

**Personal Data Privacy Policy of Partners Capital Securities Limited,
its holding companies and associated companies (“Our Group”) and
Direct Marketing under Personal Data (Privacy) Ordinance (the “Ordinance”)**

Investment and Financial services may essentially involve marketing, introduction, promotion, offering and sale of investment and financial products and investment opportunities to you on an ongoing basis. Such marketing, promotional and sales activities and related services (“**Services**”) are caught by the broad definition of “direct marketing” and the new requirements on use of personal data in direct marketing under the Ordinance. In order to enable us to provide the Services to you, Our Group is required by the Ordinance to obtain your consent to (i) use your personal data indirect marketing, and (ii) provide or transfer such data to other members of Our Group and other persons described in paragraph (i)(3) of the Policy (“Transferees”) for use by them for direct marketing.

Attached is the Personal Data Privacy Policy of Partners Capital Securities Limited, its holding companies and associated companies (as amended from time to time, the “**Policy**”) which is issued pursuant to the Ordinance, and superseded the information of the “Personal Data Privacy Information” stated in the Securities Trading Agreement of Partners Capital Securities Limited previously.

Pursuant to the Ordinance, Partners Capital Securities Limited hereby give you notice as follows:

- (a) We intent to use and provide or transfer the personal data to the Transferees for direct marketing purpose on or after the date of signing of this declaration.
- (b) The kinds of personal data which we may use and/or transfer cover the data subject's name, contact details, products and other service portfolio information, transaction pattern and behaviour, financial background and demographic data.
- (c) The categories of goods and services that may be used by us or to the Transferees related to (i) investment or financial services/ products and related services and products; (ii) reward, loyalty, privileges or co-branding programmes and related to the above services and products; (iii) services and products offered by our co-branding partners (the names of such co-branding partners will be provided during the events and in the application form of the relevant services and products, as the case may be).

In case of transferring the personal data, we may receive money or other property in return for providing your personal data to the Transferees. For details, please refer to the Policy.

Unless we have received your consent (which includes an indication of no objection), Partners Capital Securities Limited and Our Group will not use your personal data for providing the Services to you and to provide the data to all or any of the Transferees for use by them in marketing those Services.

Declaration

I/We have read and understood the matters mentioned in the above notification and the Policy.

I/We *agree / do not agree to allow your Group to use my/our personal data in direct marketing.

I/We *agree / do not agree to allow your Group to provide or transfer my/our personal data to all or any of the Transferees for use by them in direct marketing those Services.

(* please make your choice, delete if not appropriate)

Client Name : _____

Account Number: _____

Client Signature : _____

Date: _____

內部職員專用 Internal Use only :						
Prepared by		Checked by		Approved by		Remarks
簽署	日期	核實	日期	核准	日期	

Personal Data Privacy Policy of Partners Capital Securities Limited, its holding companies and associated companies (“Our Group”)

From time to time, it is necessary for customers to supply any member of Our Group data in connection with various matters such as account opening or continuation, or establishment or continuation of credit facilities, or provision of financial and/or other services to customers and/or other person (collectively or any one of them, the “Services”). Failure to supply such data may result in Our Group being unable to open or continue such Services.

Data relating to customers collected may be used (whether within or outside Hong Kong) by any members of Our Group as follows:

- Processing of an application for an account and/or the Services;
- the daily operation of the services and credit facilities provided to customers;
- conducting credit checks, matching procedures, data verification, due diligence, risk management;
- internal data processing, preparation of internal analysis and other reports;
- creating and maintaining the Our Group’s credit and risk related models;
- assisting other financial institutions to conduct credit checks and collect debts;
- ensuring ongoing credit worthiness of customers;
- designing financial services or related products for customers;
- marketing services, products and other subjects as described in paragraph (i) below;
- determining the amount of indebtedness owed to or by customers;
- collection of amounts outstanding from customers and those providing security for customers' obligations;
- meeting the requirements to make disclosure under the requirements of any legal and/or regulatory requirements or court orders binding on Our Group; and
- other purposes relating to any of the above.

Data relating to customers held by Our Group will be kept confidential in accordance with the Personal Data (Privacy) Ordinance (“Ordinance”) of the Hong Kong Special Administrative Region unless otherwise specified. Apart from internal use, Our Group may provide such information to the following parties (whether within or outside Hong Kong, “Transferees”):

- any agent, contractor or third party service provider who provides administrative, telecommunications, computer, financial, trade execution, cash, payment, securities and/or contracts clearing or settlement or other services in connection with the operation of business to Our Group;
- any financial institution or dealer with which the customer has or proposes to have dealings;
- any credit reference agencies and in the event of default, to any debt collection agencies;
- any actual or proposed assignee of Our Group or participant or sub-participant or transferee of Our Group’s rights in respect of the customer;
- any exchange, entity, agency, regulatory or government body in any jurisdiction if required by law or pursuant to any court orders, rules or regulations to which Our Group is subject. In such cases, Our Group is usually under a duty of secrecy and will not be able to notify a customer or seek his consent in relation to such release of information;
- Our Group, its holding companies and associated companies;
- third party financial institutions, securities and investment services providers;
- third party reward, loyalty, privileges and co-branding programme providers;
- co-branding partners of the Our Group (the names of such co-branding partners will be provided during the application of the relevant services and products, as the case may be);

- external service providers (including but not limited to mailing houses, telecommunication companies, data processing companies and information technology companies) that Our Group engages for the purposes set out in paragraph (i);
- any party (including but not limited to, any regulatory authorities, tax, law enforcement authorities) entitled thereto by law or regulation (whether statutory or not).

(i) Use of Data in Direct Marketing

Our Group intends to use a customer's data in direct marketing to the members of Our Group and Our Group requires to obtain customer's consent (which includes an indication of no objection) for that purpose. In this connection, customer should take note of the followings:

1. the name, contact details, products and other service portfolio information, transaction pattern and behaviour, financial background and demographic data of a customer held by Our Group from time to time may be used by Our Group in direct marketing;
2. the following classes of services, products and subjects may be marketed:
 - investment or financial services/ products and related services and products;
 - reward, loyalty, privileges or co-branding programmes and related services and products;
 - services and products offered by Our Group's co-branding partners (the names of such co-branding partners will be provided during the application of the relevant services and products, as the case may be);
3. the above services, products and subjects may be provided to the Transferees, including:
 - any member of Our Group;
 - third party financial institutions, securities and investment services providers;
 - third party reward, loyalty, privileges or co-branding programme providers;
 - co-branding partners of Our Group and Our Group's group companies (the names of such co-branding partners will be provided during the application of the relevant services and products, as the case may be);
4. in addition to marketing the above services, products and subjects itself, Our Group also intends to provide the data described in paragraph (i)(1) above to all or any of the persons described in paragraph (i)(3) above for use by them in marketing those services, products and subjects, and Our Group requires the customer's written consent (which includes an indication of no objection) for that purpose;

Our Group may receive money or other properties in return for providing the data to the other persons in paragraph (i)(4) above and, when requesting the customer's consent or no objection as described in paragraph (i)(4) above, Our Group will inform the customer if it will receive any money or other properties in return for providing the data to the other persons.

If a customer does not wish Our Group to use or provide to other persons his/her data for use in direct marketing as described above, the customer may exercise his/her opt-out right by written notice to Our Group.

There may be instances where customers provide personal information to Our Group through electronic means (such as Internet or voice recording system). Whilst Our Group generally uses best endeavors to maintain the security and integrity of its systems, due to many unpredictable traffic or other reasons, electronic communication may not be a reliable medium of communication.

Customers should take heed of such weaknesses and communicate personal information through electronic devices with caution and deem to have accepted taking such risk at his/her own peril voluntarily.

Under and in accordance with the terms of the Ordinance and the Code of Practice on Consumer Credit Data issued under the Ordinance, an individual has the right to:

- check whether Our Group holds data about him and the right of access to such data;
- require Our Group to correct any data relating to him which is inaccurate;
- ascertain policies and practices in relation to data and to be informed of the kind of personal data held by Our Group.
- in relation to consumer credit, to request to be informed which items of data are routinely disclosed to credit reference agencies or debt collection agencies, and be provided with further information to enable the making of an access and correction request to the relevant credit reference agency or debt collection agency; and
- in relation to any account data (including any account repayment data) which has been provided by Our Group to a credit agency, and upon satisfactory termination of the credit by full repayment and on condition that there has been no material default under the credit as determined by Our Group within five years immediately before such termination, to instruct Our Group to make a request to the relevant credit reference agency to delete from its database any account data relating to the terminated credit.

In accordance with the terms of the Ordinance, Our Group has the right to charge a reasonable fee for the processing of any data access request.

This Policy may be revised, amended or supplemented from time to time by Our Group. Our Group has the absolute right on the explanation of all the above mentioned content.

Customers should indicate in the appropriate form or write to the following person or call us if you wish object to the use and/or provision or transfer of their personal data for direct marketing purposes or if customers would like to make a request for access to data or correction of data or for information regarding policies and practices and kinds of data held are to be addressed as follows:

Partners Capital Securities Limited

Room 803B, 8/F, Tower 1, 18 Harcourt Road, Admiralty Centre, Hong Kong

Tel: (852)2157-5400

Nothing in this Policy shall limit the rights of data subjects under the Ordinance.

Note: The English text shall prevail in the event of any inconsistency between the English and Chinese texts.

IMPORTANT NOTICE

By accessing this website or webpage, or signing any of our marketing form of our Group, you are agreeing to the terms of this Policy.