

Privacy Policy of CCB International (Holdings) Limited and its subsidiaries which carry on business in Hong Kong

This Privacy Policy ("**Policy**") applies to CCB International (Holdings) Limited and its subsidiaries (collectively, "**CCBI**") which controls the collection, holding, processing or use of data (including personal data).

This Policy sets out when, how and why CCBI may collect, use and transfer your data and how you may access your personal data and your correction rights. This Policy applies to all products and services provided or managed by CCBI (including but not limiting to where CCBI acts as the investment advisor).

The provisions of this Policy constitute part of the account term and conditions and/or agreement or arrangements that you enter into with CCBI. If any discrepancy is identified, the terms of this Policy shall prevail. **If you do not agree to the processing of your data in the way this Policy describes, please do not provide your data when requested and stop using the relevant product or service. By using the product or service, you are acknowledging our rules regarding your data as described in this Policy.**

1. **The Types of Data We Use:** CCBI may collect and/or hold (including but not limited to via documentation or telephone recording system), for the purposes as stated in this Policy, your data (including personal data). Depending on the Product or Service provided (as defined below in paragraph 4), data collected, processed, retained and/or transferred (as applicable) includes (but is not limited to) your name, contact information, residential and correspondence address, IP addresses, phone number, fax number, email address, date of birth, nationality, identity card number, travel document information, gender, employment and occupation record, family, educational background, investment appetite and experience, financial information, transaction records, behavior and pattern, bank account information and bank card details, facial recognition data, voice recognition data, images and photographs, demographic information or identifier(s) that are held in a cookie or processor serial number that is combined with other personal data (collectively, "**Data**"). References to "your Data" mean the data of the customer(s) of CCBI and various other persons, including without limitation, applicants for Products and/or Services, sureties and persons providing security or guarantee or any form of support for obligations owed to CCBI, shareholders, directors, corporate officers and managers, sole proprietors, partners, suppliers, contractors, service providers and other contractual counterparties supplying data to CCBI.

If you are a user of our app(s), CCBI may collect/or hold your Data in the following main circumstances:

- (i) App account opening and management. Some of our app services can only be used after you register a member account with us. During the process of account opening and management with our app(s), you may provide Data including but not limited to contact details.
- (ii) Account opening and identity verification. During the account opening application process, we will collect/or hold your Data including but not limited to name, account opening data, images/photographs, identity documents (such as identity cards, by OCR recognition), bank cards, facial recognition data, voice recognition data and mobile number. We will share your Data with the third party service providers for identity verification (such as Global Digital Cybersecurity Authority Co., Ltd for mainland China users and relevant banks).
- (iii) Services and transactions, and other purposes. To provide the app services, facilitate transactions, or other purposes as notified to you when the app launches, we will collect/or hold your Data including but not limited to contact details, IP addresses, financial information and transaction records.

In order to provide related Products and Services in our app(s), we need your authorization to open the following related permissions to collect related information including but not limited to camera, microphone and/or browser. If you refuse to enable relevant permissions, you may not be able to obtain Products or Services or related functions.

2. You have a right not to provide your Data. However, if you fail to supply or if CCBI is unable to collect such Data, it may result in CCBI being unable to offer or continue its Product or Service, open or continue the account(s), establish or continue financing facilities, establish or maintain the business relationship between you and CCBI in the ordinary course of business or comply with any laws, regulations or guidelines issued by regulatory or other authorities.
3. CCBI may at any time conduct credit enquiries on you to verify the information you provide to CCBI through, including but not limited to, your bankers, brokers and any credit agency.
4. **How We Use Your Data:** The purposes for which your Data may be used will vary according to the nature of your relationship with CCBI. In general, they may consist of any or all of the purposes as follows:

- (i) opening and administering your account(s) with CCBI, including Know-Your-Client (KYC), Anti-Money Laundering and Counter-Terrorist Financing (AML/CTF) and other account opening and verification procedures in accordance with applicable laws and regulations;
- (ii) operation of the products, services and credit facilities provided to you;
- (iii) making lending and credit analysis decision;
- (iv) conducting credit checks;
- (v) ensuring your ongoing credit worthiness;
- (vi) assisting other financial institutions to conduct credit checks and collect debts;
- (vii) creating and maintaining CCBI's credit scoring models;
- (viii) verifying the data / information provided by any other person(s) or third party;
- (ix) determining the amount of indebtedness owed to you or by you;
- (x) recovery of any monies owed from or liabilities incurred by you and those providing security for your obligations;
- (xi) meeting obligations, requirements or arrangements of CCBI to comply with, or in connection with any laws, regulations or rules binding on CCBI or any rules, codes, guidelines or directions issued by such legal, governmental, regulatory, tax, law enforcement or other authorities with which CCBI is expected to comply (including but not limited to the laws, regulations and international agreements for the implementation of automatic exchange of financial account information ("AEOI") and the U.S. Foreign Account Tax Compliance Act ("FATCA")), including, where applicable, for the purpose of assisting CCBI and/or any investment vehicle that CCBI provides services to in obtaining any exemption, reduction or refund of any withholding or other taxes imposed by any taxing authority or other government agency;
- (xii) marketing services, products and other subjects in relation to asset management, research, investment banking, financing solution, M&A advisory, trading and brokerage, underwriting, investment management services, investment advisory services, custodial services, investment products and other financial services (collectively, "**Products and Services**", and individually, a "**Product or Service**");
- (xiii) use by the directors, trustee, investment managers, investment advisors, administrators, custodians, auditors, registrar, financial advisors, brokers of any investment products that are managed or operated by CCBI (including but not limited to processing of subscription applications);
- (xiv) facilitating the daily operations of the products or services managed, operated or provided by CCBI;
- (xv) creating and maintaining CCBI's customer or potential customer profile and segregation and business model and performing risk management;
- (xvi) providing customer services (including but not limited to communicating with you via telephone, mail, e-mail, facsimile or any other means of communications);
- (xvii) preventing, detecting or reporting any crime or any fraudulent or dishonest behaviour, or any other purpose relating thereto;
- (xviii) designing financial services or related products for customers' use;
- (xix) enabling an actual or proposed assignee, transferee, delegate, service provider of CCBI, or participant, or sub-participant of CCBI's rights and obligations to evaluate the transaction intended to be the subject of the assignment, transfer, delegation, subcontracting, participation or sub-participation;
- (xx) meeting the requirements of the Hong Kong Exchanges and Clearing Limited, the Securities and Futures Commission, any relevant exchange, any legal, governmental, tax, law enforcement or other regulatory authority, body or entity under any applicable laws, rules, regulations, codes, guidelines or directions to which CCBI is subject; and
- (xxi) all other purposes ancillary or relating to items (i) to (xx) above, including seeking professional advices.

5. **How We Store and Share Your Data:** Pursuant to our contract with you to provide you with the relevant Product or Service, your Data will be processed on servers that may not be located where you live. No matter where our servers are located, we take appropriate measures to safeguard your rights in accordance with this Policy. Our servers are located in Hong Kong and other jurisdictions which may be located outside the jurisdiction where you live.

In addition, your Data can be accessed from outside of where you live by our support, engineering and other teams around the world, including Hong Kong, Macau and the People's Republic of China (for the purpose of this Policy, this term excludes Taiwan, Hong Kong and Macau).

Only where necessary (such as to provide the relevant Products and/or Services set out in paragraph 4 above), will we share your Data (including personal data) with third parties. Situations where this occur are:

- (i) any agent, contractor or third party service provider who provides administrative, telecommunications, computer, data processing, information technology, payment or securities clearing or other services to CCBI in connection with the operation of its business and/or provision of the relevant Product or Service, such as third party service providers relevant to KYC and identity verification purposes;
- (ii) any other person under a duty of confidentiality to CCBI, which has undertaken to keep such information confidential;
- (iii) the drawee bank providing a copy of cheque which may contain information about the payee;
- (iv) a person making any payment into your account (by providing a copy of a deposit confirmation slip which

- may contain your name);
- (v) credit reference agencies, and, in the event of default, to debt collection agencies;
- (vi) any bank or financial institution with which the customer has dealings or proposes to have dealings;
- (vii) an actual or proposed assignee, transferee, delegate, service provider of CCBI, or participant, or sub-participant of CCBI's rights and obligations to evaluate the transaction intended to be the subject of the assignment, transfer, delegation, subcontracting, participation or sub-participation;
- (viii) third party financial institutions, insurers, administrators, custodians, trustees, credit card companies, securities and investment services providers;
- (ix) CCBI and/or CCB Group pursuant to any applicable laws, regulations, rules, codes, guidelines or directions to which such entity is subject or for direct marketing of CCBI's and/or CCB Group's Products and Services and in some occasion for gain (if it is to be so provided);
- (x) subject to notifying you of the names of the insurance companies or any other third parties and obtaining your prior written consent, to such insurance companies or third parties for direct marketing of their Products and Services and in some occasion for gain (if it is to be so provided);
- (xi) the directors, trustee, investment managers, investment advisors, administrators, custodians, auditors, registrar, financial advisors, brokers of any investment products that are managed or operated by or of CCBI;
- (xii) any legal, accounting or professional person, firm or body;
- (xiii) the Hong Kong Exchanges and Clearing Limited, the Securities and Futures Commission, any relevant exchange, any legal, governmental, tax, law enforcement or other regulatory authority, body or entity under any domestic and foreign applicable laws and regulations (including but not limited AEOI and FATCA), rules, codes, guidelines or directions to which CCBI (and where applicable, any investment vehicle that CCBI provides services to) is subject; and
- (xiv) if a third party acquires all or substantially all of CCBI's business. CCBI may also disclose your information to third parties if CCBI either: (a) sells, transfers, merges, consolidates or re-organizes any part(s) of the business, or merges with, acquires or forms a joint venture with, any other business, in which case CCBI may disclose your data to any prospective buyer, new owner, or other third party involved in such change to CCBI's business; or (b) sell or transfer any of CCBI's assets, in which case the information CCBI hold about you may be sold as part of those assets and may be transferred to any prospective buyer, new owner, or other third party involved in such sale or transfer
- (xv) if you are a user of our app(s), in order to better provide you with the Products and Services, we may share your Data with third-party components embedded in the app(s) for the purposes as indicated in the section "The Types of Data We Use".

Such information may be transferred to a place outside of where you live.

6. Under AEOI and FATCA, financial institutions including CCBI are required to identify account holders and controlling persons of certain entity account holders who are reportable foreign tax residents and report their personal data (including but not limited to their name, address, jurisdiction(s) of tax residence, tax identification number in that jurisdiction(s), and account balance and income information) to the local tax authority where the financial institution operates or directly to the U.S. Internal Revenue Service. The local tax authority will provide this information to the tax authority of the reportable foreign tax resident's country of tax residence on a regular, annual basis. Without limiting the generality of this Policy, CCBI may transmit Data to the Hong Kong Inland Revenue Department or any other relevant domestic or foreign tax authority for transfer to the tax authority of another jurisdiction. CCBI may transmit Data to the U.S. Internal Revenue Service.

7. Use of Data in Direct Marketing

In the event that CCBI uses your Data in direct marketing, CCBI will obtain your consent (which includes an indication of no objection) for that purpose. In this connection, please note that:

- (i) your name, contact details, products and services portfolio information, transaction pattern and behaviour, financial background and demographic data held by CCBI from time to time may be used by CCBI in direct marketing;
- (ii) the following classes of services, products and subjects may be marketed: the Products and Services;
- (iii) the Products and Services may be provided or (in the case of donations and contributions) solicited by CCBI and/or:
 - (1) any other member of the CCB Group;
 - (2) third party financial institutions, insurers, card companies, securities and investment services providers;
 - (3) third party reward, loyalty or privilege programme providers;
 - (4) co-branding partners of the CCBI and any other member of the CCB Group; and
 - (5) charitable or non-profit making organizations;

- (iv) in addition to marketing the Products and Services, CCBI also intends to provide the data described in paragraph 7(i) above to all or any of the persons described in paragraph 7(iii) above for use by them in marketing the Products and Services, subject to CCBI obtaining your prior written consent (which includes an indication of no objection) for that purpose;
- (v) CCBI may receive money or other property in return for providing the data to the other persons in paragraph 7(iv) above and, when requesting your consent or no objection as described in paragraph 7(iv) above, CCBI will inform you if it will receive any money or other property in return for providing the data to the other persons.

If you do not wish CCBI to use or provide to other persons your Data for use in direct marketing as described above, you may exercise your opt-out right by notifying CCBI at any time in writing to Client Administration at 12/F, CCB Tower, 3 Connaught Road Central, Central, Hong Kong.

8. **Your Rights:** Subject to applicable laws and regulations, you may have the right:

- (i) to check whether CCBI holds personal data about you and, if so, to request to receive a copy of and/or have access to such personal data that CCBI processes about you;
- (ii) to require CCBI to correct any personal data relating to you which is inaccurate;
- (iii) to ascertain CCBI's policies and practices in relation to personal data and to be informed of the kind of personal data held by CCBI;
- (iv) to request CCBI to cease to collect, process, use or provide (and to inform any persons to whom the personal data has been provided to cease to use) the personal data that is stored by us;
- (v) to delete your personal data if you find we collect or use your personal data in violation of applicable laws and regulations or this Policy; and
- (vi) to withdraw your consent or cancel your account in accordance with applicable laws and regulations. In some cases, by withdrawing your consent to our use or disclosure of your personal data, you will not be able to use some of our Products and Services.

9. CCBI has the right to charge a reasonable fee for the processing of any data access request. Any requests for access to personal data, correction of personal data or for information regarding policies, practices and kinds of personal data held can be addressed in writing to Client Administration at 12/F, CCB Tower, 3 Connaught Road Central, Central, Hong Kong.

10. **Cookies and IP address:** CCBI may obtain information about your usage of its website through the use of "cookies". Cookies are small pieces of information which are automatically stored on your web browser in your computer that can be retrieved by the website you visited. Cookies are unlikely to cause damage to or otherwise corrupt or harm your computer or the files you keep on it. Cookies enable CCBI to store information about your preferences (e.g. a language preference or country setting) and offer you certain useful features. If you would prefer to disable cookies, you may do so by changing your browser settings. However you may be unable to access certain part(s) of CCBI's website. In addition, CCBI's server records the IP address of each visitor to its website. This is a number which does not reveal the identity of the individual whose computer it is but is merely an identifier of the computer itself. This can be used solely to record the date, time and length of each visit from that computer. CCBI may use this information to evaluate and improve its website.

11. **Changes:** CCBI reserves the right, at any time and without prior notice, to add to, change, update or modify this Policy, simply by notifying you of such change, update or modification. If CCBI decides to change this Policy, those changes will be notified to you either on CCBI's website or in writing so that you are aware of the change, update or modification. Any such change, update or modification will be effective immediately upon posting.

12. **Contacts and Complaints:** In the event that you have any questions and requests regarding this Policy, or wish to make a complaint about how we process your personal information, please contact us in the first instance in writing to Client Administration at 12/F, CCB Tower, 3 Connaught Road Central, Central, Hong Kong.

13. Nothing in this Policy shall limit your rights under the Hong Kong Personal Data (Privacy) Ordinance.

This Policy is prepared in both English and Chinese and in the event of inconsistency, the English text of this Policy shall prevail.