

# 個人資料私隱政策聲明

## Personal Data Privacy Policy Statement

本私隱政策聲明（「**本聲明**」）說明中信期貨國際有限公司（「**中信期貨國際**」）、信期國際證券有限公司（「**信期證券**」）及其關聯公司（以下統稱為「**信期香港**」，「**本公司**」或「**我們**」）如何收集和處理從客戶、擔保人、抵押品提供者和其他人士（以下統稱為「**您**」，如果您是個人，則稱為「**資料當事人**」）收集到的個人資料/個人信息。如果您不是自然人，在適用的情況下，提及「**您**」可能指資料當事人是其個人資料所涉及的自然人。

This Privacy Policy Statement (the “**Statement**”) explains how CITIC Futures International Company Limited (“**CFI**”), CF International Securities Company Limited (“**CFIS**”) and its Affiliates (collectively referred to as “**CFHK**”, “**we**” or “**us**”) collect and process personal data/personal information collected from Customers, guarantors, security providers and other individuals from time to time (collectively referred to as “**you**” or if you are an individual, “**Data Subject**”). Where you are not a natural person, where applicable, a reference to “**you**” may refer to the Data Subject being the natural person whose personal data are involved.

我們致力於按照要求的標準處理您的資料。這包括根據適用的隱私保護法律保護您的隱私並確保您的資料安全，其中包括，《個人資料（私隱）條例》（香港法例第 486 章）（「**個人資料（私隱）條例**」）、中國的《中華人民共和國個人信息保護法》（「**個人信息保護法**」）和歐盟的《一般資料保護規範》（「**一般資料保護規範**」）（統稱為「**資料保護法**」）。

We are committed to processing your Data in accordance with the required standards. This includes protecting your privacy and ensuring the security of your Data in compliance with applicable privacy protection laws, in particular and where applicable, the requirements of the Personal Data (Privacy) Ordinance (Chapter 486 of the Laws of Hong Kong) (“**PDPO**”), the Personal Information Protection Law of the People’s Republic of China in China (“**PIPL**”) and the General Data Protection Regulation in Europe (“**GDPR**”) (collectively referred as the “**Date Protection Laws**”).

所有載於本附件中定義的詞語，如未另行定義，應具有可能會不時修改或補充的《證券買賣條款》，視乎情況或（就中信期貨國際而言）《期貨及期權買賣條款》和其他客戶與本公司之間的其他相關協議內注明的同意思。

Capitalized terms that are not otherwise defined in this Appendix shall have the same meaning in the Terms and Conditions for Securities Trading, as the case may be, or (in the case of CFI) the Terms and Conditions for Futures and Options Trading (each, a “**Terms and Conditions**”), and/or other relevant agreements between the Customer and CF, as may be amended or supplemented from time to time.

### 1. 我們收集的資料

#### **Personal Data We Collect**

就本聲明的目的，“**資料**”是指任何指以電子或其他方式記錄並已識別或可識別的自然人有關的各種個人信息，從中可以直接或間接確定個人身份，但不包括已匿名化的信息。

For the purpose of this Statement, “**Data**” means all kinds of personal information which relates to identified or identifiable natural persons that are electronically or otherwise recorded, and from which it is practicable for the identity of the individual to be directly or indirectly ascertained. It does not include information that has been anonymized.

信期香港會收集、保存、處理、披露、轉移及刪除各種類型的個人資料。從廣義上來說，資料會包括（但不限於）以下各項：

At CFHK, we collect, save, use, process, disclose, transfer and delete different kinds of Data. Broadly speaking, the Data will include (without limitation) the following:

資料類型 Type of Data	描述 Description
識別資料和認證資料 Identification data and authentication data	姓名、出生日期、出生地、性別、身份證/護照號碼和複印件以及（如果適用）婚姻狀況、家庭成員、稅務居民、與整治公眾人物的關係、簽名樣本、照片、人臉識別信息 Name, date of birth, place of birth, gender, ID/passport number and copies and (if applicable) marital status, family members, tax residence, relationships with politically exposed persons, sample signature, photographs, face recognition information
聯絡方式 Contact	住址、郵寄地址、電話號碼、傳真號碼、電郵地址 Home address, mailing address, telephone numbers, fax number, email address
財務 Financial	就業/業務信息、銀行賬戶信息、信譽資料、董事職位（如適用）、年收入、估計淨值、財富來源、資金來源、與金融資產組合相關的證明 Employment/business information, bank account information, creditworthiness data, directorships (if applicable), annual income, estimated net worth, source of wealth, source of funds, origin of assets, proof relating to portfolio of financial assets
投資 Investment	投資經驗、投資目標、投資標的、預期交易活動、風險承受能力、產品認識 Investment experience, investment objective, investment target, anticipated level of activity, risk profile, product knowledge
服務/交易相關 Services/Transactional	有關訂單、指令、交易、服務、銀行賬戶、戶口、付款和匯款的服務/交易等的詳情 Details about orders, instructions, transactions, services, bank accounts, securities accounts, payments and remittances
平台使用 Usage	有關使用本公司的網站、在綫平台、流動應用程式的信息 Information about use of our website, on-line platforms, mobile applications
用戶信息 Profile	用戶名和密碼、反饋和調查回覆 Usernames and passwords, feedback and survey responses
Cookies/日誌/緩存/像素標記 Cookies/logs/cache/pixel tags	訪客的姓名、電子郵件地址、MAC 地址、IP 地址（和域名）、設備的技術、瀏覽器軟件、其瀏覽器的類型和配置、語言設定、地理位置、操作系統、引薦網站、瀏覽的頁面和內容，以及瀏覽時間 A visitor's name, email address, MAC addresses, IP addresses (and domain names), browser software, types and configurations of his/her browser, language settings, geolocations, operating systems, referring website, pages and content viewed and durations of visit
內部監控 Internal control	來自姓名篩查、信用審查、背景審查、專業資格查核、負面新聞審查、電子認證等各項資料 Data from name-screening, credit-checks, background checks, professional qualifications, negative news checks and electronic certification

視聽 Audio visual	閉路電視錄像、照片、錄音記錄 CCTV footage, photographs, tape recordings
客戶盡職調查以遵守法律/法規 Customer due diligence for the compliance of laws/regulations	在客戶盡職調查、制裁或反洗錢調查、背景審查結果、推薦人及其聯繫方式、潛在/存在的利益衝突、與我們的通信和其他通信（視頻和音頻記錄、通話記錄、通信和其內容） Personal Data collected during customer due diligence, sanctions or anti-money laundering checks, background vetting results, referees and their contact method, potential/existing conflict of interests, correspondence and other communication with us (video and audio record, call log, correspondence and its content)

本公司僅在相關資料當事人同意我們處理此類信息或自願向我們提供此類信息或資料保護法要求或允許收集的情況下收集特殊類別的個人資料或敏感個人信息（其定義請參考相關司法管轄區適用的個人資料法律或資料保護法）。此類信息包括（但不限於）關於個人生物識別資料、基因資料、宗教或哲學信仰、政治觀點、特定身份、醫療保健、財務賬戶、個人行踪、未滿十四歲的未成年人的個人信息、工會的個人信息會員資格、有關健康的資料或有關自然人性生活或性取向的資料（「**敏感信息**」）。

CFHK only collects special categories of personal data or sensitive personal information (as provided by any applicable Data Protection Laws in the relevant jurisdiction(s) when the relevant Data Subject agrees to our process such personal information or voluntarily provide us with this information or it is required or permitted to be collected by Data Protection Laws. Such information includes (without limitation) personal information regarding a person's biometric data, genetic data, religious or philosophical beliefs, political opinions, specific identity, health care, financial accounts, personal whereabouts, personal information of minors under the age of fourteen, trade union membership, data concerning health or data concerning a natural person's sex life or sexual orientation (the "**Sensitive Information**").

向本公司提供敏感信息時，請酌情決定，在任何情況下都不要向本公司提供敏感信息，除非您因此同意本公司出於其合法業務目的處理敏感信息，或者除非適用法律法規或法庭命令允許。透過接受本聲明，即表示您自願並明確同意本公司及/或向本公司確認資料當事人的同意其敏感信息將用於本聲明中所述的目的。如果您對向本公司提供的敏感信息是否或可能是必要以適合特定目的有任何疑問，請聯繫本公司。

Please use your discretion when providing Sensitive Information to CFHK, and under any circumstances, do not provide Sensitive Information to CFHK, unless you thereby consent to CFHK's process of Sensitive Information for its legitimate business purposes or unless it's permitted by applicable laws and regulations or court orders. By accepting to this Statement, you are voluntarily and explicitly consent to CFHK and/or confirm to CFHK that consent of the Data Subject whose Sensitive Information are received and provided to CFHK for processing has been obtained for purposes described in this Statement. If you have any questions about whether the provision of Sensitive Information to CFHK is, or may be, necessary or appropriate for particular purposes, please contact CFHK

## 2. 我們如何收集資料

### How We Collect Data

本公司可以在與您接觸/建立關係的過程中收集資料；例如，當您向本公司提供其名片或聯繫方式、存入資金或證券、通過本公司進行交易、轉移資金或證券、操作證券戶口、與本公司的員工或客戶經理

討論事務或聯繫本公司以安排孖展貸款或其他服務、洽談業務、更改/更新/改正資料當事人的資料或其他戶口資料。

We may collect the Data from you during contact or in the ordinary course of your relationship with us, for example, when you give us your name card or contact details, deposit funds or securities, effect transactions through CFHK, transfer funds or securities, operate the Securities Account, discuss matters with CFHK's staff or account executives or contact CFHK to arrange margin facilities or other services, negotiate business with CFHK, or amend /update/correct your Data or other account information.

我們也可以透過各種方式從您收集資料，例如：

We may also use various methods to collect Data from you, such as:

方法 Method	描述 Description
直接要求 Direct request	本公司與資料當事人的接觸/關係的各個階段都需要各種資料。例如，當客戶在本公司開設賬戶、進行交易、協助本公司進行各種審查時，本公司都會要求客戶向本公司提供各種資料。在某些情況下，如果客戶未能提供，可能會導致本公司無法開立或維持賬戶、進行交易、授予或繼續提供孖展貸款便利或其他服務。 We request various Data at various stages of our relationship with you. For example, Customers are required to provide us with various Data when opening account with us, conducting transactions, or enabling us to conduct various checking. Under certain circumstances, failure to do so may result in CFHK being unable to open or maintain the accounts, effect any transactions, grant or continue margin facilities or provide any services to the Customer
電子 Electronic	本公司的系統會使用、傳輸、監察、記錄和以其他方式處理包含資料並且通過本公司的電子系統、在綫平台、流動應用程式（包括電子郵件）傳遞的各種信息。 Our systems will use, transfer, monitor, record and otherwise process communications containing Data passing through our electronic systems, on-line platforms, mobile applications in any form, including emails.
通訊 Correspondence	通過電子郵件/郵寄或其他方式與本公司通信時，本公司也會收集資料。 We also collect Data when you communicate with us by email/post or other means.
電話 Telephone	本公司會記錄與資料當事人的電話交談，以進行監管、內部監控、風險管理和審計。 We may also record our telephone conversations with you for regulatory, internal control, risk management and audit purposes
Cookies/日誌/緩存/像素/標記 Cookies/logs/cache/pixel tags	有關訂單、指令、交易、服務、銀行賬戶、戶口、付款和匯款的服務/交易等的詳情 Details about orders, Instructions, transactions, services, bank accounts, securities accounts, payments and remittances
第三方服務供應商 Third party vendors	本公司要求和接收第三方服務供應商提供的各種資料。這些供應商提供的服務會包括身份鑒別、姓名篩查、電子認證、背景審查和信用審查。 We request and receive various Data from third party vendors who provide services regarding name-screening, electronic certification, background checks

	and credit checks.
公開途徑 Public sources	本公司也會通過公開途徑（例如，政府註冊機構、專業機構、監管機構、制裁名單、公開信息門戶網站/資料庫、社交媒體和互聯網上的各項服務）索取資料。  We also access Data through publicly available sources e.g. government registries, professional bodies, regulators, sanction lists, public disclosure portals/data base, social media and services on the Internet.

### 3. 收集資料的目的

#### Purposes for Collecting Data

信期香港可以因以下一種或多種目的不時收集、保存、處理、披露、轉移及刪除閣下之資料：

- a) 開立和維持戶口；
- b) 致使閣下就有關交易或其他事項所發出之指令生效，及執行閣下之其他指示；
- c) 賬戶日常運作、提供服務、審批孖展貸款予您或借款人（當您是該項授信的擔保人或抵押品提供者時）；
- d) 遵守法規和內部對客戶盡職調查、核查和持續審查、防止和發現洗錢、恐怖分子籌集和其他非法或不正當活動、欺詐檢測、制裁監控等相關的要求；
- e) 遵守法院諭令和約束信期香港、其關聯公司、中信期貨有限公司、中信証券股份有限公司（「**中信証券**」）或他們所屬集團公司或任何其他人士之任何法律規定、監管、要求 或安排，包括但不限於香港政府與其他外國政府之間的條約、協議、對等原則和其他安排（包括與稅收 報告和自動交換財務賬戶資料的相關安排）；
- f) 回應公共或政府機構（可能包括但不限於監管機構、執法機關、證券交易所或其他類似機構或機關、稅 務局、醫院管理局、社會福利部門以及香港及其他地區的其他機構）以配合其查詢或調查要求；
- g) 對閣下進行信貸查詢或調查及查明閣下之財政狀況、持續信貸狀況及投資目標，以及容許或協助任何其他人士進行上述事項；
- h) 制訂和維護您的信用歷史記錄、信用評分模型和其他分析（無論他們與任何信期香港之間是否存在任何關係），以供現在和將來參考；
- i) 進行合規審查、風險管理、內部監控和審計（包括審查和監控賬戶活動、交易、孖展和其他頭寸和資料 以及進行審計（內部和外部））；
- j) 客戶關係管理和相關資料處理；
- k) 查明和了解客戶的投資經驗、投資目標、財務狀況、投資年期、風險承受水平、流動性需求、分散投資 的需求和其他相關情況；
- l) 為客戶設計金融產品或服務供客戶使用；
- m) 回答對手方、產品發行人/擔保人、代理商、分銷商、集體投資計劃或其經理、管理人、投資經理、信托人、托管行、保管代理人、其他托管行或代理人或上述各機構的代名人或關聯公司的提問，並提供給 他們資料以便他們追討欠款和損失、維護其他權利或回答監管機構、證券交易所或政府/司法機關的查詢；
- n) 為中信期貨國際、信期證券或其任何附屬公司之現有及日後之服務或產品（例如金融服務或產品）進行直接促銷及市場推廣，無論信期香港會否從中獲得報酬（請參考下面有關“**直接促銷**”的部分）；
- o) 確定您或您所欠的債務金額、維護有關權利，包括但不限於向您追收債務、追索損失和其他未償還金額、 為惠及任何信期香港或任何中信証券、中信期貨有限公司或他們所屬的集

團公司行使抵押品、押記 權或其他權利及權益、提起法律訴訟、執程序和在催收函、索賠和法院文件中進行披露；

- p) 容許與閣下及／或閣下之戶口有關的權利或業務的實質或潛在承讓人、受讓人、參與人或分參與人評估擬以該讓與、轉讓、參與或分參與為主體的交易；
- q) 資料處理、備份和存檔；
- r) 爲了維護本公司、本公司的客戶或其他第三方的任何其他合法利益；
- s) 進行法律所允許之核對程序（定義見個人資料（私隱）條例）；及
- t) 一切與上述有聯繫、有附帶性及有關的用途。

如果本公司因與上述無關的目的需要使用任何資料，本公司會通知您並徵得同意，以允許本公司這樣做。如果您不是本公司的客戶，本公司可能需要處理該您的個人資料，以便爲本公司的客戶提供客戶服務或便利，包括提供孖展貸款。此個人資料可能會在有關過程中提供給本公司，例如，在信用審核過程中提供給本公司，或由其他第三方（信貸諮詢機構）提供。資料甚至可能會在本公司或其他交易對手（例如，結構性票據之發行人）提起的法律訴訟中被轉移或使用，以向您（例如，作爲結構性票據的持有人或（視情況而定）作爲孖展貸款的擔保人）追討未償債務和損失。

CFHK may use, store, process, disclose, transfer and delete Data for one or more of the following purposes from time to time::

1. opening and maintaining of Securities Accounts and other accounts;
2. giving effect to your orders relating to transactions or otherwise, and carrying out your other instructions;
3. the daily operation of account(s), services and margin facilities provided to you or to the borrower when you are a guarantor or security provider for the relevant facilities;
4. complying with regulatory and internal requirements relating to client onboarding due diligence, verification and ongoing reviews, prevention and detection of money laundering, terrorist financing or other unlawful or improper activities, fraud detection, sanctions monitoring;
5. complying with court orders and legal requirements, obligations, requirements or arrangements which apply to CFHK, its Affiliates, CITIC Securities Co., Ltd. (“CITICS”), CITIC Futures Company Limited or their group companies, including but not limited to treaties, agreements, reciprocal principles and other arrangements between Hong Kong Government and other foreign governments (including those relating to tax reporting and automatic exchange of financial account information);
6. responding to requests from public or government authorities (which may include without limitation, regulators, law enforcement agencies, securities exchange or other similar agencies or authorities, tax authorities, hospital authority, social welfare department and other authorities in and outside Hong Kong) to cooperate with any enquiry or investigation;
7. conducting credit enquiries or checks on you and ascertaining your financial situation, ongoing creditworthiness and investment objectives, and enabling or assisting any other person to do so;
8. creating and maintaining your credit history, credit scoring models and other analysis (whether or not there exists any relationship between them and any CFHK company) for present and future reference;
9. compliance checking, risk management, internal control and audit purposes (including review and monitoring of account activities, transactions, margin and other positions and data and conducting audits (both external and internal));
10. customer relationship management and processing of relevant data;

11. ascertaining and understanding the investment experience, investment objectives, financial position, investment time horizon, risk tolerance level, liquidity needs, diversification needs and other circumstances of Customers;
12. designing financial products or services for use of Customers;
13. answering enquiries from (as the case may be) counterparties, product issuers/guarantors, dealers, distributors, collective investment schemes or their managers, administrators, investment managers, trustees or custodians, Custodial Agents, other custodians or agents or any such party's nominees or affiliates and providing them with Data to enable them to recover debts and losses, enforce their other rights or to answer enquiries from regulators, securities exchanges or other government/judicial authorities;
14. direct marketing and promotion of existing and future services or products (e.g. banking and financial services or products) of CFI, CFIS and any of its affiliate companies; in respect of which CFHK may or may not be remunerated (please also refer to the section on "Direct Marketing" below);
15. determining the amount of indebtedness owed to or by you and enforcing the same, including without limitation the collection of debts, recovery of losses and other amounts outstanding from you, enforcement of security, charge or other rights and interests in favour of any CFHK company, CITICS, CITIC Futures Company Limited or any of their group companies, commencement and conduct of legal proceedings and enforcement proceedings and making disclosures in demand letters, claims and court documents;
16. enabling CFIS's actual or potential assignee, transferee, participant or sub-participant of CFIS's rights or business in respect of you or your Account(s) to evaluate the transaction intended to be the subject of the assignment, transfer, participation or sub-participation;
17. data processing, back-up and archive;
18. for the protection of any other legitimate interests of ourselves, our customers or those of another third party;
19. conducting matching procedures (as defined in the Personal Data (Privacy) Ordinance) as permitted by law; and
20. all other incidental and associated purposes relating to the above.

If we need to use any Data for a purpose unrelated to the above, we shall notify you and seek your consent to allow us to do so. If you are not our Customer, we may need to process your Data in order to provide client services or facilities to our Customer, including the provision of margin financing. The Data may be provided to us through the course of the matter for example, provided to us as part of a credit review process or provided by another third party (a credit reference agency). Data may even be transferred and used in legal proceedings commenced by us or other counterparties (such as a structured note issuer) to recover outstanding debts and Losses from you (such as a holder of a structured note or (as the case may be) a guarantor in respect of a margin loan of a Customer).

#### **4. 處理資料的法律依據**

##### **The Legal Grounds for Processing Data**

我們可能將您的資料用於上述第 3 條中規定的目的，每個目的皆是依據以下法律依據，其中包括：

We may use your Data for the purposes as set out in clause 3 above and, for each purpose, based on the

following legal grounds, among other things:

- a) **履行合同** - 這是為了履行我們在合同項下的義務而需要處理您的資料；
- b) **法律義務** - 這是指我們需要處理您的資料以履行法律義務、法定職能或法定義務，例如為稅務目的保存 記錄或向公共機構或執法機構提供資料；
- c) **公共利益** - 我們可能會處理有關您的資料，以執行為公共利益或在緊急情況下保護自然人的生命、健康 或資產的任務；
- d) **您的同意** - 我們在您同意的情況下處理您的資料，並且只有在您同意的情況下，我們才會處理您的資料；或
- e) **披露信息** - 我們可能會處理由您或以其他方式合法披露的資料。

- a) **Performance of a contract** - this is when the processing of your Data is necessary in order to perform our obligations under a contract;
- b) **Legal obligation** - this is when we are required to process your Data in order to comply with a legal obligation or statutory functions, or statutory obligations, such as keeping records for tax purposes or providing information to a public body or law enforcement agency;
- c) **Public interests** - we may process your Data where it is for the performance of a task carried out in the public interest or protection of life, health or assets of natural persons under emergency;
- d) **Your consent** - we process your Data with your consent, and we will only process your Data if you agree to us doing so; or
- e) **Disclosed information** – we may process your Data that is disclosed by you or otherwise legally disclosed.

## 5. 同意 Consent

通過與我們互動並向我們提供信息，或登記由我們提供的產品或服務，您表示並同意：

- a) 我們將出於本聲明中所述的目的收集、使用、披露和共享資料；
- b) 我們將被授權以本聲明中規定的方式向我們的關聯公司、授權服務提供商和相關第三方披露此類資料；
- c) 我們將被授權出於本聲明中所述的目的處理您的敏感信息（定義見個人信息保護法）；
- d) 我們將被授權在相關司法管轄區跨境傳輸您的資料；和
- e) 我們將被允許向我們的關聯公司和其他第三方披露和/或傳輸您的資料，如下所述。

如果您不希望我們在未來的任何時間繼續使用您的資料或您提供給我們的資料用於任何目的，您必須通知我們撤回您的同意（見下文）。根據情況，您撤回同意可能會導致我們無法向您提供我們一直向您提供的某些 服務和/或產品，因此在法律允許的情況下，可能會導致您與我們的關係和/或賬戶終止。撤回同意不會影響 在撤回前基於您的同意收集、使用和披露您的資料的合法性。

如果相關司法管轄區的資料保護法允許我們在未經您同意的情況下收集、使用或披露資料，則法律下的授權 將繼續適用。

By interacting with us and submitting information to us, or signing up for any products or services offered by us, you represent and agree that:



- a) we shall collect, use, disclose and share Data for the purposes stated in this Statement;
- b) we shall be authorised to disclose such Data to our Affiliates, authorised service providers and relevant third parties in the manner set forth in this Statement;
- c) we shall be authorized to process your sensitive personal information (as defined in the PIPL) for the purposes stated in this Statement;
- d) we shall be authorized to disclose your Data outside of relevant jurisdictions; and
- e) we shall be allowed to disclose and/or transfer your Data to our Affiliates and other third parties as provided below;

If you do not wish for us to continue to use your Data or the Data provided by you to us for any of the purposes at any time in the future, you must notify us to withdraw your consent (see the section below). Depending on the circumstances, your withdrawal of consent may result in our inability to provide you with certain services and/or products that we have been offering to you, and consequently, may result in the termination of your relationship and/or accounts with us if permitted under the applicable laws. The withdrawal of consent will not affect the lawfulness of the collection, use, and disclosure of your Data based on your consent before it was withdrawn.

Where the Data Protection Laws of the relevant jurisdictions permit us to collect, use or disclose the Data without your consent, such permission granted by law will continue to apply.

## 6. 資料披露

### Disclosure of Data

信期香港可因第 3 所述一個或多個目的向下列類別的人士提供資料：

- a) 中信証券及其任何集團公司；
- b) 信期香港及其任何集團公司；
- c) 以其名義登記您的證券或其他資產之代名人；
- d) 姓名篩查服務/盡職調查服務/資料庫的供應商、電子認證機構和其註冊機構、輕型目錄存取協定服務提供者 and 身份認證機構； e) 向信期香港或任何中信証券所屬集團公司提供營運行政、資料處理、財務、計算機、電訊、資訊科技、付款、證券結算、清付、專業或其他服務之任何承辦商、代理、服務供應商、銀行、基金公司、保險公司，無論是香港或香港以外的；
- f) 信期香港代表您進行交易所涉及的對手方、產品發行人/擔保人、代理商、分銷商、集體投資計劃和其經理、管理人、投資經理、信托人和托管行、保管代理人、其他托管行、代理人和上述各機構的代名人、關聯公司；
- g) 信貸諮詢機構，及收數公司(於違約時)；
- h) 任何就您的義務而提供或擬提供擔保或第三方抵押品的人士；
- i) 任何信期香港權利或業務的實質或潛在之承讓人、受讓人、參與人、分參與人、代表或繼承人；
- j) 位於香港或香港以外的公共或政府機構（可能包括監管機構、證券交易所或其他類似機構或機關、稅務局，醫院管理局、社會福利部門以及其他機構）；
- k) 由中信証券香港或其關聯公司聘用的法律或其他專業顧問和代理人；
- l) 香港、其他司法管轄區的執法機構（包括但不限於香港警察和廉政公署）；及
- m) 您要求和/或同意披露的任何人士/機構。

其他實體和第三方服務供應商也會處理資料。如果資料是由中信証券、任何關聯公司或第三方服務供應商處理資料，本公司將取得您同意披露資料並將確保有關保密協議，其中包含維護保密性的條款和

政策/程序，以遵守資料保護法。根據您的要求，我們還將通知您接收方的姓名和聯繫信息、處理目的和方法以及資料類型。外包安排須經過盡職調查和合理可行的監控，以確保資料的整個生命週期達到隱私保護標準。

CFHK may provide Data to the following classes of persons for one or more of the purposes set out in clause 3 above:

- a) CITICS and any of its group companies;
- b) CFHK and any of its group companies;
- c) any nominees in whose name your securities or other assets may be registered;
- d) name-screening services/due diligence/data base service providers, electronic certification bodies and their registration authorities, Lightweight Directory Access Protocol service providers and identification agencies;
- e) any contractors, agents, service/solutions providers, software/application developers, banks, fund houses and insurance companies in or outside Hong Kong, which provide administrative, data processing, financial, computer, telecommunications, information technology, payment, clearing, settlement, professional or other services to CFHK or to any group companies of CITICS or CFHK;
- f) any counterparties, product issuers/guarantors, dealers, distributors, collective investment schemes and their managers, administrators, investment managers, trustees and custodians, Custodial Agents, other custodians and agents and any such party's nominees and affiliates involved in transactions conducted by CFHK on behalf of you;
- g) credit reference agencies, and, in the event of default, debt collection agencies;
- h) any party giving/proposing to give/who has given a guarantee or third party security to guarantee or secure your obligations;
- i) any actual or potential assignee, transferee, participant, sub-participant, delegate, or successor of the rights or business of CFHK;
- j) judicial bodies and public or government authorities (which may include regulators, securities exchange or other similar agencies or authorities, tax authorities, hospital authority, social welfare department and other authorities) in and outside Hong Kong; k) legal or other professional advisers and agents engaged by CFHK or its Affiliates;
- l) law enforcement bodies of Hong Kong (including but not limited to Hong Kong Police and Independent Commission Against Corruption) and those of other jurisdictions; and
- m) any party in respect of which such disclosure is requested and/or consented by you.

Other entities and third party service providers will also process Data. To the extent that CITICS, an Affiliate or third party service provider processes the Data, CFHK will obtain your consent on the disclosure and ensure that they execute agreements containing provisions preserving confidentiality and policies/procedures in place to comply with the applicable Data Protection Laws. Upon your request, we will also inform you the recipient's name and contact information, the purpose and method of handling, and the types of Data. Outsourcing arrangements are subject to due diligence and reasonably practicable monitoring to ensure an adequate standard of data privacy protection throughout the life of the outsourcing.

## 7. 直接營銷

### **Direct Marketing**

信期香港可能將資料用於直接營銷，為此須事先獲得您的同意（包括表示不反對）。本公司可以不時使用您的姓名、聯絡資料、產品及服務組合資料、交易模式及行為、財務背景、投資經驗及背景、風險承受能力用於直接營銷。向您促銷的產品、服務及項目可包括：

- a) 金融產品及服務；
- b) 保險、信用卡、銀行及相關服務及產品；
- c) 股份獎勵計劃；及
- d) 信期香港、其關聯公司或合作品牌夥伴提供之產品和服務。

以上產品、服務及項目可由以下機構提供或征求：

- a) 信期香港或其（香港或香港以外的）關聯公司；
- b) 中信證券、信期香港或其任何集團成員公司；
- c) 第三方金融機構、承包人、信用卡公司、證券及投資服務供應商；及
- d) 信期香港或其關聯公司的合作品牌夥伴。

本公司擬將上述資料提供給上述一個或多個機構用於直接營銷有關產品、服務及項目，而為此本公司須獲得您的書面同意（包括表示不反對）。本公司可能因將資料提供予上段所述機構而獲得金錢利益或其他利益，本公司會于征求資料當事人同意或不反對時通知資料當事人。

如果您不希望資料被用於直接營銷，您可以在《客戶開戶表格》中的相應方框中打勾或以書面形式通知我們，以行使其拒絕促銷的權利。行使其拒絕促銷權利的請求也可以發送給被公司之個人資料主任（聯繫方式見下面）。但是，如果直接營銷是以其代表公司或企業的身份發給您的，而不是以您的個人或個人身份發送給您的，則提出此類請求的權利不適用於您。

We may use Data for direct marketing purposes and requires your consent (which includes an indication of no objection) before it could do so. We may use your full name, contact details, products and services portfolio information, transaction pattern and behaviour, financial background, investment experience and background, risk profile for direct marketing purposes. The following classes of products, services and initiatives may be marketed to you:

- a) financial products and services;
- b) insurance, credit card and related services and products;
- c) share ownership plan services;
- d) products and services offered by CFHK's Affiliates or co-branding partners;

The above products, services and initiatives may be provided or solicited by:

- a) CFHK or its Affiliates (in Hong Kong or outside Hong Kong);
- b) CITICS, CFHK or any group companies of CITICS or CFHK;
- c) third party financial institutions, insurers, securities and investment services providers; and
- d) co-branding partners of CFHK or its Affiliates.

We intends to use and to provide the above-mentioned Data to all or any of the above parties for use by them in marketing those products, services and initiatives, and we requires your written consent (which includes an indication of no objection) for that purpose. We may receive money or other benefits in return for providing the relevant Data to the above parties. When requesting the Data Subject's consent, we will inform him/her if it will receive any money or other benefits in return for providing the Data to any other party.

If you do not wish to have your Data used for direct marketing purposes, you may exercise your opt-out right by ticking the appropriate box in the Account Opening Form, or by notifying us in writing. Please address opt-out requests to CFHK's Data Protection Officer (contact details below). However, 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.

## 8. 轉移資料到香港以外

### Cross-border Transfer of Data

為出於上文第 3 條規定的目的，您的資料可能會傳輸到其他不受資料保護法約束的國家/地區共享，而該等國家不同於向我們披露或接受資料的國家/地區。

跨境傳輸到另一個司法轄區的資料可能會根據該司法轄區適用的法律、規則、法規、指南、指令、命令和慣例進行披露、處理、存儲和維護。例如，就客戶關係管理、信用評估、風險管理、審計和資料處理或其他目的向中信期貨有限公司傳輸資料時，請注意資料將存儲在中國內地；因此存儲的資料受中華人民共和國（「中國」）的法律、法規、命令和慣例的約束，並受制於中國執法機構和監管機構。我們與中信期貨有限公司或（視情況而定）其他實體或服務提供商之間的合同中規定的資料訪問限制不能凌駕於中國法律或監管要求或其他司法轄區的法律或監管要求之上。

就您的資料，於不同司法轄區的實體都遵守內部政策和程序，及適用的資料保護法。

For the purposes specified in clause 3 above, your Data may be transferred to or shared across other countries that may not be subject to Data Protection Laws similar to those prevailing in the jurisdiction in which such information is provided to or received by us.

Data transferred to another jurisdiction may be disclosed, processed, stored or maintained in accordance with the laws, rules, regulations, guidelines, directives, orders and practices applicable in that jurisdiction. For example, in so far as Data is transferred to CITIC Futures Company Limited for customer relationship management, credit assessment, risk management, audit and data processing or other purposes, please be informed that the Data will be stored in the Mainland China; the Data so stored is subject to the laws, regulations, orders and practices of the People's Republic of China (「PRC」) and to access by PRC law enforcement agencies and regulators. Restrictions on data access as stated in the contract between CFHK and CITIC Futures Company Limited or (as the case may be) other entities or service providers cannot override PRC laws or regulatory requirements or those of other jurisdictions. All of our offices adhere to the internal policies and procedures with respect to your Data in compliance with applicable Data Protection Laws.

All of our offices adhere to the internal policies and procedures with respect to your Data in compliance with applicable Data Protection Laws.

## 9. 網站

### Web-site

我們可以收集、處理和使用其網站瀏覽者的資料，以便為瀏覽者提供改進的產品和服務，以便為瀏覽者提供改進的產品和服務，使業務流程適應客戶的需求，並引導瀏覽者使用相關的產品信息和在線交易平台。Cookies 是網站伺服器放置在電腦或其他設備上的獨有標記，它包含可供發佈 Cookie 的伺服器以後讀取的信息。我們可以在本公司的網頁使用 Cookies。經這個途徑收集的信息（包括但不限於瀏覽者的登錄 ID、MAC 地址、IP 地址（和域名）、設備和技術、瀏覽器軟件、其瀏覽器的類型和配置、語言設定、地理位置、操作系統、外圍有關信息、引薦網站、瀏覽的頁面和內容，以及瀏覽時間）

會作以下用途：

- a) 分析本公司網站的流量；
- b) 匯總有關瀏覽者如何到達和瀏覽本公司網站的統計資料；
- c) 改善用戶體驗；
- d) 客戶和用戶管理和營銷；
- e) 向訪客介紹本公司的服務和產品；及
- f) 評估本公司營銷計劃的有效性。

此類信息是匿名收集的，除非瀏覽者以客戶/用戶身份登錄，否則本公司無法識別他/她的身份。階段作業 Cookies 讓本公司的網站能夠跟蹤瀏覽者在頁面之間的移動，因此不會要求他/她提供已經提供給網站的相同信息。功能 Cookies 使瀏覽者可以快速地、輕鬆地瀏覽網站的多個頁面，而不必驗證或處理每個瀏覽的新區域。廣告 Cookies 讓信期香港可以在本公司的網站上提供與瀏覽者盡可能相關的廣告，例如通過挑選瀏覽者感興趣的廣告，或防止相同的廣告重複出現。

大多數網站瀏覽器最初都設置為接受 Cookies 的。如果您不想接收 Cookies，則可以在瀏覽器設置中禁用此功能。但是，這樣做的話可能無法完全享受本公司網站的好處，並且某些功能可能無法正常使用。

We may collect, process and use Data of visitors to its website in order to provide improved products and services to visitors, to adapt business processes to customers' needs, and to direct visitors to the relevant product information and online trading platforms. Cookies are unique identifiers placed on a computer or other device by a web server, which contains information that can later be read by the server that issued the cookie. We may use cookies on its website. The information collected (including but not limited to: visitor's logon ID, IP addresses (and domain names), browser software, types and configurations of his/her browser, language settings, geo-locations, operating systems, peripherals, referring website, pages and content viewed, and durations of visit) will be used for:

- a) analyzing our web-site's traffic;
- b) compiling aggregate statistics on how visitors reach and browse our websites;
- c) improving user experience;
- d) customer and user administration and marketing;
- e) informing visitors about our services and products; and
- f) gauging the effectiveness of our marketing initiatives.

Such information is collected anonymously and the visitor cannot be identified unless he/she has logged on as a customer/user. Session cookies enable our website to keep track of the visitor's movement from page to page so that he/she is not asked to provide the information already given to the site. Functionality cookies allow visitors to proceed through many pages of a site quickly and easily without having to authenticate or reprocess each new area he/she visits. Advertising cookies will allow CFHK to provide advertisements on our website which are as relevant to the visitor as possible, e.g. by selecting interest-based advertisements, or preventing the same advisement from constantly reappearing.

Most web browsers are initially set up to accept cookies. If you do not want to receive cookies, you can disable this function in your browser settings. However, by doing so, you may not be able to enjoy fully the benefits

of our websites, and certain features may not work properly.

## 10. 在線/流動交易平台

### **On-line/Mobile Trading Platforms**

信期香港也有為客戶提供在線和流動交易平台供他們使用。信期香港可以在這個過程中收集、轉移、存儲和使用有關客戶設備的技術、位置和登錄信息以及其他個人資料和相關信息（例如：MAC 地址和 IP 地址）、系統和應用軟件以及外圍設備。

CFHK also offers on-line and mobile trading platforms to its Customers. CFHK may, during the process, collect, transmit, store and use technical, location and login and other personal data and related information about the Customer's device (e.g. MAC address and IP address), system and application software, and peripherals.

當客戶使用任何此類交易平台時，信期香港和第三方供應商/許可方可以使用審核日誌、緩存、Cookies 和/或像素標記來收集此類信息並儲存客戶的編號。信期香港可以使用有關信息作各樣用途例如：安全監察、提供導航、提供軟件更新或產品支持、加強顯示信息的效率、使用平台時個性化客戶的體驗，以及進行在線跟蹤、客戶關係管理、合規監察和審查、風險管理等）。信期香港也可以識別客戶使用的設備，以協助其使用服務或流動應用程式。本公司還可以收集有關服務或流動應用程式使用情況的統計信息，以改善設計和功能，了解其使用方式並協助其使用服務或流動應用程式。本公司還可以收集有關服務或流動應用程式使用情況的統計信息，以改善設計和功能，了解其使用方式並協助本公司解決有關服務或流動應用程式的問題。本公司建議客戶在使用前，仔細閱讀相關交易平台或（視情況而定）流動應用程式的《使用條款》。

When Customers use any such trading platforms, CFHK and third party vendors/licensors may use audit logs, cache, cookies and/or pixel tags to collect such information and store the Customer's preferences. CFHK may use the information for various purposes (for instance, security purpose, to facilitate navigation or provision of software updates or product support, to display information more effectively, and to personalize the Customer's experience while using the platform, as well as for on-line tracking, customer relationship management, compliance monitoring and checking and risk management). CFHK may recognize the device used by the Customer in order to assist his/her use of the service or the mobile application. We may also gather statistical information about the usage of the service or mobile application in order to improve the design and functionality, understand how it is used and to assist CFHK with resolving issues regarding it. Customers are advised to review the Terms of Use of the relevant trading platform or (as the case may be) the mobile application carefully before using it.

## 11. 外部鏈接

### **External Links**

如果信期香港的網站或平台里有指向其他網站的鏈接，則這些網站不會根據本聲明運作。本公司建議瀏覽者先審查這些網站的私隱聲明，以了解其關於收集、使用、轉移和披露個人資料的政策。對於連接到我們網站的任何其他網站或頁面的內容以及任何此類鏈接網站或頁面的使用，我們概不負責。提供此鏈接僅是為了您的方便和信息。以下鏈接到任何其他網站或頁面的風險由您自行承擔。

If any part of the CFHK's website or platform contains links to other websites, those sites do not operate under this Statement. Visitors are advised to check the privacy statements of those websites to understand their

policies on the collection, usage, transfer and disclosure of personal data. We will be not responsible for the content of any other websites or pages linked to or linking to our website and usage of any of such linked websites or pages. Such links are provided solely for your convenience and information. Following links to any other websites or pages shall be at your own risk.

## 12. 保存

### Retention

信期香港遵循保存政策，以確保資料被保存的時間不會長於手機它目的所需的時間及符合適用法律和法規要求。

CFHK follows retention policies to ensure that Data is retained only so long as required for the purposes for which it was collected, and as necessary to comply with applicable legal and regulatory requirements.

## 13. 您的權利

### Your Rights

根據適用的資料保護法，您有權享有以下權利：

- a) **被告知** - 如本聲明中所述您有權被告知您的資料的收集和使用情況。根據您的要求，我們將向您提供本 公司關於資料的政策和做法，其中包括處理您的資料的目的、處理方法、保留政策以及將與誰共享；
- b) **決定** - 您有權決定處理您的資料；
- c) **訪問** - 您有權索取我們正在處理有關您的資料的副本。如果您需要額外的副本，我們可能需要收取合理 的費用；
- d) **更正** - 您有權要求我們更正您的資料中的任何錯誤，無論是不完整的還是不準確的；
- e) **消除** - 您有權要求消除與您有關的資料。如果出現以下情況，我們可能會刪除您的資料：
  - i) 處理目的已經實現、無法實現或不再需要實現的；
  - ii) 我們停止提供產品或服務，或約定的保留期限已過；
  - iii) 您的同意已被撤回；
  - iv) 處理您的資料違反法律、行政法規或協議的；或者
  - v) 法律、行政法規規定的其他情形。

除非適用法律和法規要求我們維護資料，或者在技術上不可行，在這種情況下，我們將採取必要的安全措施。

- f) **可攜帶性** - 您有權以結構化、常用可讀的格式接收您提供給我們的資料，並有權在某些情況下將該資料 傳輸給第三方；
- g) **反對** - 您有權 (i) 隨時反對出於直接營銷目的處理您的資料，以及 (ii) 反對我們處理您的資料，即便此類 處理的法律依據是出自我們或第三方追求合法利益，我們也將遵循您的要求，除非我們提供令人信服的 法律依據；
- h) **處理限制** - 您有權在某些情況下要求限制我們處理您的資料，但法律或行政法規另有規定的除外；
- i) **撤銷同意** - 如果我們依賴您的同意（或明確同意）作為我們處理您資料的法律依據，您有權隨時撤銷該 同意。

在處理查閱或更正資料要求時，我們將核對請求人的身份，以確保他/她是合法有權提出查閱或更正資料要 求的人。請將訪問和/或更正個人資料的請提交給資料保護主任（聯繫方式如下）。我們可能會

就遵守資料存取要求收取合理費用。

資料當事人或其他第三方向我們提供（或授權提供）資料並保證該等資料真實、準確和完整，並同意若資料更改將以書面形式通知我們。

Subject to applicable Data Protection Laws, you are entitled to the following rights:

- a) **Being informed** - You have the right to be informed about the collection and use of your Data as stated in this Statement. Upon your request, we will provide you with the CFHK's policies and practices in relation to the Data which includes the purposes for processing your Data, processing method, our retention policy, and who it will be shared with;
- b) **Deciding** - You have right to decide on the processing of your Data;
- c) **Access** - You have the right to request a copy of the Data that we are processing about you. If you require additional copies, we may need to charge a reasonable fee;
- d) **Rectification** - You have the right to require the correction of any mistake in the Data, whether incomplete or inaccurate, that we hold about you;
- e) **Erasure** - You have the right to require the erasure of Data concerning you. We may delete your Data if:
  - i) where the purpose of processing has been achieved, unable to achieve, or is no longer necessary to achieve;
  - ii) where we stop providing products or services, or the agreed storage period has expired;
  - iii) where your consent has been withdrawn;
  - iv) where the processes of your Data is in violation of laws, administrative regulations, or the agreement; or
  - v) any other circumstance as prescribed by laws and administrative regulations. except that we are required to maintain the Data by applicable laws and regulations or it's not technically doable in which case we will take necessary safety measures.
- f) **Portability** - You have the right to receive the Data concerning you that you have provided to us, in a structured, commonly used, and machine-readable format and have the right to transmit that Data to a third party in certain situations;
- g) **Objection** - You have the right to (i) object at any time to the processing of your Data for direct marketing purposes and (ii) object to our processing of your Data where the legal ground of such processing is necessary for legitimate interests pursued by us or by a third party. We will then abide by your request unless we can demonstrate compelling legal grounds for the processing;
- h) **Restriction of processing** - You have the right to request that we restrict our processing of your Data in certain circumstances, except as otherwise provided by any laws or administrative regulation;
- i) **Withdrawal of consent** - If we rely on your consent (or explicit consent) as our legal basis for processing your Data, you have the right to withdraw that consent at any time.

When handling a data access or correction request, we will check the identity of the requestor to ensure that he/she is the person legally entitled to make the data access or correction request. Please address requests for access and/or correction of personal data to the Data Protection Officer (contact details below). CFHK may charge a reasonable fee for complying with a data access request.

Data Subjects and other third parties who provide (or authorize the provision of) Data to us represent and warrant that such Data is true, accurate and complete and shall notify us in writing immediately upon any



changes in Data previously provided to us.

#### 14. 資料安全保護措施

##### Data Security Protection Measures

信期香港已採取合理的安全措施來保護資料免受非法處理、破壞或意外。本公司使用電子安全措施來控制資料的接觸，包括使用密碼、防火牆、加密措施，以便在使用前對信息系統進行身份驗證和授權。本公司也採用了記錄保存機制來維護處理或使用的資料時涉及的相關記錄，例如記錄處理目的、資料當事人的類型和資料接受者。本公司會對資料轉移進行內部審查，並定期對資料傳輸、整理、信息系統和網絡安全結構進行隨機審查。信期香港也採用了合理的措施來保護和控制資料和其他保密信息，包括但不限於：防火、防止煙霧和水的損害、火災和緊急警報系統、密碼鎖定的文件、使用保護裝置或其他設備以防止丟失或未經授權刪除手動保存的資料、限制接觸以防止未經授權讀取資料和文檔。CFHK has implemented reasonable security measures to protect Data from risks such as illegal processing, destruction or accidental loss. We use electronic security measures to control access to Data, including the use of passwords, firewalls and mechanisms to encrypt Data, such that the information systems are authenticated and authorized prior to usage. CFHK has applied a record-keeping mechanism to maintain relevant records when processing or using Data, such as recording the purpose of processing, the type of Data Subject and the data recipient. We shall implement internal reviews on Data transfer and conduct regular random checks on Data transmission, organization, information systems and network security structures. CFHK has also taken reasonable measures to secure and control the physical security of Data or other confidential information, including but not limited to: fire prevention; prevention of smoke and water damage, fire and emergency alarm systems, password-locked files, protective devices or other equipment to prevent loss or unauthorized deletion of manually saved data, restricted access to prevent unauthorized access to Data and documents.

雖然我們努力保護您的資料，但我們無法確保您可能通過使用不安全瀏覽器的方法傳輸給我們的任何資料的安全性，我們敦促您採取一切預防措施保護您的資料並使用安全瀏覽器。

While we strive to protect your Data, we cannot ensure the security of any Data which you may have transmitted to us via methods using an unsecure browser, and we urge you to take every precaution to protect your Data and use a secure browser.

#### 15. 其他

##### Miscellaneous

信期香港可以在任何時候未經事先通知的情況下修改、更新或者修訂本聲明。如果信期香港決定這樣做，只需將這些修改、更新或修訂通知資料當事人即可。本公司會將修訂版本發佈在公司網站上。任何此類更改、更新或修訂將在發佈後立即生效。

CFHK may, at any time and without prior notice, amend, update or modify this Statement, simply by notifying Data Subjects of such amendment, update or modification. If CFHK decides to do so, we shall post the revised version on our website. Any such change, update or modification will be effective immediately upon posting.

本聲明不會限制閣下在個人資料（私隱）條例下享有的權利。

Nothing in this Statement shall limit your rights under the Personal Data (Privacy) Ordinance.

本聲明將構成閣下與信期證券或中信期貨國際訂定之所有合約、協議及其他具約束力的合同之組成部

份。

This Statement shall become an integral part of all contracts, agreements and other binding agreements which you enter into with CFIS or CFI.

如本聲明中、英文版本有任何歧義，則以英文版本為準。

In the event of discrepancy between the Chinese version and the English version of the Statement, the English version shall prevail.

如對本聲明或信期香港的其他個人資料私隱政策或措施有任何疑問，請聯繫：

資料保護主任

信期證券/中信期貨國際

地址：香港中環添美道 1 號中信大廈 23 樓 2312-2316

Any enquiries regarding this Statement or CFHK's other personal data privacy policies or practices may be addressed to:

Data Protection Officer

CFIS/CFI

2312-2316, 23th Floor, CITIC Tower 1, Tim Mei Road Central, Hong Kong