



HUATAI FINANCIAL HOLDINGS (HONG KONG) LIMITED

DATA PRIVACY POLICY AND PERSONAL INFORMATION COLLECTION STATEMENT

Huatai Financial Holdings (Hong Kong) Limited (referred to hereinafter as “**Huatai**”) and its holding companies, subsidiaries, affiliates or business partners of Huatai, whether in Hong Kong or elsewhere (“**Associates**”) recognizes its responsibilities in relation to the collection, holding, processing, use and/or transfer of its Data Subject’s personal data under the Personal Data (Privacy) Ordinance (Cap. 486) (“**PDPO**”).

The term “**Data Subject**” refers to the individual who is the subject of the personal data received by Huatai and/or its Associates.

The term “personal data” refers to any data (i) relating directly or indirectly to the Data Subject; (ii) from which it is practicable for the identity of the Data Subject to be directly or indirectly ascertained; and (iii) in a form in which access to or processing of the data is practicable.

Please note that failure by the Data Subject to supply such data may result in Huatai being unable to open or continue operation of the relevant accounts on behalf of the Data Subject (the “**Account**”), to provide the information, products or services as requested by the Data Subject or comply with any laws or guidelines issued by regulatory or other authorities.

Purpose: From time to time, it is necessary for Huatai to collect the Data Subject’s personal data which may be used, stored, processed, transferred, disclosed or shared by Huatai for any one or more of the following purposes (“**Purposes**”), including:

1. the daily operation of the facilities, services or products provided to the Data Subject and the Account;
2. designing financial services or related products for the Data Subject’s use;
3. processing and evaluating any applications or requests made by the Data Subject for facilities/products/services offered by Huatai or its Associates;
4. providing subsequent services to the Data Subject, including but not limited to administering the facilities/products/services provided by Associates and policies issued herewith;
5. any purposes in connection with any claims made by or against or otherwise involving the Data Subject in respect of any products/services provided by Huatai and/or its Associates;
6. conducting one-off or regular credit checks, maintaining credit history and ensuring ongoing credit worthiness;
7. assisting other institutions to conduct credit checks and collect debts;
8. determining the amount of indebtedness owed to or by the Data Subject;



9. collecting amounts outstanding from the Data Subject and those providing security for the Data Subject's obligation;
10. evaluation of the Data Subject's investment experience (if any), investment objective, risk appetite and financial needs;
11. offering, providing and marketing the products/services of Huatai or its Associates (refer to **"Use and provision of personal data in direct marketing"** below) to the Data Subject, and administering, maintaining, managing and operating such products/services;
12. making disclosure as required by any applicable law, rules, regulations, codes of practice or guidelines or to assist in law enforcement purposes, investigations by police or other government or regulatory authorities in Hong Kong or elsewhere;
13. carrying out other services in connection with the operation of Huatai and/or its Associate's business;
14. complying with the obligations, requirements or arrangements for disclosing and using data that apply to Huatai or that it is expected to comply according to:
 - (a) any law binding or applying to it within or outside Hong Kong existing currently and in the future;
 - (b) any guidelines or guidance given or issued by any legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations of financial service providers within or outside Hong Kong existing currently and in the future;
 - (c) any present or future contractual or other commitment with local or foreign legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations of financial service providers that is assumed by or imposed on Huatai by reason of its financial, commercial, business or other interests or activities in or related to the jurisdiction of the relevant local or foreign legal, regulatory, governmental, tax, law enforcement or other authority, or self-regulatory or industry bodies or associations;
15. complying with any obligations, requirements, policies, procedures, measures or arrangements for sharing data and information within Huatai and its Associates and/or any other use of data and information in accordance with any regulations for compliance with sanction purposes or prevention or detection of money laundering, terrorist financing or other unlawful activities;
16. enabling an actual or potential assignee of all or any part of the business and/or asset of Huatai or participant or sub-participant of Huatai's rights in respect of the Data Subject, to evaluate the transaction intended to be the subject of the assignment, participation or sub-participation;
17. managing, monitoring and assessing the performance of any agent, contractor or third party service provider who provides administrative, telecommunications, computer, payment or securities clearing or other services to Huatai in connection with the establishment, operation, maintenance or provision of facilities, products and services; and
18. other purposes directly relating to any of the above.



Transfer of personal data: Huatai will duly keep all personal data of the Data Subject confidential but, subject to the provisions of any applicable law, may provide such data to:

1. any of Huatai's Associates, third party financial institutions, third party securities and investment services providers, Huatai's co-branding partners, charitable or non-profit making organisations, the Data Subject's broker, industry associations or federations, fund manager company or financial institutions within Hong Kong or elsewhere and in this regard the Data Subject consents to the transfer of its data outside Hong Kong (including People's Republic of China);
2. credit reference agencies to ensure the credit worthiness of the Data Subject, creating and maintaining credit and risk related models, providing the personal data to credit reference agencies for the purposes of conducting credit checks and other directly related purposes, determining the amount of indebtedness owed to or by the Data Subject and collection of amounts outstanding from the Data Subject and those providing security for the Data Subject's obligations;
3. any person (including private investigators) in connection with any claims made by or against or otherwise involving the Data Subject in respect of any products/services provided by Huatai and/or its Associates;
4. any agent, contractor or third party who provides administrative, telecommunications, computer, payment or securities clearing, technology or other services (including direct marketing services) to Huatai and/or its Associates in Hong Kong or elsewhere (including People's Republic of China), who also has a duty of confidentiality to the same extent as Huatai, as mentioned above;
5. any actual or proposed assignee, transferee, participant or sub-participant of Huatai's rights or business; and
6. any government department, other appropriate governmental or regulatory authority, or self-regulatory industry body or associations of financial services providers, in Hong Kong or elsewhere (including People's Republic of China).

For Huatai's policy on using the Data Subject's personal data for marketing purpose, please see the section below "**Use and provision of personal data in direct marketing**".

Transfer of the Data Subject's personal data will only be made for one or more of the Purposes specified above.

Use and provision of personal data in direct marketing: Huatai intends to use the Data Subject's data in direct marketing and Huatai requires the Data Subject's consent (which includes an indication of no objection) for this purpose. In light of this purpose, Huatai intends to:

1. use the Data Subject's name, contact details, products and services portfolio information associated with the Account, transaction pattern and behavior, financial background and demographic data held by Huatai from time to time for direct marketing;



2. conduct direct marketing in relation to the following classes of products and services that Huatai, or its Associates may offer:
 - a. financial services, securities, investment services and other wealth management related products and services;
 - b. reward, loyalty, co-branding or privileges programmes and related products and services;
 - c. wealth management or non-wealth management related seminars, events or other activities;
 - d. products and services offered by Huatai's co-branding partners; and
 - e. donations and contributions for charitable and/or non-profit making purposes.
3. the above products and services may be provided by :
 - a. Huatai and/or any of Huatai's Associates;
 - b. third party financial institutions, insurers, securities and investment services providers;
 - c. the business partners / co-branding partners of Huatai and/or Associates providing the product and services set out in (2) above;
 - d. third party reward, loyalty or privileges programme providers supporting Huatai or any of the above listed entities; and/or
 - e. charitable or non-profit making organisations.
4. in addition to marketing the above products and services, Huatai also intends to provide the data described in (1) above to all or any of the persons described in (3) above for use by them in marketing those products and services, and Huatai requires the Data Subject's written consent (which includes an indication of no objection) for that purpose;
5. Huatai may receive money or other property in return for providing the data to the other persons in (4) above and, when requesting Data Subject consent or no objection as described in (4) above, Huatai will inform the Data Subject if it will receive any money or other property in return for providing the data to the other persons.

Before using the Data Subject's personal data for the purpose and providing to the transferees set out above, Huatai must obtain the Data Subject's written consent, and only after having obtained such written consent, may use and provide the Data Subject's personal data for any promotional or marketing purpose.

The Data Subject may in future withdraw its consent to the use and provision of personal data for direct marketing.

The Data Subject may withdraw its consent by sending a notice to Huatai in writing to the address in the section on "**Access and correction of personal data**". Huatai shall, without charges to the Data Subject, ensure that the Data Subject is not included in future direct marketing activities.

Access and correction of personal data: under the PDPO, the Data Subject has the right to ascertain whether Huatai holds the Data Subject's personal data, to obtain a copy of the said data, and to correct any data that is inaccurate or has subsequently been changed. The Data Subject may also request Huatai to inform the Data Subject of the type of personal data held by Huatai.



All requests for access to, correction and changes of the Data Subject's data held by Huatai or for information regarding policies and practices and kinds of data held by Huatai should be addressed in writing to:

Data Privacy Officer
Huatai Financial Holdings (Hong Kong) Limited
Unit 5801, 58/F
The Center,
99 Queen's Road Central, Hong Kong

A reasonable fee may be charged to offset Huatai's administrative and actual costs incurred in complying with the Data Subject's data access requests mentioned above.

Recordkeeping: After termination of service or closure of the relevant account, Huatai shall continue to hold data relating to the Data Subject for a period of time as Huatai considers prudent or such other period as prescribed by applicable laws and regulations.

Circulate to all Data Subject(s): Please circulate this document to any and all Data Subject(s) relating to your account(s) at Huatai.

Should there be any inconsistencies between the English and Chinese versions of this document, the English version shall prevail.



華泰金融控股(香港)有限公司 資料私隱政策及個人資料收集聲明

華泰金融控股(香港)有限公司(下文稱為「華泰」)及其控股公司、附屬公司、聯屬公司或華泰的業務夥伴(不論在香港或其他地方)(「關聯公司」)就根據《個人資料(私隱)條例》(第486章)(「《私隱條例》」)收集、持有、處理、使用及/或轉移其資料當事人的個人資料承認責任。

「資料當事人」一詞指華泰及/或其關聯公司所取得的個人資料所屬的當事人。

「個人資料」一詞指符合以下說明的任何資料：(i)直接或間接與資料當事人有關；(ii)從資料直接或間接確定資料當事人的身份屬切實可行；及(iii)資料的格式令資料的存取或處理切實可行。

請注意，資料當事人若未能提供有關資料，可能導致華泰無法代資料當事人開立或繼續操作相關帳戶(「帳戶」)或按資料當事人要求提供資料、產品或服務或遵守監管機構或其他當局發佈的任何法律或準則。

用途：華泰需要不時收集資料當事人的個人資料，有關資料可供華泰使用、儲存、處理、轉移、披露或共享作下列任何一個或多個用途(「用途」)，包括：

1. 向資料當事人及帳戶提供資金融通、服務或產品所涉及的日常運作；
2. 設計供資料當事人使用的金融服務或相關產品；
3. 處理及評估資料當事人就華泰或其關聯公司提供的資金融通/產品/服務作出的任何申請或要求；
4. 向資料當事人提供後續服務，包括但不限於管理由關聯公司提供的資金融通/產品/服務及政策；
5. 與任何申索有關的任何用途，有關申索乃就華泰及/或其關聯公司提供予資料當事人或資料當事人以其他方式涉及其中的任何產品/服務；
6. 進行一次性或定期信貸檢查、維持信貸記錄及確保信貸價值；
7. 協助其他機構進行信貸檢查及追收債務；
8. 確定欠資料當事人的債務或由資料當事人所欠的債務金額；
9. 向資料當事人及向為資料當事人的債務提供抵押的人士追收欠款；
10. 評估資料當事人的投資經驗(如有)、投資目標、風險承受程度及財務需要；
11. 向資料當事人發售、提供及營銷華泰或其關聯公司的產品/服務(請參閱下文「**在直接營銷中使用及提供個人資料**」)，以及監管、維持、管理及操作有關產品/服務；
12. 按任何適用法律、規則、法規、實務守則或指引的規定作出披露或就執法、香港或其他地方的警方或其他政府或規管當局的調查提供協助；
13. 進行與華泰及/或其關聯公司業務的運作有關的其他服務；



14. 遵守根據下列各項適用於華泰或華泰被預期遵守有關披露及使用資料的義務、要求或安排：
 - (a) 目前及未來在香港境內或境外存在，而且對其具約束力或適用於其的任何法律；
 - (b) 目前及未來在香港境內或境外存在，由任何法律、規管、政府、稅務、執法或其他當局，或金融服務供應商的自律規管或行業組織或協會發出或頒佈的任何指引或指導；
 - (c) 華泰因相關地方或海外法律、規管、政府、稅務、執法或其他當局，或自律規管或行業組織或協會所在司法管轄區中或與該司法管轄區有關的財務、商業、業務或其他利益或活動，而對地方或海外的法律、規管、政府、稅務、執法或其他當局，或金融服務供應商的自律規管或行業組織或協會承擔或被施加的任何現有或未來合約或其他承諾；
15. 根據符合制裁或防止或偵測洗錢、恐怖分子籌資、或其他不合法活動的任何法規，為在華泰及其關聯公司內共享數據及資料及 / 或數據及資料的任何其他使用，遵守任何義務、要求、政策、程序、措施或安排；
16. 使華泰的業務及 / 或資產的全部或任何部分的實際或潛在承讓人，或華泰對資料當事人權利的參與者或附屬參與者能夠評估擬作為轉讓、參與或附屬參與的交易；
17. 管理、監察及評估向華泰提供有關設立、操作、維持或提供資金融通、產品及服務的行政、通訊、電腦、付款或證券結算或其他服務的任何代理、承包商或第三方服務供應商的表現；及
18. 與任何上述直接有關的其他用途。

轉移個人資料：華泰將對資料當事人的全部個人資料妥為保密，但受制於任何適用法律的條文，可將有關資料提供予：

1. 香港境內或其他地方任何華泰的關聯公司、第三方金融機構、第三方證券及投資服務供應商、華泰的合作品牌夥伴、慈善或非牟利組織、資料當事人的經紀、行業協會或聯會、基金管理公司或金融機構，而資料當事人就此同意其資料可在香港境外（包括中華人民共和國）轉移；
2. 信貸諮詢機構，以確保資料當事人的信貸價值、設立及維持信貸及風險相關模型、向信貸諮詢機構提供個人資料作信貸檢查用途及其他直接相關用途、確定對資料當事人的結欠或由資料當事人結欠的債項金額及向資料當事人及向為資料當事人的債務提供抵押的人士追收欠款；
3. 與就華泰及 / 或其關聯公司提供的任何產品 / 服務由資料當事人作出或針對資料當事人作出或資料當事人以其他方式涉及其中的任何申索有關的任何人士（包括私人調查員）；
4. 在香港或其他地方（包括中華人民共和國）向華泰及 / 或其關聯公司提供行政、通訊、電腦、付款或證券交收、技術或其他服務（包括直接營銷服務）的任何代理、承包商或第三方，其亦負有與華泰相同程度（如上文所述）的保密責任；
5. 任何實際或建議承讓人、受轉人、華泰的權利或業務的參與者或附屬參與者；及
6. 在香港或其他地方（包括中華人民共和國）的任何政府部門、其他適用政府或規管當局或金融服務供應商的自律規管或行業組織或協會。



有關華泰對使用資料當事人的個人資料作營銷用途的政策，請參閱下文「**在直接營銷中使用及提供個人資料**」一節。

資料當事人的個人資料的轉移僅可作上述一個或多個用途。

在直接營銷中使用及提供個人資料：華泰打算在直接營銷中使用資料當事人的資料，而華泰須就此用途取得資料當事人的同意（包括表示不反對）。鑒於此用途，華泰打算：

1. 將華泰不時持有的資料當事人姓名、聯絡資料、與帳戶有關的產品及服務投資組合資料、交易模式及行為、財務背景及人口統計數據用作直接營銷；
2. 直接營銷華泰或其關聯公司可能發售的以下產品及服務類別：
 - a. 金融服務、證券、投資服務以及其他理財相關產品及服務；
 - b. 獎賞、年資、合作品牌或優惠計劃以及相關產品及服務；
 - c. 理財或非理財相關研討會、事項或其他活動；
 - d. 由華泰的合作品牌夥伴提供的產品及服務；及
 - e. 慈善及 / 或非牟利用途的捐贈及捐款。
3. 上述產品及服務可由以下各方提供：
 - a. 華泰及 / 或華泰的任何關聯公司；
 - b. 第三方金融機構、保險公司、證券及投資服務供應商；
 - c. 提供上文第(2)項載列的產品及服務的華泰及 / 或關聯公司業務夥伴 / 合作品牌夥伴；
 - d. 支援華泰或上文所列任何實體的第三方獎賞、年資或優惠計劃供應商；及 / 或
 - e. 慈善或非牟利組織。
4. 除上述產品及服務的營銷外，華泰亦打算向上文第(3)項所述的全部或任何人士提供上文第(1)項所述的資料，以供彼等在營銷該等產品及服務時使用，而華泰需要就該用途取得資料當事人的書面同意（包括表示不反對）；
5. 華泰可能就向上文第(4)項所述其他人士提供資料而取得金錢或其他財產作為回報，而當要求按上文第(4)項所述取得資料當事人同意或不反對時，華泰將通知資料當事人其會否就向其他人士提供資料而取得任何金錢或其他財產作為回報。

使用資料當事人的個人資料作該用途及提供予上文載列的受轉人前，華泰必須取得資料當事人的書面同意，並僅可在已取得有關書面同意後方可使用及提供資料當事人的個人資料作任何宣傳或營銷用途。

資料當事人日後可就使用及提供個人資料作直接營銷用途撤回其同意。

資料當事人可透過向「存取及更正個人資料」一節中的地址寄發書面通知給華泰撤回其同意。華泰應（在並無向資料當事人收費的情況下）確保，資料當事人將不包括在未來的直接營銷活動之內。



存取及更正個人資料：根據《私隱條例》，資料當事人有權確定華泰是否持有資料當事人的個人資料、取得上述資料的副本，以及糾正不準確或其後已變更的任何資料。資料當事人亦可要求華泰通知資料當事人華泰持有的個人資料類型。

存取、更正及變更華泰持有的資料當事人資料，或索取有關政策及慣例的資料，以及華泰持有的資料種類等所有要求應以書面方式向以下人士提出：

私隱保護主任

華泰金融控股(香港)有限公司

香港皇后大道中99號

中環中心

58樓5801室

華泰可能收取合理費用以抵銷華泰因遵守資料當事人的上述資料存取要求而產生的行政及實際成本。

保存記錄：終止服務或結束相關帳戶後，華泰應在華泰認為審慎的時間或適用法律及法規指明的有關其他期間內繼續持有有關資料當事人的資料。

供所有資料當事人(一名或多名)傳閱：請讓與閣下在華泰開設的帳戶有關的任何及全部資料當事人(一名或多名)傳閱此文件。

倘若此文件的英文與中文版本之間有任何不符之處，概以英文版本為準。