



CARGO METALS
Your trusted partner in global metals trading

Privacy Policy

Cargo Metals Limited
Corporate Privacy Policy
Version 1.0 | Effective Date: July 30, 2025



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Effective Date: July 30, 2025

Jurisdiction: Hong Kong SAR

Prepared by: Legal & Compliance Department

Applies to: Clients, Suppliers, Agents, and Website Visitors



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1. Purpose of This Policy

This Privacy Policy outlines how Cargo Metals Limited ("the Company") collects, processes, stores, and protects personal and corporate data in the course of its trading operations and website activities.

2. Scope of Application

This policy applies to:

- Clients and suppliers engaged in trade transactions
 - Agents, brokers, and logistics partners
 - Visitors to the Company's website or digital platforms
 - Any individual or entity submitting data to the Company
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3. Types of Data Collected

The Company may collect the following categories of data:

- Contact details (name, email, phone number)
 - Company registration and ownership information
 - Trade documentation (invoices, contracts, shipping records)
 - Financial identifiers (bank account details, payment references)
 - Website usage data (IP address, browser type, cookies)
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4. Legal Basis for Processing

Cargo Metals processes data under the following legal bases:

- Performance of a contract
 - Compliance with legal obligations
 - Legitimate business interests
 - Consent (where applicable)
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5. Use of Personal and Corporate Data

Data may be used for:



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- Facilitating trade transactions
 - Conducting due diligence and KYC procedures
 - Communicating with counterparties
 - Complying with regulatory and tax obligations
 - Improving operational efficiency and service delivery
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6. Data Sharing & Disclosure

Data may be shared with:

- Banks and trade finance institutions
- Logistics and inspection partners
- Regulatory authorities (upon lawful request)
- Internal departments for operational purposes

Cargo Metals does not sell or lease personal data to third parties.

7. Data Retention

All data shall be retained for a minimum of seven (7) years from the date of transaction or account closure, unless otherwise required by law.

8. Data Security Measures

Cargo Metals implements appropriate technical and organizational measures to protect data, including:

- Secure servers and encrypted communications
 - Access controls and audit trails
 - Staff training on data handling and confidentiality
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9. Rights of Data Subjects

Individuals may request:

- Access to their personal data
- Correction of inaccurate data
- Erasure of data (subject to legal retention requirements)
- Restriction or objection to processing



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Requests should be submitted to:
compliance@cargometals.com

9A. Cross-Border Data Transfers & Third-Country Compliance

Cargo Metals Limited operates across multiple jurisdictions and may transfer personal or corporate data to countries outside the Hong Kong SAR for the purposes of trade execution, compliance, and operational support.

Where such transfers occur, the Company shall ensure that:

- The receiving jurisdiction offers an adequate level of data protection, or
- Appropriate safeguards are implemented, such as contractual clauses or regulatory approvals

Cargo Metals endeavors to comply with applicable third-country data protection laws, including but not limited to:

- General Data Protection Regulation (GDPR) – European Union
- Personal Information Protection Law (PIPL) – People's Republic of China
- UK Data Protection Act 2018 – United Kingdom
- Applicable U.S. state-level privacy laws, including but not limited to the California Consumer Privacy Act (CCPA)

Data subjects may request further information on cross-border safeguards by contacting:
compliance@cargometals.com

10. Website Cookies & Tracking

The Company's website may use cookies to enhance user experience and collect analytics. Users may manage cookie preferences via browser settings.

11. Contact Information

For privacy-related inquiries, please contact:
Legal & Compliance Department
Cargo Metals Limited
Email: compliance@cargometals.com



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12. Amendments & Review

This policy is reviewed annually and may be updated to reflect changes in law, technology, or business operations. The latest version will be published on the Company's website.