向客户提供其认为对客户有用的任何信息。

9. Security 安全

The privacy and confidentiality of the Clients personal information is of fundamental importance to the Company. The Company takes all appropriate security measures to protect against unauthorised access to or unauthorised alteration, disclosure or destruction of data and personal information. 保护客户个人资料的隐私和机密性是公司的基本纲领。公司将采取一切适当的安全措施来防止未经授权的访问、未经授权的变更、披露或销毁数据和个人信息。

The Company restricts access to personal information to employees who need to know the specific information in order to operate, develop or improve Company's services. These individuals are bound by confidentiality and will be subject to penalties if they fail to meet these obligations. 只有出于经营、开展或改进公司服务的需要了解具体信息的员工方可访问个人信息。这些个人应遵守保密条款，如果未能履行该义务，则将受到处罚。

10. Legal Disclaimer 免责声明

The Company reserves the right to disclose the Clients' personally identifiable information as required by rules and regulations and when the Company believes that disclosure is necessary to protect their rights and/or to comply with a judicial proceeding, court order, or legal process served. The Company will not be liable for misuse or loss of personal information resulting from cookies on the Company's Website(s) that the Company does not have access to or control over. The Company will not be liable for unlawful or unauthorised use of Clients' personal information due to misuse or misplacement of your passwords, negligent or malicious. 在以下情形下，公司有权披露客户的个人身份信息：规章制度要求时、公司认为披露是保护客户权利时和/或遵守司法程序、法院指令或送达的法律程序传票所必需的。对于公司网站中存在的公司并不拥有或控制的 cookie 导致的个人信息滥用或丢失，公司不承担责任。由于客户无意或蓄意滥用或遗忘密码导致的非法或违规使用客户个人信息的，公司不承担责任。

11. Amendment/Review 修订/审查

The Company will not be obliged to notify its Clients individually of changes, other than substantial material changes to the policy. Thus, the Clients should refer to the Company's Website for the latest and most up to date version of the Policy, which will be applicable from the date of publication on the web. 公司没有义务分别通知客户本协议的变更，除非出现实质性的重大变更。因此，客户应参考公司的网站，获得本政策的最近和最新版，其将在网站中公布之日起开始实施。