

Privacy Policy

Please note that the following Personal Data Privacy Statement is made by GGS (collectively "we", "us", "our") or its affiliates (together "GGS") pursuant to the Personal Data (Privacy) Ordinance of Hong Kong ("Ordinance"). GGS will endeavour to keep Personal Data held by us confidential. Nevertheless, from time to time, it is necessary for you to supply us in connection with various matters such as account opening, provision of services to you, direct marketing or compliance with any legislations/regulations as set down by regulatory authorities. This Statement is intended to inform you why personal data is collected, how it will be used and to whom data access requests are to be addressed. Personal Data comprises all the details GGS holds or collects about you, directly or indirectly, your transactions, financial information, interactions and dealings with GGS, including information received from third parties and information collected through use of our website and our electronic trading services.

Collection of Data

(a) We may collect the data of customers and other individuals in connection with the purposes set out in this Notice. These customers and other individuals may include the following or any of them (collectively "you", "your"):

- applicants for dealing securities services;
- persons linked to a customer or an applicant that is not an individual, including the beneficial owners and officers of that customer or applicant, or in the case of a trust, including the trustees, settlors, protectors and beneficiaries of the trust; and
- other persons who are relevant to a customer's relationship with us.

(b) If the data requested by us is not provided, we may be unable to provide (or continue to provide) products or services to you or to the relevant customer or applicant linked to you.

(c) Data may be:

- i. collected from you directly, from someone acting on your behalf or from another source.

Use of Data

(d) We will use data for the following purposes or any of them (which may vary depending on the nature of your relationship with us):

- i. considering and processing applications for products and services and the daily operation of products and services to be provided to you;
- ii. conducting background checks whenever appropriate;
- iii. creating and maintaining our risk related models;
- iv. designing financial products and services (including securities, commodities, investment, banking and related products and services) for your use;
- v. marketing products, services and other subjects as described in paragraph (f) below;
- vi. determining the amount of indebtedness owed to or by you;
- vii. exercising our rights under contracts with you, including collecting amounts outstanding from you;
- viii. meeting our obligations, requirements or arrangements or those of any member of the GGS, whether compulsory or voluntary, to comply with or in connection with:

1. any law, regulation, judgment, court order, voluntary code, sanctions regime, within or outside Hong Kong existing currently and in the future (“**Laws**”) (e.g. the Inland Revenue Ordinance and its provisions including those concerning automatic exchange of financial account information);
 2. any guidelines, guidance or requests given or issued by any legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations of financial services providers within or outside Hong Kong existing currently and in the future (e.g. guidelines, guidance or requests given or issued by the Inland Revenue Department including those concerning automatic exchange of financial account information) and any international guidance, internal policies or procedures;
 3. any present or future contractual or other commitment with local or foreign legal, regulatory, judicial, administrative, public or law enforcement body, or governmental, tax, revenue, monetary, securities or futures exchange, court, central bank or other authorities, or self-regulatory or industry bodies or associations of financial service providers or any of their agents with jurisdiction over all or any part of the GGS (together the “**Authorities**” and each an “**Authority**”) that is assumed by, imposed on or applicable to us or any member of the GGS; or
 4. any agreement or treaty between Authorities;
- ix. complying with any obligations, requirements, policies, procedures, measures or arrangements for sharing data and information within the GGS and/or any other use of data and information in accordance with any programmes for compliance with sanctions or prevention or detection of money laundering, terrorist financing or other unlawful activities;
 - x. conducting any action to meet our obligations or those of any member of the GGS to comply with Laws or international guidance or regulatory requests relating to or in connection with the detection, investigation and prevention of money laundering, terrorist financing, bribery, corruption, tax evasion, fraud, evasion of economic or trade sanctions and/or any acts or attempts to circumvent or violate any Laws relating to these matters;
 - xi. meeting our obligations or those of any member of the GGS to comply with any demand or request from the Authorities;
 - xii. enabling actual or proposed assignee(s) of all or any part of our business and/or assets, or participant(s) or sub-participant(s) of our rights in respect of you to evaluate the transaction intended to be the subject of the assignment, participation or sub-participation and enabling the actual assignee(s) to use your data in the operation of the business or rights assigned; and
 - xiii. any other purposes relating to the purposes listed above.

Disclosure of Data

(e) Data held by us or a member of the GGS (including our officers, employees, agents and advisers) will be kept confidential but we or a member of the GGS may provide data to the following parties or any of them (whether within or outside Hong Kong) for the purposes set out in paragraph (d) above:

- i. any agents, contractors, sub-contractors or associates of the GGS (including their employees, officers, agents, contractors, service providers and professional advisers);

- ii. any third-party service providers who provide services to us or any member of the GGS in connection with the operation or maintenance of our business (including their employees and officers);
- iii. any Authorities;
- iv. any persons under a duty of confidentiality to us or a member of the GGS which have undertaken to keep such data confidential;
- v. the drawee bank providing a copy of a paid cheque (which may contain data about the payee) to the drawer;
- vi. any persons acting on your behalf whose data are provided, payment recipients, beneficiaries, account nominees, intermediary, correspondent and agent banks, clearing houses, clearing or settlement systems, market counterparties, upstream withholding agents, swap or trade repositories, stock exchanges, companies in which you have an interest in securities (where such securities are held by us or any member of the GGS) or any persons making any payment into a customer's account;
- vii. any persons to whom we are or any member of the GGS is under an obligation or required or expected to make disclosure for the purposes set out in, or in connection with, paragraph (d)(x), (d)(xi) or (d)(xii) above;
- viii. any actual or proposed assignee(s) of ours or participant(s) or sub-participant(s) or transferee(s) of our rights in respect of you;
- ix. any persons giving or proposing to give a guarantee or security to guarantee or secure your obligations to us; and
- x.
 - 1. any member of the GGS;
 - 2. third party financial institutions, insurers, securities and investment services providers;
 - 3. third party reward, loyalty, co-branding and privileges programme providers;
 - 4. co-branding partners of ours or any member of the GGS (the names of such co-branding partners will be provided during the application process for the relevant products and services, as the case may be);
 - 5. charitable or non-profit making organisations; and
 - 6. external service providers that we or any member of the GGS engage(s) for the purposes set out in paragraph (d)(vii) above.

Such data may be transferred in and to a place outside Hong Kong.

Use of Data in Direct Marketing

(f) Where you are a customer, we intend to use your data in direct marketing and we require your consent (which includes an indication of no objection) for that purpose. Please note that:

- i. your name, contact details, products and other service portfolio information, transaction pattern and behaviour, financial background and demographic data held by us from time to time may be used by us in direct marketing;
- ii. the following classes of products, services and subjects may be marketed:
 - 1. financial, insurance, banking and related products and services;

2. reward, loyalty, co-branding or privileges programmes and related products and services;
 3. products and services offered by our co-branding partners (the names of such co-branding partners will be provided during the application for the relevant products and services, as the case may be); and
 4. donations and contributions for charitable and/or non-profit making purposes;
- iii. the above products, services and subjects may be provided by or (in the case of donations and contributions) solicited by us and/or:
1. any member of the GGS;
 2. third party financial institutions, insurers, securities and investment services providers;
 3. third party reward, loyalty, co-branding or privileges programme providers;
 4. co-branding partners of ours or any member of the GGS (the names of such co-branding partners will be provided during the application of the relevant products and services, as the case may be); and
 5. charitable or non-profit making organisations;
- iv. in addition to marketing the above products, services and subjects ourselves, we may provide the data described in paragraph (f)(i) above to all or any of the persons described in paragraph (f)(iii) above for use by them in marketing those products, services and subjects, and we require your written consent (which includes an indication of no objection) for that purpose; and
- v. we may receive money or other property in return for providing the data to the other persons in paragraph (f)(iv) above and, when requesting your consent or no objection as described in paragraph (f)(iv) above, we will inform you if we will receive any money or other property in return for providing the data to the other persons.

According to the Ordinance, if you do not wish us 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 us.

Provision of Another Person's Data

(g) Where you provide to us data about another person, you should give to that person a copy of this Notice and, in particular, tell him/her how we may use his/her data.

Data Access Requests

(h) You have the right:

- i. to check whether we hold data about you and to access such data;
- ii. to require us to correct any data relating to you which is inaccurate;
- iii. to ascertain our policies and practices in relation to data and to be informed of the kind of data held by us; and
- iv. in relation to consumer credit, to be informed on request 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.

(i) In accordance with the provisions of the Ordinance, we have the right to charge a reasonable fee for the processing of any data access request.

(j) You should send requests for access to data or correction of data or for information regarding policies and practices and kinds of data held to:

The Data Protection Officer
GLOBAL GROUP SECURITIES LIMITED

Level 17, 33 Des Voeux Central

31-37 Des Voeux Road Central

Hong Kong

Email: diana.lai@ggs.com.hk

(l) Nothing in this Notice shall limit your rights as a data subject under the Ordinance.

Changes to this privacy policy

This privacy policy may be updated from time to time and should be reviewed regularly.