

## 隱私政策

1. 作為高盈國際(香港)金融集團有限公司之客戶(“客戶”),當申請開立或維持帳戶或建立、維持或提供投資、交易或相關服務時,需不時向高盈金融或聯屬公司提供有關之個人資料(“個人資料”)。(《個人資料(私隱)條例》(香港法例第 486 章)(“私隱條例”)所賦予之定義)。
2. 若未能向高盈金融提供有關資料,將會導致高盈金融無法開立或維持戶口或建立、維持或提供投資、交易或相關服務。
3. 個人資料將可能在與高盈金融及/或聯屬公司的正常業務往來過程中被收集。
4. 根據私隱條例的條文,資料將可能用於下列用途:
  - (a) 為提供服務給客戶之日常運作;
  - (b) 作信貸或反洗錢檢查;
  - (c) 確保客戶之信用持續良好及反洗錢風險監控;
  - (d) 宣傳投資、交易或相關服務或產品(詳情請見如下第 8 段);
  - (e) 支援高盈金融在有關服務上作出之任何文件內之任何聲明;
  - (f) 協助其他有關第三者、專業人員、機構及有關監管機構確認某些高盈金融在有關服務上之事實;
  - (g) 根據高盈金融須遵守之有關法例及/或條例要求作出披露;
  - (h) 組成接收資料者所經營業務的紀錄的一部份;
  - (i) 與上述有關或隨附之其他用途。
5. 高盈金融會把個人資料保密,但為達至上述第(4)段所述的用途,高盈金融可能會把個人資料提供給:
  - (a) 任何中間人,或提供與高盈金融業務運作有關服務之第三者服務供應商;
  - (b) 任何對高盈金融作出保密責任之適當人仕,包括對高盈金融作出保密資料承諾的任何聯屬公司;
  - (c) 任何與閣下已有或建議有交易之人仕及機構;
  - (d) 信貸諮詢機構及(發生拖欠付款時)收數公司;
  - (e) 任何管治或與高盈金融及聯屬公司的業務有關的監管機構及交易所;
  - (f) 任何承讓人、受讓人、代表、繼承人或獲轉讓有關帳戶之人士及授權人士;
  - (g) 任何高盈金融之實際或建議受讓人或參與人或附屬參與人或受讓人。
6. 客戶同意個人資料可轉到香港以外的任何地點(不論是用作在香港以外處理、持有或使用該等資料),並同意可轉發給向任何聯屬公司就其業務經營而提供服務的服務提供者。
7. 在法律許可的範圍內,客戶同意高盈金融不時收集的個人資料可按照私隱政策的規定使用及披露。
8. 使用個人資料作直接促銷  
高盈金融擬使用閣下的該等資料作直接促銷,為此高盈金融在使用該等資料前須取得閣下的同意(包括表示不反對)。閣下同意與否

純屬個人意願。就此，務請閣下注意：

- (a) 由高盈金融不時持有的閣下的姓名、聯絡詳情、產品及服務組合信息、交易模式及行為、財務背景及統計資料（「可作直銷用途的個人資料」）可由高盈金融用作直接促銷；
- (b) 可促銷的各類服務、產品及主題如下：
  - i. 財務、保險、證券、商品、投資及相關服務、產品及設施；
  - ii. 上文第(8)(b)(i)條所述各類促銷主題涉及的獎賞、忠誠獎勵或優惠計劃；
  - iii. 由高盈金融的合作品牌夥伴因應上文第(8)(b)(i)條所述各類促銷主題而提供的服務和產品（合作品牌夥伴的名稱見相關服務和產品（視屬何情況而定）申請書）；及
  - iv. 為慈善及/或非牟利目的而作出的捐款及捐獻；
- (c) 上述服務、產品及主題可由高盈金融及/或以下各方提供或（如涉及捐款及捐獻）收集：
  - i. 任何聯屬公司；
  - ii. 第三方金融機構、承保人、證券、商品及投資服務提供者；
  - iii. 第三方獎賞、忠誠獎勵、合作品牌或優惠計劃提供者；
  - iv. 高盈金融的合作品牌夥伴（合作品牌夥伴的名稱見相關服務和產品（視屬何情況而定）申請書）；
  - v. 慈善或非牟利組織；
- (d) 除了自行推廣上述服務、產品及主題外，高盈金融亦擬將上文第(8)(a)條所述資料提供予上文第(8)(c)條所述的全部或當中任何人士（不論提供資料是為得益與否），以供該等人士在促銷上文第(8)(b)條所述的該等服務、產品及主題時使用（高盈金融可能就此收取報酬），而高盈金融須為此用途取得閣下的書面同意（包括表示不反對）；

在未經閣下同意之前高盈金融不會使用閣下可作直銷用途的個人資料進行直接促銷。當簽署相關客戶開戶文件時，請註明閣下同意與否。如閣下在相關開戶文件中表明閣下同意後欲改變意願，希望高盈金融不再使用或向其他人士提供閣下可作直銷用途的個人資料進行上述直接促銷，閣下可向高盈金融發出書面通知或致電高盈金融的客戶服務部（郵寄地址及電話號碼載於下文第(11)條），以行使閣下拒絕參與直銷活動的權利。

但請注意，如閣下是以公司或業務代表身份在相關客戶文件中表明同意參與直接促銷活動，而非以個人身份收取促銷資料，則上述權利並不適用於閣下。

## 9. 收集個人資料聲明-滬深港通北向交易

閣下瞭解並同意高盈金融在為閣下提供滬深港通北向交易的過程中，高盈金融會被要求按有關規則處理客戶個人資料，包括以下各項：

- 1. 在向中華證券通系統（“CSC”）遞交閣下每單北向交易指令時，附加閣下唯一的券商客戶編碼（Broker-to-Client Assigned Number, “BCAN”）/為閣下聯名帳戶編派的券商客戶編碼；及
- 2. 在交易所可能不時依據交易所規則向高盈金融提出要求時，高盈金融將向交易所提供閣下的券商客戶編碼和客戶識別資訊（Client Identification Data, “CID”）

在不局限於高盈金融就處理閣下個人資料曾發予閣下的通知或已從閣下獲得的同意/授權，閣下在此瞭解並同意高盈金融在提供滬深港通北向交易服務過程中可根據需要收集、存儲、使用、披露和轉交與閣下有關係的個人資料，包括如下：

- (a) 不時向交易所和相關的港交所附屬公司披露並轉交閣下的券商客戶編碼和客戶識別資訊，包括在向中華證券通輸入中華通交易時註明閣下的券商客戶編碼，並即時轉送給相關的中華通市場營運者；
- (b) 允許各交易所及相關的港交所附屬公司：
  - i. 為達至市場監督和監測及執行交易所規則之目的，收集、使用和存儲由中華通結算所提供的閣下券商客戶編碼，客戶識別資訊以及任何經整合、驗證和配對的券商客戶編碼和客戶識別資訊（可由上述任何各方或通過香港交易所存儲）；
  - ii. 為達至下文（c）和（d）之目的，不時將有關資料轉交有關中華通市場營運者（直接或經有關中華通結算所）；
  - iii. 向香港監管機構和執法機關披露此類資訊以使其履行就香港金融市場的法定職能；

(c) 允許相關中華通結算所：

- i. 收集、使用和存儲閣下的券商客戶編碼和客戶識別資訊，以便整合及驗證券商客戶編碼和客戶識別資訊，配對券商客戶編碼和客戶識別資訊至投資者識別資料庫，並將經整合、驗證和配對的券商客戶編碼及客戶識別資訊提供給相關的中華通市場營運者，各交易所及相關港交所附屬公司；
- ii. 使用閣下的券商客戶編碼和客戶識別資訊進行其證券帳戶管理的監管職能；
- iii. 將這些資訊披露給具有管轄權的中國內地監管機構和執法機關，以便其就中國內地金融市場履行監管，監督和執法職能；

(d) 允許相關的中華通市場營運者：

- i. 收集、使用和存儲閣下的券商客戶編碼和客戶識別資訊，以便其監督和監測經中華通服務在相關中華通市場的證券交易及執行相關中華通市場營運者的規則；
- ii. 將這些資訊披露給具有管轄權的中國內地監管機構和執法機關，以便其就中國內地金融市場履行監管，監督和執法職能；

如果閣下就任何有關中華通證券的交易向高盈金融發出指示，即表示閣下確認並同意高盈金融為遵守交易所就滬深港通北向交易不時制定的要求及規則使用閣下的個人資料。閣下同時承認，儘管閣下後續可能表示撤回該同意，閣下的個人資料仍可能繼續被存儲，使用，披露，轉移和及為達至上述目的其他方式處理，無論是在該等聲稱的撤回同意之前或之後。

未能提供個人資料或同意的後果

如閣下未能向高盈金融提供閣下的個人資料或上述同意/授權，這可能代表著高盈金融不會或不再能夠執行閣下的交易指令或向閣下提供滬深港通北向交易服務。

10. 根據私隱條例中之條文，任何人有權：

- (a) 審查高盈金融是否持有他／她的資料及查閱有關之資料；
- (b) 要求高盈金融改正有關他／她不準確之資料；
- (c) 查悉高盈金融對於資料之政策及實際運用及被通知高盈金融持有何種個人資料；
- (d) 就客戶信貸而要求獲通知哪項個人資料是例行披露予信貸諮詢機構或收數公司，以及獲提供進一步的資訊以便向有關的信貸諮詢機構或收數公司作出查閱及改正要求。

11. 根據私隱條例規定，高盈金融有權就處理任何查閱資料之要求收取合理費用。任何關於資料查閱或改正資料(當客戶認為由高盈金融所提供有關他／她的資料不準確時)或關於資料政策及實際應用或資料種類之要求，應向下列人仕提出：私隱保護主任 高盈國際(香港)金融集團有限公司，中國香港沙田香港科學園浚湖樓 10W,317-318。

## Privacy Policy

1. As a client of Going International (HK) Financial Group Limited (the "Client"), it is necessary from time to time for the Client to supply his/her personal data ("Personal Data"), within the meaning ascribed in the Personal Data (Privacy) Ordinance (Chapter 486 of the laws of Hong Kong) (the "Privacy Ordinance") to Going Financial or Affiliates when opening or maintenance of accounts, or in the establishment, continuation or provision of investment, dealing or related services.
2. Failure to supply Personal Data may result in Going Financial being unable to open or maintain accounts or establish, continue or provide investment, dealing or related services.
3. Personal Data may also be collected in the ordinary course of continuation of the business relationship with Going Financial and/or Affiliates.
4. Subject to the provisions of the Privacy Ordinance, any Personal Data may be used for the following purposes:
  - (a) the daily operation of the services provided to the Client;
  - (b) conducting credit and/or AML checks;
  - (c) ensuring ongoing credit worthiness and AML risk level of the Client;
  - (d) marketing investment, dealing or related services or products (please see further details in paragraph 8 below);
  - (e) supporting any statements made in any documents in connection with the services of Going Financial;
  - (f) assisting other relevant parties, professionals, institutions or relevant regulatory authorities to verify certain facts in connection with the services of Going Financial;
  - (g) meeting the requirements to make disclosures under the requirements of any laws and/or regulations binding on Going Financial;
  - (h) forming part of the records of the recipient of the data as to the business carried on by it; and
  - (i) any other purposes relating to or incidental to any of the above.
5. Going Financial will keep Personal Data confidential, but Going Financial may provide Personal Data to the following persons in furtherance of the purposes set in the above paragraph 4:
  - (a) any agent or third party service provider who provides services to Going Financial in connection with the operation of its business;
  - (b) an appropriate person under a duty of confidentiality to Going Financial including any Affiliate which has undertaken to keep such information confidential;
  - (c) any person or institution with which the Client has or proposes to have dealings;
  - (d) credit reference agencies and debt collection agencies (in the event of default payment);
  - (e) any regulatory authorities or exchanges which relate to or govern any business of Going Financial and any Affiliate;
  - (f) any assignee, transferee, delegate, successor or person to whom the account of the Client is transferred and the authorized person of the Client; and
  - (g) any of Going Financial's actual or proposed assignee or participant or sub participant or transferee.
6. The Personal Data may be transferred to any place outside Hong Kong, whether for the processing, holding or use of such data outside Hong Kong, and also to service providers which offer services to any Affiliate in connection with the operation of its business.
7. To the extent permitted by law, the Personal Data collected by Going Financial from time to time may be used and disclosed in accordance with the Data Privacy Policy.

## 8. Use of Personal Data in Direct Marketing

Going Financial intends to use your Personal Data in direct marketing and we require your consent (which includes an indication of no objection) before we can use your Personal Data for this purpose. Your provision for this purpose is voluntary. In this connection, please note that:

- (a) your name, contact details, products and services portfolio information, transaction pattern and behavior, financial background and demographic data held by Going Financial from time to time ("Marketing Personal Data") may be used by Going Financial in direct marketing.
- (b) the following classes of services, products and subjects may be marketed:
  - i. financial, insurance, securities, commodities, investment and related services and products and facilities;
  - ii. reward, loyalty or privileges programmes in relation to the class of marketing subjects as referred to in paragraph 8.b.i above;
  - iii. services and products offered by Going Financial's co-branding partners (the names of such co-branding partners can be found in the application form(s) for the relevant services and products, as the case may be) in relation to the class of marketing subjects as referred to in paragraph 8.b.i above; and
  - iv. donations and contributions for charitable and/or non-profit marketing purposes;
- (c) the above services, products and subjects may be provided or (in the case of donations and contributions) solicited by Going Financial and/or:
  - i. any Affiliate;
  - ii. third party financial institutions, insurers, securities, commodities and investment services providers;
  - iii. third party reward, loyalty, co-branding or privileges programme providers;
  - iv. co-branding partners of Going Financial (the names of such co-branding partners can be found in the application form(s) for the relevant services and products, as the case may be); and
  - v. charitable or non-profit making organization;
- (d) In addition to marketing the above services, products and subjects itself, Going Financial also intends to provide the Personal Data described in paragraph 8.a above, whether such provision is for gain or not, to all or any of the persons described in paragraph 8.c above for use by them in marketing those services, products and subjects described in paragraph 8.b above (in respect of which Going Financial may or may not be remunerated), and Going Financial requires your written consent (which includes an indication of no objection) for those purposes;

Going Financial may not use your Marketing Personal Data for direct marketing without your consent. Please indicate your consent when signing Account Opening Form or similar document. If you give your consent but subsequently change your mind and no longer wish Going Financial to use or provide to other persons your Marketing Personal Data for use in direct marketing as described above, you may exercise your opt-out right by notifying Going Financial in writing addressed to the Data Protection Officer in paragraph 11 of this policy.

Please note however that the right to make such a request is not applicable to you if the direct marketing is addressed to you in your capacity as a representative of a company or business and is not sent to you in your individual or personal capacity.

## 9. Processing of Personal Data as part of the Stock Connect Northbound Trading

You acknowledge and agree that in providing our Stock Connect Northbound Trading Service to you, we will be required to:

- 1. tag each of your orders submitted to the CSC with a Broker-to-Client Assigned Number ("BCAN") that is unique to you or the BCAN that is assigned to your joint account with us, as appropriate; and
- 2. provide to the Exchange your assigned BCAN and such identification information ("Client Identification Data" or "CID") relating to you as the Exchange may request from time to time under the Rules of the Exchange.

Without limitation to any notification we have given you or consent we have obtained from you in respect of the processing of your personal data in connection with your account and our services to you, you acknowledge and agree that we may collect, store, use, disclose and transfer personal data relating to you as required as part of our Stock Connect Northbound Trading Service, including as follows:

- (a) to disclose and transfer your BCAN and CID to the Exchange and the relevant SEHK Subsidiaries from time to time, including by indicating your BCAN when inputting a China Connect Order into the CSC, which will be further routed to the relevant China Connect Market Operator on a real-time basis;
- (b) to allow each of the Exchange and the relevant SEHK Subsidiaries to:
  - i. collect, use and store your BCAN, CID and any consolidated, validated and mapped BCANs and CID information provided by the relevant China Connect Clearing House (in the case of storage, by any of them or via HKEX) for market surveillance and monitoring purposes and enforcement of the Rules of the Exchange;
  - ii. transfer such information to the relevant China Connect Market Operator (directly or through the relevant China Connect Clearing House) from time to time for the purposes set out in (c) and (d) below; and
  - iii. disclose such information to the relevant regulators and law enforcement agencies in Hong Kong so as to facilitate the performance of their statutory functions with respect to the Hong Kong financial markets;
- (c) to allow the relevant China Connect Clearing House to:
  - i. collect, use and store your BCAN and CID to facilitate the consolidation and validation of BCANs and CID and the mapping of BCANs and CID with its investor identification database, and provide such consolidated, validated and mapped BCANs and CID information to the relevant China Connect Market Operator, the Exchange and the relevant SEHK Subsidiary;
  - ii. use your BCAN and CID for the performance of its regulatory functions of securities account management;;
  - iii. disclose such information to the Mainland regulatory authorities and law enforcement agencies having jurisdiction over it so as to facilitate the performance of their regulatory, surveillance and enforcement functions with respect to the Mainland financial markets; and
- (d) to allow the relevant China Connect Market Operator to:
  - i. collect, use and store your BCAN and CID to facilitate their surveillance and monitoring of securities trading on the relevant China Connect Market through the use of the China Connect Service and enforcement of the rules of the relevant China Connect Market Operator; and;
  - ii. disclose such information to the Mainland regulatory authorities and law enforcement agencies so as to facilitate the performance of their regulatory, surveillance and enforcement functions with respect to the Mainland financial markets.

By instructing us in respect of any transaction relating to China Connect Securities, you acknowledge and agree that we may use your personal data for the purposes of complying with the requirements of the Exchange and its rules as in force from time to time in connection with the Stock Connect Northbound Trading. You also acknowledge that despite any subsequent purported withdrawal of consent by you, your personal data may continue to be stored, used, disclosed, transferred and otherwise processed for the above purposes, whether before or after such purported withdrawal of consent.

#### Consequences of failing to provide Personal Data or Consent

Failure to provide us with your personal data or consent as described above may mean that we will not, or no longer be able, as the case may be, to carry out your trading instructions or provide you with our Stock Connect Northbound Trading Service.

10. In accordance with the terms of the Privacy Ordinance, any individual has the right to:
- (a) check whether Going Financial holds data about him/her and access to such data;
  - (b) require Going Financial to correct any data relating to him/her which is inaccurate;
  - (c) ascertain Going Financial's policies and practices in relation to data and be informed of the kind of personal data held by Going

Financial; and

- (d) in relation to customer credit, request to be informed which items of Personal 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.

11. In accordance with the Privacy Ordinance, Going Financial has the right to charge a reasonable fee for the processing of any data access request. All requests for access to data or correction of data (when client considers that his/her Personal Data, supplied by the Going Financial following a data access request, are inaccurate) or for information regarding policies and practices and kinds of data held or for exercising your opt out right relating to direct marketing should be addressed as follows: Data Protection Officer, Unit 317-318, 3/F, Lakeside 2, No.10 Science Park West Avenue, Hong Kong Science Park, Shatin, Hong Kong.