



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 processing of data (including personal data). The processing of personal data includes the collection, storage, use, processing, transmission, provision, disclosure and deletion, etc. of 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 exercise your rights in relation to personal data. 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 or conducts direct investment business or due diligence).

The provisions of this Policy constitute part of the account terms 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 process (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 2), data collected, processed, retained and/or transferred (as applicable) by CCBI is as follows, among which sensitive personal data is underlined. Any reference to “your data” shall mean data of CCBI’s customers and other persons providing personal data to CCBI.

(1) Account Opening

In the process of account opening with CCBI, we may collect your name, previous name, gender, age, date of birth, place of birth, nationality, citizenship, identity card number, passport number, Hong Kong and Macau travel permit number or other identification document number (and copy of identity card, passport, Hong Kong and Macau travel permit or other identification document), place of residence, current residential address, correspondence address (and copy of residential and correspondence address proof), contact phone number, fax number, e-mail address, residential

condition, family condition, educational background, professional or academic qualifications/knowledge, occupation, company name and job title, personal financial information, including but not limited to income, asset, liquidity, source of funds, source of wealth, financial condition, bank account information, investment objectives, investment records, types of positions held, tax resident identity, investment experience and risk orientation, etc., signature specimen, personal biometric information, voice recognition information, images, photos and other information required under applicable laws and regulations.

(2) Due Diligence, Anti-Money Laundering and Counter-Terrorist Financing (AML/CTF) and Know-Your-Client (KYC) Processes

In order to fulfill the relevant regulations and requirements of regulatory authorities, we may collect your name, previous name, gender, age, date of birth, place of birth, nationality, citizenship, identity card number, passport number, Hong Kong and Macau travel permit number or other identification document number (and copy of identity card, passport, Hong Kong and Macau travel permit or other identification document), place of residence, current residential address, correspondence address (and copy of residential and correspondence address proof), contact phone number, fax number, e-mail address, educational background, professional or academic qualifications/knowledge, occupation, company name and job title, personal financial information, including but not limited to income, asset, liquidity, source of funds, source of wealth, financial condition, bank account information, tax resident identity, investment objectives, investment experience and risk orientation, etc., transaction records, asset list, signature specimen, controller's legal person registration information, property registration information, and other public information on the Internet, in order to carry out due diligence and meet the requirements of the anti-money laundering and counter-terrorist financing (AML/CTF) and know-your-client (KYC) processes.

(3) Account-Related and Transaction Services

In order to provide you with account-related and transaction services, we may collect data such as your investment habits and preferences, profit and loss, social media accounts, and immigration endorsements (for investment immigration accounts only).

(4) Apps

If you are a user of our app(s), CCBI may process your data in the following 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 be required to provide data including but not limited to name, gender, date of birth, contact phone number, e-mail address and other data required under applicable

laws and regulations.

(ii) Account opening and identity verification. During the account opening application process, we will process your data including but not limited to name, previous name, gender, age, date of birth, place of birth, nationality, citizenship, identity card number, passport number, Hong Kong and Macau travel permit number or other identification document number (and copy of identity card, passport, Hong Kong and Macau travel permit or other identification document), place of residence, current residential address, correspondence address (and copy of residential and correspondence address proof), contact phone number, fax number, e-mail address, residence condition, family condition, educational background, professional or academic qualifications/knowledge, occupation, company name and job title, personal financial information, including but not limited to income, asset, liquidity, source of funds, source of wealth, financial condition, bank account information, investment objectives, investment records, types of positions held, tax resident identity, investment experience and risk orientation, etc., signature specimen, images, photos, facial feature pictures and videos taken, voice clips recorded, and other information required under applicable laws and regulations. We will engage third-party service providers for identity verification, in which process such third-party service providers may process your personal data.

(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 process your data including but not limited to contact details, IP addresses, terminal device information, social media accounts, transaction records, investment habits and preference, etc.

In order to provide related Products and Services in our app(s), we need your authorization to enable the following related permissions to collect related data 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.

We may also collect from you the personal data about other persons related to you (for example, collecting the identity card numbers and contact information, etc. of persons you authorize to conduct operations or transactions through your account). When you provide us with such data, please ensure that you have obtained their consent to the provision of their personal data to us and our subsequent processing of their personal data.

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.

CCBI may at any time conduct credit enquiries on you to verify the data you provide to CCBI through, including but not limited to, your bankers, brokers and any credit agency.

2. 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.

- 3. How We Store and Transmit Abroad Your Data:** Pursuant to our contract with you to provide you with the relevant Product or Service, your data may 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, in order to achieve the purposes stated in this Policy, your data may be accessed from outside of where you live by our support, engineering and other teams around the world, including Mainland China, Hong Kong Special Administrative Region and Macau Special Administrative Region.

In order to achieve the purposes stated in this Policy, your personal data collected by us may be stored on or transferred to a system with its server located in Hong Kong Special Administrative Region, and may be accessed by our parent company China Construction Bank Corporation and all of its subsidiaries ("**CCB Group**") and our affiliates located in and/or outside Mainland China,

including but not limited to affiliates located in Hong Kong Special Administrative Region, the United Kingdom and Singapore; your personal data collected by us may also be provided to service providers or other institutions in and/or outside Mainland China. We will comply with the legal requirements in this regard and ensure that the relevant recipients undertake to provide, with respect to your personal data, the same level of protection that such personal data receives in Mainland China. You can contact us through the contact information described in paragraph 9 of this Policy to learn about the overseas recipients who have the right to access your data and to exercise your rights in relation to personal data against the overseas recipients.

We will only retain your data for so long as reasonably necessary for the purposes stated in this Policy, or for such longer period as required by applicable laws or regulations. We will delete or anonymize such data after the expiry of the above-mentioned period or after the purpose of processing has been achieved.

4. How We Engage Third Parties to Process, Share, Transfer and Disclose Your Personal Data

(1) Engagement of Third Parties

In order to achieve the purposes stated in this Policy, we may engage third-party service providers to provide relevant support for our operation and services. In the process of such engagement, your personal data will be processed in order to activate the functions of our products and/or services. These third-party service providers include:

- 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;
- any legal, accounting or professional person, firm or body;
- if you are a user of our app(s), in order to better provide you with the Products and Services, we may, for the purposes as set out in the paragraphs headed “The Types of Data We Use” and “How We Use Your Data”, engage third-party service providers to provide support for the app(s) and the related operation and services, including but not limited to identity verification service providers.

(2) Sharing of Personal Data

We will not share your personal data with any third party except with your consent obtained through this Policy or otherwise. We will share your information (including personal data) with third parties **only as necessary** (such as to provide the relevant products and/or services set out in paragraph 2 above). Applicable circumstances include:

- (i) any other person under a duty of confidentiality to CCBI, which has undertaken to keep such information confidential;
- (ii) the drawee bank providing a copy of cheque which may contain information about the payee;
- (iii) a person making any payment into your account (by providing a copy of a deposit confirmation slip which may contain your name);
- (iv) credit reference agencies, and, in the event of default, to debt collection agencies;
- (v) any bank or financial institution with which the customer has dealings or proposes to have dealings;
- (vi) 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;
- (vii) third party financial institutions, insurers, administrators, custodians, trustees, credit card companies, securities and investment services providers;
- (viii) we may provide your personal data collected by us to CCBI's affiliates 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) or for purpose of unified management of the group (including without limitation internal audits and IT system administration, etc.);
- (ix) 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);
- (x) 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;
- (xi) bankruptcy administrator, provisional liquidator or liquidator appointed or approved by the court;
- (xii) 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/or regulatory authorities or governmental authorities to which CCB Group is subject; and

- (xiii) 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 data) 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 data 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.

Such data may be transferred to a place outside of where you live. When we share your personal data with third parties for the above-mentioned purposes so that they may perform those purposes on our behalf, we will require such third parties to adopt equivalent or stricter privacy protection measures for processing personal data. You have the right to refuse the sharing of data, but if you do not agree to the sharing of data, we may not be able to provide you with certain Products or Services.

(3) Transfer

CCBI may transfer your data 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 transfer 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 data CCBI holds 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. We will give you appropriate notice before transferring your personal data and ensure that your personal data will be protected after such transfer with the same level of protection as stated in this Policy. If the recipient changes the purpose and method of processing, we will require the relevant data recipient to obtain consent from you otherwise.

(4) Disclosure of Personal Data

If we believe it is necessary to disclose your personal data to enforce our terms of service or to protect the rights, property or personal safety of other customers of CCBI, the public or CCBI, we will disclose your personal data subject to requirements of applicable laws and regulations. In addition, upon your request, we will disclose the personal data you designate in such manner of disclosure as you have separately agreed to.

5. Use of Data in Direct Marketing

In the event that CCBI uses your data in direct marketing, CCBI will obtain your consent for that purpose. In this connection, please note that:

- (i) your name, contact information, 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, credit 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 5(i) above to all or any of the persons described in paragraph 5(iii) above for use by them in marketing the Products and Services, subject to CCBI obtaining your prior written consent for that purpose;
- (v) CCBI may receive money or other property in return for providing the data to the other persons in paragraph 5(iv) above and, when requesting your consent as described in paragraph 5(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.
- (vi) CCBI may contact you through various means (including telephone, SMS, fax, e-mail or other electronic means).

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, or unsubscribe the marketing communications through the means provided in the SMS or e-mail.

6. Personal Data of Minors

We do not provide Products and Services for minors under the age of 14, nor do we process any personal data of minors under the age of 14. If we learn that we have collected personal data of minors under the age of 14 unknowingly, we will delete the relevant data as soon as possible. If you have reason to believe that a minor has submitted personal data to us, please contact us through the contact details described in paragraph 9 of this Policy to ensure that such personal data is deleted.

7. How We Protect Your Data

We maintain appropriate technical and organizational protective measures to protect the personal data you provide from any accidental, illegal or unauthorized destruction, loss, alteration, access, disclosure or usage.

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, to require CCBI to provide explanation and clarification on its policies and practices and to be informed of the kind of personal data held by CCBI about you;
- (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 or you have the right to request deletion of personal data under laws and regulations; 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; and
- (vii) if you are a close relative of a deceased customer of CCBI, for your own legitimate rights and interests, you may contact us through the contact details described in

paragraph 9 of this Policy to exercise the rights in relation to the personal data of the deceased customer we hold, unless otherwise arranged by the customer during his/her lifetime. In order to fully protect the rights in relation to the personal data of the deceased customer, we may inform you of the specific application procedures and requirements when you contact us, and you are required to follow our instructions in submitting the application.

9. CCBI has the right to charge a reasonable fee for the processing of frequently repeated data access request within a certain period. If you wish to exercise any of the foregoing rights, you can submit a request in writing to Client Administration at 12/F, CCB Tower, 3 Connaught Road Central, Central, Hong Kong, and we will respond to your request as soon as possible upon verification of your identity.
10. **Cookies and IP Address:** CCBI may obtain data about your usage of its website through the use of "cookies". Cookies are small pieces of data 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 data 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 data 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, and we will notify you of and/or obtain your consent to such change, update or modification if required by laws and regulations. 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 such changes. If we make substantial changes to this Policy, we will contact you in a more prominent manner (including but not limited to by written notice, etc.) and explain the major changes to this Policy. Regardless of whether we have sent you a specific notice of the changes, the updated Policy will be binding upon you and us if you continue to use the Product(s) or Service(s) we provide.
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 data, please contact us in the first instance in writing to Client Administration at 12/F, CCB Tower, 3 Connaught Road

Central, Central, Hong Kong, and we will respond to your request as soon as possible upon verification of your identity.

- 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.