

## Personal Data (Privacy) Policy

In order to facilitate customers to obtain suitable products and services, its subsidiaries (the "Group") will use customer information to provide customers with the best services. However, we also understand that our customers are very concerned about the use of their personal data. Therefore, the Group has established the following codes of conduct and is committed to Account information is kept confidential:

1. At any time, individual customers are required to provide personal data ("data") to the Group for purposes under the Personal Data (Privacy) Ordinance (Chapter 486 of the Laws of Hong Kong). Information about customers (or other information) may be used for the following purposes:
  - a) Daily operations of services and facilities provided to customers;
  - b) Conduct credit checks;
  - c) Assist other institutions in credit review;
  - d) Ensure that customers' credit is maintained in good condition;
  - e) Design financial services or related products for customer use;
  - f) Promote financial services and related products to customers;
  - g) Determine the amount of debt owed to the customer or defaulted by the customer;
  - h) Comply with the disclosure requirements under any laws or regulations; and
  - i) Any purpose related to any of the foregoing.
2. Information (and other information) held by the Group about customers will be kept confidential, but the Group may disclose all information (and other information) to the following persons, and the customer agrees to disclose all information (and other information) to which the Group Conditions for customers to provide services, products and information:
  - a) Any officer, employee, agent, contractor or third party who provides administrative, credit information, debt collection, telecommunications, computer, payment or other services to the Group in connection with its business operations;
  - b) Any financial institution with which the customer has or intends to conduct transactions;
  - c) Regulatory authorities and other relevant government agencies;
  - d) Any other person who has a duty to keep the information confidential for the Group, including companies within the Group that are committed to keeping such information confidential.
  - e) The use of customer information among companies within the group must be in accordance with strict internal security standards, confidentiality policies and applicable laws.
  - f) We bind our employees to fully comply with such standards, policies and laws.
  - g) Except for the purpose of conducting business, complying with applicable laws, protecting against fraud, or making product and service offers that we believe may be in the interests of our customers, We do not distribute customer information to other companies. We may also provide information to regulatory authorities and law enforcement officials in accordance with applicable law.
  - h) We have set extremely high standards to protect customer information from unauthorized alteration or destruction.
3. The Group may carry out the following activities in accordance with the Personal Data (Privacy) Ordinance and other applicable laws:
  - a) match any information or other information provided by or about the customer with information (or other information) held by the Group or any other person;  
Pair, compare or exchange for:
    - credit review;
    - Information (or other information) verification; or
    - Propose or verify information (or other information) which may be used to take action adverse to the Client or any other person at any time  
move;
  - b) transfer such information (or other information) to any place outside Hong Kong (whether or not such information (or other information) is processed, held or used outside Hong Kong material)).
4. The Group intends to use customers' personal data for direct marketing, for which we must obtain the customer's consent (including an indication of no objection). In this regard, customers are kindly requested to note:
  - a) Names, contact details, product and service portfolio information, trading patterns and behaviour, financial background and statistics of customers held by the Group from time to time  
The information may be used by the Group for direct marketing;
  - b) The following categories of services and products can be promoted:
    - Finance, securities, commodities, foreign exchange, gold and silver investment and related financial services and products;
    - Rewards, incentives or discount schemes in relation to the promotional categories mentioned above;and
    - Applications for services and products (as the case may be) in relation to the promotional categories mentioned above are provided by the Group's associate partners.  
The names of these joint venture partners will be provided on the form).
5. Under and subject to the terms of the Personal Data (Privacy) Ordinance, every customer has the right to:
  - a) Check whether the Group holds information about customers and whether it has the right to use such information;
  - b) Request the Group to correct any incorrect information about customers; and
  - c) Determine the Group's data-related policies and practices and obtain information on the types of personal data the Group holds about its customers.
6. In accordance with the terms of the Personal Data (Privacy) Ordinance, the Group reserves the right to charge a reasonable fee for processing any request for data access.
7. At the Group, information about customers will only be used for the legitimate purposes of conducting our own business, to provide quality services, and to develop product designs and offers, thereby showing that we understand our customers and their needs.

## 個人資料(私隱)政策

為方便客戶獲得合適的產品和服務，其附屬公司(“本集團”)將會利用客戶的資料，為客戶提供最佳之服務。然而，我們亦明白到客戶對於其個人資料的使用非常關注。因此，本集團訂立了以下守則，矢志承諾對客戶的資料保密：

1. 無論任何時候，個人名義的客戶均需要向本集團提供個人資料(「資料」)，以作個人資料(私隱)條例(《香港法例》第486章)下之用途。有關客戶的資料(或其他資料)可能用於以下用途：
  - a) 向客戶提供之服務及設施之日常運作；
  - b) 進行信貸審查；
  - c) 協助其他機構進行信貸審查；
  - d) 確保客戶的信用維持良好；
  - e) 設計供客戶使用之金融服務或相關產品；
  - f) 向客戶推廣金融服務及相關產品；
  - g) 厘定拖欠客戶或客戶拖欠之債務金額；
  - h) 根據任何法例或規例之規定，符合作出披露之要求；及
  - i) 與任何前述部份有關之任何用途。
2. 本集團持有之客戶有關的資料(及其他資料)將會保密，但本集團可向以下人士披露所有資料(及其他資料)，而客戶同意披露所有資料(及其他資料)亦是本集團向客戶提供服務、產品及資料之條件：
  - a) 任何向本集團提供有關其業務運作之行政、信貸資料、債務追討、電訊、電腦、繳款或其他服務之高級職員、雇員、代理、承包商或第三者；
  - b) 客戶已有或擬與之進行交易之任何金融機構；
  - c) 監管當局及其他有關政府機構；
  - d) 任何有責任為本集團保密之其他人士，包括本集團以內承諾保持此等資料機密之公司。
  - e) 本集團內公司之間對客戶之資料使用，須依據嚴格之內部安全標準、保密政策及適用法律。
  - f) 我們約束雇員完全遵守該等標準、政策及法律。
  - g) 除為了進行業務、遵守適用法律、保護免受欺詐或作出我們認為可能符合客戶利益之產品及服務優惠外，我們不會將有關客戶的資料分發予其他公司。我們亦可依據適用法律向監管當局及執法人員提供資料。
  - h) 我們訂立了極高標準，以保護客戶的資料免受未經授權之更改或破壞。
3. 本集團可依據個人資料(私隱)條例及其他適用法律進行以下活動：
  - a) 將客戶提供或有關客戶之任何資料或其他資料，與本集團或任何其他人士持有之資料(或其他資料)進行配對、比較或交換，以作以下用途：
    - 信貸審查；
    - 資料(或其他資料)核對；或
    - 提出或核對資料(或其他資料)，該等資料可能用於在任何時候採取對客戶或任何其他人士不利的行動；
  - b) 將此等資料(或其他資料)轉往香港以外任何地方(不論在香港以外處理、持有或使用此等資料(或其他資料))。
4. 本集團擬使用客戶的個人資料作直接促銷，為此我們須取得客戶的同意(包括表示不反對)。就此，請客戶注意：
  - a) 本集團不時持有的客戶的姓名、聯絡詳情、產品及服務投資組合信息、交易模式及行為、財務背景及統計資料可由本集團用於直接促銷；
  - b) 以下服務及產品的類別可作推廣：
    - 財務、證券、商品、外匯、金銀投資及相關金融服務和產品；
    - 有關上文所述促銷類別的獎賞、獎勵或優惠計劃；及
    - 由本集團的聯營夥伴提供有關上文所述促銷類別的服務和產品(有關服務和產品(視何情況而定)的申請表上會提供該等聯營夥伴的名稱)。
5. 根據及依據個人資料(私隱)條例之條款，每位客戶均有權：
  - a) 檢查本集團是否持有有關客戶之資料，及是否有權使用此等資料；
  - b) 要求本集團更改有關客戶之任何錯誤資料；及
  - c) 確定本集團有關資料之政策及做法，以及獲知本集團持有有關客戶之個人資料種類。
6. 依據個人資料(私隱)條例之條款，本集團有權就處理任何資料索取查閱之申請收取合理費用。
7. 在本集團，有關客戶之資料只會用於進行本身業務的合法用途，以提供優質服務，及進行產品設計及優惠，從而顯示我們明白客戶及其需要。