

Privacy Policy and Personal Information Collection Statement

私隱政策及個人資料收集聲明

This Statement is, except where separate and distinctive statements are provided, applicable to Holly Futures Co., Ltd's group of companies (the "Group"), including but not limited to Holly International Financial Holdings Limited. Accordingly, references to "we", "us", or "our company" shall mean, as the case may be, the relevant companies within the Group.

除另行說明外，本「聲明」適用於弘業期貨股份有限公司各成員機構(「集團」)，其中包括但不限於弘業國際金融控股有限公司。文中「我們」(視乎情況而定)指有關的「集團」成員機構。

Please note that this Statement may be amended from time to time without prior notice. You are advised to check for the latest version on a regular basis. If there is any inconsistency or conflict between the English and Chinese versions of this Statement, the English version shall prevail.

請注意，本聲明事前毋須另行通知即可不時修訂，閣下應定期查閱最新版本。本聲明的英文及中文版本如有不符或互相牴觸，一概以英文版本為準。

1. Privacy Policy Statement

私隱政策聲明

1.1 Our Pledge

我們的承諾

We are committed to safeguard the privacy of individuals with respect to your personal data. We assure that our policies and practices, and those adopted by our affiliated companies and agents in relation to the collection, use, retention, disclosure, transfer, security and access of your personal data comply with the requirements under the Personal Data (Privacy) Ordinance (Chapter 486) (the "Ordinance") under the laws of Hong Kong, as well as the relevant code of practice and guidance issued by the Office of the Privacy Commissioner for Personal Data, Hong Kong. The meaning of the term "personal data" adopted in this Statement is defined in the Ordinance.

我們矢志妥善處理個人資料以保障客戶的私隱。我們將確保我們及各聯營公司及代理就收集、使用、保留、披露、傳輸、保安及存取個人資料所採用的各項政策和實務守則，均符合《個人資料(私隱)條例》(香港法例第 486 章)(下稱「該條例」)，以及由香港個人資料私隱專員公署所發出的相關實務守則及指引之規定。本聲明中「個人資料」乃依照該條例的定義詮釋。

Where our operations are subject to privacy legislation other than that of Hong Kong (such as due to our carrying out of operational functions outside of Hong Kong), this Statement shall apply so far as it is consistent with such local legislation.

如我們任何營運業務需遵從香港境外任何其他私隱法例(例如在香港境外營運)，則只要不牴觸相關地方的法例，本聲明亦會適用。

1.2 Collection of personal data

收集個人資料

At times, you may be required to provide your personal data including, but not limited to, your name, gender, date of birth, identity document number and/or its copy, telephone number, fax number, location, postal address and/or its proof, email address, credit card information, bank account number etc. Refusal to provide such information may render us unable to handle any

application or request you are making, or may deny you access to certain parts of our websites, or may otherwise defeat the objectives of your visit. If you are under the age of 18, consent from your parent or guardian is required before you provide us with any personal data.

我們或會不時要求閣下提供個人資料，包括但不限於閣下的姓名、性別、出生日期、身份證明文件號碼及/或副本、電話號碼、傳真號碼、位置、郵寄地址及/或其證明、電郵地址、信用卡資料、銀行賬號等。如閣下拒絕提供此等資料，可能令我們無法辦理閣下提交的任何申請或要求，又或使閣下無法存取我們的網站某些內容，又或導致閣下無法完成原擬在我們的網站辦理的事宜。如閣下尚未成年滿 18 歲，必須獲得家長或監護人同意，方可向我們提交任何個人資料。

When you visit our websites, we will record your visit only but will not collect any personal data from you unless otherwise stated. Cookies used (if any) in any part of our websites will not be deployed for collecting personal data. For your information, Cookies are small computer files that can be stored in web surfers' computers for the purposes of obtaining configuration information and analyzing web surfers' viewing habits. They can save you from registering again when re-visiting a website and are commonly used to track your preferences in relation to the subject matter of the website. You may refuse to accept Cookies by modifying the relevant Internet options or browsing preferences of your computer system, but to do so you may not be able to utilize or activate certain available functions in our websites. Our websites may bar users who do not accept Cookies.

除另行說明，否則閣下瀏覽我們的網站時我們只會收集閣下到訪的記錄，而不會收集閣下任何個人資料。我們的網站任何部份所設的 Cookies(如有)不會用於收集個人資料。Cookies 是可保存於網頁使用者電腦內的小型電腦檔案，功能是獲取配置資料及分析網頁使用者的瀏覽習慣。使用者儲存 Cookies 後，再次瀏覽網站便不必重新註冊。網站常會用 Cookies 追蹤使用者喜好的網站主題，閣下可修改相關的互聯網選項或電腦系統的瀏覽喜好設定，拒絕儲存 Cookies，然而閣下可能因此無法使用或啟動我們的網站提供的某些功能。我們的網站可能會攔截不接受 Cookies 的使用者。

Calls between you and our Customer Service may be recorded for the purposes of staff training, improvement of service quality and clarification of contractual issues.

為協助培訓員工、改善服務質素及釐清合約事宜，閣下致電我們顧客服務部的對話可能會被錄音。

1.3 Accuracy of personal data

提供真確個人資料

Your application for our online account opening may be subject to credit assessment and verification of your personal details. If we regard results of such checking is unsatisfactory, we will not enter into an agreement with you. Under certain circumstances, data provided by you will be validated by using generally accepted practice. We may also require you to show the original documentation before the data may be used, such as personal identification document and/or proof of address.

閣下向我們申請網上開戶服務，我們可能會進行信貸評估及核實你的個人資料。假如查核結果不符合要求，我們恕不會與閣下訂立合約。於某些情況下，我們會採用市場普遍接受的慣用方法核實你提供的資料。此外，我們亦可要求閣下出示個人身份證明文件及/或地址證明等文件正本，相關資料經核對無誤後方始使用。

1.4 Use of personal data collected

收集所得個人資料的用途

有關閣下的個人資料的具體用途已列載於以下我們的「個人資料收集聲明」第 2 部份(其中特別以第 2.1 部份第一段(i)至(viii)項為主要部分)。

1.5 Data access and correction

當事人查閱及修正資料

Under the Ordinance, you have the right to:

根據該條例，閣下有權：

- i. Check whether we hold any of your personal data;
查詢我們是否持有閣下的個人資料；
- ii. Access your personal data held by us;
查閱我們記存的閣下個人資料；
- iii. Request us to correct any inaccurate personal data held by us; and
要求我們更正所記存不正確的個人資料；及
- iv. Ascertain our policies and practices established (from time to time) in relation to personal data and the types of personal data held by us.

查證我們(不時)就個人資料及持存個人資料類別制訂的政策和實務守則。

If you want to access and/or correct your personal data which you have given us via application form, internet or other means, or if you want to ascertain our policies and practices in relation to personal data and the kind of your personal data held by us, please contact our Data Protection Officer in writing, we will respond within 40 days after receiving the request. We may charge you a reasonable fee for each personal data access. However, such fee will be waived if the data access is made for the purpose of correcting your personal data.

閣下如欲查閱及/或修正閣下透過申請表格、互聯網或其他途徑向我們提交的個人資料，又或查詢我們的個人資料政策和實務守則，以及我們所持閣下之個人資料類別，一律請以書面提交予我們的資料保護主任，我們將於接獲通知後 40 天內作出安排。每次成功查閱後，我們可能會收取合理的手續費。然而若查閱是為修正資料，該手續費將可獲豁免。

1.6 Security of personal data

個人資料保安

We use various encryption techniques to transmit via the Internet your personal data, which can only be accessed by our authorized personnel. Given the operational nature of the Internet, we cannot guarantee that the transmission is fully secure. Please refer to our “Security Statement” in Part 3 below for details on the steps that we have taken to ensure that any personal data collected by us via our websites is safe and secure to avoid unauthorized interference by third parties.

我們經互聯網傳輸閣下的個人資料時會採用各種加密技術，確保只有我們授權的人員可存取資料。基於互聯網的運作性質，我們不能保證資料傳輸絕對安全。閣下可參閱以下第 3 部份「安全聲明」，以了解我們於保護經本網站收取的個人資料安全和避免遭受第三者非法干擾所採取之步驟。

1.7 Internal Guidelines on Record Retention and Access to Personal Data

關於存取個人資料的內部指引

Our staff are required to strictly adhere to our Internal Guidelines on Record Retention and Access to Personal Data. Physical records containing personal data are securely stored in locked areas when not in use. Access to such physical and/or computer records is strictly controlled and requires management approval for each access. Approvals for access to customers' personal data are granted only on a "need to know" basis. Where we retain, use and/or transmit customers' personal data, we have put in place adequate measures to protect it from accidental and/or unauthorized disclosure, modifications, loss and/or destruction.

我們所有員工均嚴格遵守「存取個人資料內部指引」。載有個人資料的實物記錄如非使用時一律存放於鎖上的安全地點。我們嚴格管制員工存取實物及/或電腦資料，每次存取均需獲得適當的管理人員批准，而只有「必須知情」的人員才會獲准存取顧客的個人資料。我們記存、使用及/或傳輸顧客的個人資料時，必會採取適當的措施，防止意外及/或未經許可披露、更改、遺失及/或銷毀任何個人資料。

1.8 Retention of personal data

保留個人資料

If you are a customer of ours, your personal data which you have given us via application form, internet or other means, during the service subscription period will be retained for a reasonable period after termination of your subscription. We will erase any unnecessary personal data from our system in accordance with our internal policy.

如閣下是我們的客戶，閣下在服務有效期間透過申請表格、互聯網或其他途徑向我們提供的個人資料，將會一直保留至服務終止後一段合理時間。我們會依照內部政策清除系統現存的不必要個人資料。

2. Personal Information Collection Statement

個人資料收集聲明

- 2.1 As a customer of our company, or a visitor or user of our website(s), it may be necessary for you to provide us with your personal data when you apply to us and/or continue to subscribe with us for any service and/or product. If your personal data is incomplete or incorrect, we may not be able to provide or continue to provide the services to you. We shall keep your personal data confidential at all times. Our policies and practices with respect to the collection, use, retention, disclosure, transfer, security and access of personal data will be in accordance with requirements under the Ordinance and this Statement. We may use and retain the personal data provided by you for the following purposes and for other purposes as shall be agreed between you and us or required by law from time to time:

閣下作為我們的客戶或我們網站的訪客或使用者，向我們申請及/或持續使用任何服務及/或產品時，或須向我們提供個人資料。若閣下提供的個人資料不全或失實，我們可能無法向你提供或繼續提供所需的服務。我們時刻均會保密閣下的個人資料。我們收集、使用、保留、披露、轉移、保安和查閱個人資料的政策及實務守則，一律遵從該條例及本聲明的規定。我們可使用和保留你提供的個人資料作以下任何用途，以及作雙方不時協定或法律規定的其他用途：

- i. Processing of your service application, and provisioning of the services;
辦理閣下的服務申請及提供服務；
- ii. Subject to your consent, we may use your personal data (including name, gender, telephone number, fax number, location, postal address, email address, month and year of birth, as well as

the information on usage of telecommunications and related telecommunications value-added services and relevant account and service numbers) for marketing the categories of goods and/or services as set out in the customer consent form which may be subject to change from time to time (irrespective of whether we are remunerated for such marketing activities) relating to us, our affiliated companies and business partners. We may dispatch to you the promotional information via direct marketing telephone calls, e-mail, e-message¹, facsimile, direct mailings etc.

在閣下同意的情况下，使用閣下的個人資料(包括姓名、性別、電話號碼、傳真號碼、位置、郵寄地址、電郵地址、出生年月、以及電訊和有關電訊增值服務的使用資料、賬戶及服務號碼)推銷不時訂立於客戶同意書有關我們、我們的聯營公司及合作夥伴之服務及/或產品類別(不論本公司有否就推廣收取報酬)。我們會以直銷電話、電郵、電子訊息¹、傳真、郵件等方式向閣下提供有關推廣資料；

- iii. **Processing of any benefits for you arising out of the services and carrying out market research to enhance service quality or experience;**

辦理因應各項服務而向閣下提供的相關優惠及作市場研究以提升服務質數或體驗；

- iv. **Analyzing, verifying and/or checking of your credit, payment and/or account status in relation to the provision of the services;**

就提供服務而分析、核實及/或查核閣下的信用、付款及/或賬戶狀況；

- v. **Processing of any payment instructions, direct debit facilities and/or credit facilities requested by you;**

辦理閣下要求的任何付款指示、直接支賬付款安排及/或信貸；

- vi. **Facilitating the daily operation of your account, provisioning of customer services and/or the collection of overdue amounts in your account in relation to the services;**

促進閣下賬戶日常運作、提供顧客服務及/或收取閣下賬戶尚欠的服務收費；

- vii. **Enabling us to perform any obligations on interconnection or conform with other industry practices, or to comply with any requests stipulated by governmental or regulatory authorities; and**

履行我們任何連接通訊的責任或遵守其他業界規則，或遵從政府機構或規管當局頒令的要求；及

- viii. **Enabling us in prevention of crime.**

讓我們能防止罪行的發生。

¹ E-message means electronic messages delivered via the following means: mobile short messaging service (SMS) / multimedia messaging services (MMS) / cross-platform mobile messaging application (e.g. smartphone messaging application).

電子訊息包括經以下途徑發出之訊息：手機短訊、多媒體訊息或跨平台流動短訊應用程式（例：智能手機短訊應用程式）。

2.2 We may disclose and transfer (whether in Hong Kong or overseas) your personal data to the following parties to use, disclose, process or retain your personal data for the purposes mentioned above:

我們可向(不論在香港或海外)下列各方披露及轉移閣下的個人資料，並可就以上目的使用、披露、處理或保存閣下的個人資料：

- i. **Our agents and contractors (including IT, network, customer service, sales agents and contractors), any service providers for the provision of our services;**

我們的代理及承辦商(包括資訊技術、網絡、客戶服務、銷售代理及承辦商)、任何服務供應商就提供有關服務；

- ii. **Our affiliated companies and business partners;**

我們的聯營公司及合作夥伴；

- iii. Banks, financial institutions and credit providers;
銀行、財務機構及信貸供應商;
- iv. Debt collection agencies, credit reference agencies and security agencies;
追收欠款公司、信用調查機構及保安代理;
- v. Regulatory bodies, law enforcement agencies and courts; and
規管當局、執法機構及法院; 及
- vi. Our professional advisers.
我們的專業顧問。

2.2 If at any time in the future you do not wish to receive direct marketing promotional information from us with respect to the telecommunication and/or other categories of products/services mentioned above, or do not wish us to disclose, transfer or use your personal data for the aforesaid direct marketing purposes, please contact our Customer Service Hotline 25298203 to update the instruction. You may also inform us by write a letter in the subject matter of "Opt Out Direct Marketing Application" to our Customer Service Department either in person to our office or by post: Room 2003-05, 20/F Jubilee Centre, 46 Gloucester Road, Wanchai, Hong Kong.

如閣下日後不希望收到我們所發送有關電訊及/或上述其他類別之產品/服務之直銷宣傳推廣資料, 或不希望我們披露、轉移或使用閣下的個人資料作上述直銷用途, 請致電我們的客戶服務熱線 25298203 更新指示, 閣下亦可發「申請停止直接市場推廣」的信, 並親上門遞交或郵寄至: 香港灣仔告士打道 46 號捷利中心 20 樓 3 至 5 室客戶服務部收。

3. Security Statement

安全聲明

While internet is not an inherently secure environment for communications, security of internet communications can be enhanced by the application of appropriate technology. However, internet security is not solely a technical issue, knowledge on security of personal and transaction data as well as general measure are equally important. "Hackers" could only attack a system through a "door". However, in most cases imprudent transmission and handling of sensitive data such as confidential documents, password, and personal identifiers etc. would facilitate unauthorized access to such a "door" by "hackers". Hence, internet users should be cautious when handling such kind of sensitive documents and data.

儘管互聯網在本質上並非安全可靠的通訊環境, 但用戶可運用適當的技術加強網絡安全性。然而, 互聯網的安全並非純粹「技術」問題, 個人及交易數據的保安常識及一般措施亦同樣重要。「黑客」需要有「門戶」才能入侵系統, 而「門戶」大開往往是因為用戶傳遞機密文件或處理密碼、個人識別代碼等機密數據時疏忽大意, 以致「黑客」有機可乘。因此用戶處理這類文件和數據時務需小心謹慎。

In order to prudently preserve all personal data obtained from users of our websites, apart from firewalls and other sophisticated technical facilities, we also provide and maintain other stringent security measures so as to protect our system as well as the information and data retained therein from accidental or malicious destruction or damage.

為嚴格保密從我們網站用戶獲取的所有個人資料, 除使用防火牆和其他精密技術性設備外, 我們還提供及設有其他嚴格的保安措施, 以保護我們的系統、資料和數據, 避免任何意外、惡意破壞或損毀。