

Personal Information Collection and Privacy Policy Statements

Please read thoroughly the following statements before your provision of any personal data.

Customers are required to provide AP Capital with data from time to time, in connection with the opening or maintenance of accounts, establishment or continuation of credit facilities, and provision of financial and/or other services. Failure to provide such data may result in AP Capital being unable provide the abovementioned services.

Data maybe collected from customers in the ordinary course of their continuation of business relationship with AP Capital.

Providing data to AP Capital through electronic means (such as Email, Internet or voice recording system) cannot be guaranteed to be completely secure. AP Capital will not be responsible for any damage suffered by customers if they send any information to AP Capital through electronic devices or vice versa. Customers should thus take note of such weaknesses and transmit personal data through electronic means with extra caution.

AP Capital will not collect any personal data that identifies a visitor to this website unless otherwise specified. Customers visiting this website may only be recorded with the Domain Name Server, part of your email address and the pages visited. Such information will be used to prepare aggregate information about the number of visitors to the website and general statistics on usage patterns of the website.

The purposes for which data relating to customers may be used (whether within or outside Hong Kong) are as follows:

- a) the daily operation of the services and credit facilities provided to customers;
- b) conducting credit checks;
- c) assisting other institutions to conduct credit checks;
- d) ensuring ongoing credit worthiness of customers;
- e) designing financial services or related products for customers' use;
- f) marketing financial services or related products;
- g) determining the amount of indebtedness owed to or by customers;
- h) meeting the requirements to make disclosure under the requirements of any legal and/or regulatory requirements or court orders binding on AP Capital; and
- i) other purposes relating to any of the above.

Use of Data in Direct Marketing

AP Capital intends to use and/or transfer the customer's data to any group companies of itself for direct marketing and AP Capital requires the consent (which includes an indication of no objection) from the customer for that purpose. 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 AP Capital from time to time may be used by AP Capital in direct marketing;
- b) The following classes of services, products and subjects may be marketed:
 - i. securities, commodities, investment and related services and products;
 - ii. reward, loyalty or privileges programmes in relation to the class of marketing subjects as referred to in clause b(i) above; and
 - iii. donations and contributions for charitable and/or non-profit making purposes.
- c) If a customer does not wish AP Capital to use and/or transfer the his data for use in direct marketing, he may, without charge, exercise the right to opt-out.

Data held by AP Capital relating to a customer will be kept confidential. AP Capital may nonetheless provide such information to the following parties (whether within or outside Hong Kong):

- a) any agent, contractor or third-party service provider who provides administrative, telecommunications, computer, financial, trade execution, cash, securities and/or contracts clearing or settlement or other services to AP Capital in connection with the operation of its business;
- b) any other person under a duty of confidentiality to AP Capital including group companies of AP Capital which has undertaken to keep such information confidential;
- c) any financial institution or dealer with which the customer has or proposes to have dealings;
- d) any credit reference agency and in the event of default, any debt collection agency;
- e) any actual or proposed assignee of AP Capital or participant or sub-participant or transferee of the rights of AP Capital in respect of the customer; and
- f) 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 AP Capital is subject. In such cases, AP Capital is usually under a duty of secrecy and will not be able to notify the customer or seek his consent in relation to such release of information.

In accordance with the relevant terms of the Personal Data (Privacy) Ordinance (Cap. 486) (the “Ordinance”), an individual has the right to:

- a) check whether AP Capital holds data about him and the right of access to such data;
- b) require AP Capital to correct any incorrect data relating to him; and
- c) ascertain AP Capital's policies and practices in relation to data and to be informed of the kinds of personal data being held.

Requests in relation to exercising the above right can be addressed to:

Personal Data Officer
AP Capital Management (Hong Kong) Limited
1217 Central Building, 1 – 3 Pedder Street, Central, Hong Kong
Fax: +852 3910 1032
Email: info@apcapitalinvestment.com

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

In addition to AP Capital's duty of confidentiality to customers, AP Capital shall at all times observe the above privacy principles and the Ordinance in collecting, maintaining and using the personal data of customers. AP Capital's policy in relation to personal data may be revised, amended or supplemented from time to time.