



中陽證券有限公司

ZHONG YANG SECURITIES LIMITED

Notice to Clients Relating to the Personal Data (Privacy) Ordinance

關於個人資料(私隱)條例客戶通知

ZY Securities is committed to the protection and privacy of the personal data of its clients or prospective clients or other individuals (“Clients”) collected, held, processed or used by it. This notice is issued by ZY Securities and is intended to notify the Clients of the purposes for which their personal data is collected, the intended uses of the collected data and other matters required under the Personal Data (Privacy) Ordinance (Cap.486 of the laws of Hong Kong) (“PD(P)O”).

中陽證券致力於保護及保障其所收集、持有、處理或使用的客戶或準客戶或其他個人(「客戶」)之個人資料的私隱。本通知書是由中陽證券發出，旨在通知客戶其個人資料被收集的目的、所收集資料的用途及《個人資料(私隱)條例》(香港法例第486章)(「個人資料(私隱)條例」)所規定的其他事項。

1. In this notice, “ZY Securities” is collecting the personal data of the clients and ZY Securities refers to ZY Securities Limited and their respective affiliates collectively or individually. “Affiliates” means, with respect to a company, any other entity that, directly or indirectly through one or more intermediaries, owns or controls, is owned or controlled by, or is under common ownership or control with, such company, where “own” means the holding of more than half of the issued share capital or equity of the relevant entity and “control” means the power to direct the management or policies of or control the composition of the board of directors of the relevant entity or ownership and control of more than half of the voting power in general meetings of the relevant entity.

在本通知書中，「中陽證券」指中陽證券有限公司及其個別的附屬成員(不論集體或個別而言)。「附屬成員」指就任何公司而言，直接或間接透過一個或多個中介人擁有或控制該公司的、被該公司擁有或控制的或是與該公司共同受擁有或控制的任何其他團體，而「擁有」則指擁有相關團體的超過一半的已發行股本或股權，而「控制」則指具有權力指示相關團體的管理層或政策或控制其董事局的組成，或在相關團體的股東大會上擁有及控制超過一半的表決權。

2. Personal data is collected from time to time by ZY Securities from the Clients in connection with the opening or continuation of accounts (including securities account (cash), the establishment or continuation of credit and/or provision of securities, derivatives, financial, investment, wealth management and related services and products (including but not limited to securities, financial, nominee, custodian and investment advisory services and products) (“Brokerage Services & Products”). Provision of some of such data is necessary and failure to do so may result in ZY Securities being unable to open or continue the Accounts or provide, establish or continue the Brokerage Services & Products or Facilities.

中陽證券不時就開立或維持帳戶(包括證券帳戶(現金))、開設或維持信貸及/或提供證券、衍生工具、金融、投資、財富管理及相關服務及產品(包括但不限於證券、財務、代名人、保管人及投資顧問服務及產品)(「經紀服務及產品」)，向客戶收集個人資料。部份該些個人資料為必需提供，如客戶未能提供該等資料，則可能導致中陽證券無法開立或維持帳戶，或提供、設立或維持經紀服務及產品或融通。

3. Personal data may also be collected from the Clients in the ordinary course of the continuation of the business relationship between the Clients and ZY Securities or pursuant to laws, regulations, rules or codes which are binding on ZY Securities.

個人資料亦可能在客戶與中陽證券維持正常業務聯繫的過程中或根據對中陽證券具約束力的法律、規定、規則或守則下向客戶收集。

Use and Transfer of Personal Data 使用及轉移個人資料

4. The personal data relating to the Clients collected may be used by ZY Securities for one or more of the following purposes:

中陽證券可將收集到的與客戶有關的個人資料用作以下一個或多個用途：

- (a) opening the Accounts for the Clients, processing the Clients' applications for such Accounts and conducting client identity due diligence or verification;
為客戶開立帳戶、處理客戶對有關帳戶的申請及對客戶身份進行盡職審查或核實；
- (b) the daily operation of the Accounts and the provision of Brokerage Services & Products and Facilities to Clients;
帳戶的日常運作和為客戶提供經紀服務及產品及融通；
- (c) conducting credit checks and assisting other financial institutions in conducting credit checks on Clients; 對客戶進行信貸檢查並協助其他財務機構對客戶進行信貸檢查；
- (d) entering into, effecting, clearing and settling transactions on the instructions of Clients; 按客戶指示訂立、執行、結算及交收交易；
- (e) designing Brokerage Services & Products or Facilities for Clients' use; 設計經紀服務及產品或融通供客戶使用；
- (f) analysing trends and behaviour as well as conducting customer surveys to continuously improve our services and products;
分析走勢及行為並進行客戶調查，以不斷改進本行的服務及產品；
- (g) marketing the services, products, events and/or promotions of ZY Securities to Clients (please refer to paragraph 6 below for details);
向客戶推廣中陽證券的服務、產品、活動及/或推廣(詳情請參閱下文第 6 段)；
- (h) determining any liability and amount of indebtedness as between the Clients and ZY Securities; 確定客戶及中陽證券之間的任何債務及欠負的款額；
- (i) collection of debts or other sums owing to ZY Securities by Clients and those providing security or guarantee for Clients' obligation;
追收客戶或為客戶之責任提供擔保或保證的人士虧欠中陽證券的債項及其他款項；
- (j) matching and comparing the personal data collected with data from other sources for the purpose of verification to the extent legally permissible;
於法律允許範圍內為核實的目的核對及比較所收集的個人資料及來自其他來源的資料；
- (k) meeting the requirements of any laws, regulations and rules, codes, decisions, guidelines, requests, orders or recommendations of any governmental, regulatory or supervisory authority, exchange or court ("**Rules**") which is binding on or applicable to ZY Securities (including without limitation to those relating to securities trading, disclosure of interest or other information, anti-money laundering or terrorist financing); and 遵從對中陽證券具約束力或適用的任何法律或任何政府、法規或監管機構、交易所或法院的規定及規則、守則、決定、指引、要求、命令或建議(「**規則**」)之要求(包括但不限於有關證券交易、利益或其他資料的披露、打擊洗黑錢及恐怖分子資金籌集之要求)；及
- (l) purposes directly related to any of the above. 與以上任何一項直接有關的用途。

5. ZY Securities will keep the Clients' personal data collected or held confidential but it may provide such data to the following parties (whether within or outside Hong Kong) to the extent legally permissible:

中陽證券對收集到及持有的客戶個人資料將會保密，但會於法律允許範圍內向下列人士（不論香港以內或以外）提供有關資料

- (a) any agent, contractor, broker or third party service provider who provides administrative, telecommunications, computer, payment, printing or securities trading, execution, clearing or settlement services, or other services in connection with the ordinary business of ZY Securities, to ZY Securities;
向中陽證券提供與其正常業務活動有關的行政、電訊、電腦、付費、印刷或證券交易、執行、結算或交收服務或其他服務之任何代理人、合約商、經紀或第三方服務提供者；
- (b) offices within the ZY Securities and any other person under a duty of confidentiality to ZY Securities which has undertaken to keep such information confidential and their respective professional advisers;
中陽證券的任何其他公司或分部，及已承諾將有關資料保密的對中陽證券有保密責任的任何其他人士，及其各自的專業顧問
- (c) any financial institution, broker or dealer with which a Client has or proposes to have dealings; 客戶與之有業務往來或擬有業務往來的任何財務機構、經紀或交易商；
- (d) any actual or proposed assignee of the ZY Securities or participant or sub-participant or transferee of the ZY Securities' rights in respect of the Clients;
中陽證券的任何實際或擬承讓人，或者中陽證券與客戶相關的權益之參與人、次參與人或轉讓人；
- (e) any credit reference agency and, in the event of default of the Clients, any debt collecting agency; 任何信貸資料服務機構及(在客戶失責的情況下)任何收數機構；
- (f) any person who provides or proposes to provide guarantee or security for the Client's obligations to ZY Securities
為客戶對中陽證券所負責任而提供或擬提供擔保或保證的任何人士；
- (g) any governmental, regulatory or supervisory authority, exchange or court or any other person in any jurisdiction if required by or pursuant to any Rules which are binding on or applicable to ZY Securities or the relevant Client; and
如對中陽證券或相關客戶具約束力或適用的任何規則有所要求，在任何司法管轄區的任何政府、法規或監管機構、交易所或法院或任何其他人士；及
- (h) any other person or entity with the relevant Client's consent or approval. 經相關客戶同意或批准的任何其他人士或機構。

Use of Personal Data in Direct Marketing 在直接促銷中使用個人資料

6. ZY Securities intends to use the Clients' personal data in direct marketing, and ZY Securities may not use the personal data for such purpose unless the relevant Client's consent (or indication of no objection) has been obtained. In this connection, please note that:

中陽證券計劃將客戶的個人資料作直接促銷之用，而中陽證券須取得相關客戶的同意（或表示不反對），否則不得使用其個人資料作有關用途。就此而言，請注意：

- (a) the Client's name, email address, mobile phone number, residential phone number, facsimile number, correspondence address, postal code, age, nationality, date of birth, financial background, investment objectives, investment experience, risk tolerance profile, transaction pattern and behavior and product and service portfolio may be used by ZY Securities in relation to direct marketing; and
中陽證券擬在直接促銷中使用客戶的姓名、電郵地址、流動電話號碼、住宅電話號碼、傳真號碼、通訊地址、郵政編號、年齡、國籍、出生日期、財務背景、投資目標、投資經驗、風險承擔資料、交易模式及行為及產品及服務組合；及

- (b) the following classes of products, services and facilities may be marketed:
- any of the Brokerage Services & Products or the Facilities;
 - Brokerage Services & Products, Facilities, deposit, financial, trust, loan, insurance and related products and services of other companies within ZY Securities
 - customer reward, loyalty or privilege programs of ZY Securities and related services and products; and
 - promotional or social events in relation to any of the above.

以下類別的產品、服務及融通安排乃擬促銷之項目：

- 任何經紀服務及產品或融通；
- 中陽證券內的經紀服務及產品、融通、存款、金融、信託、貸款、保險及相關產品或服務；
- 中陽證券的客戶獎賞、忠誠或專享優惠計劃及有關服務及產品；及 ● 與上述任何一項有關的推廣或交際活動。

7. ZY Securities also intends to provide the Clients' personal data referred to in paragraph 6(i) to any other companies within the ZY Securities for their use in direct marketing in relation to their products, services and facilities described in paragraph 6(ii), and ZY Securities may not do so unless the relevant Client's written consent (or indication of no objection) has been obtained. ZY Securities confirms that such data is not provided by ZY Securities to the other companies within the ZY Securities for gain.

中陽證券並計劃向中陽證券內任何其他公司提供第 6(i)段所述的客戶個人資料，供其在直接促銷其第 6(ii)段所述的產品、服務及融通安排時使用，而中陽證券須取得相關客戶的書面同意(或表示不反對)，否則不得提供該些資料。中陽證券確認其向中陽證券內的其他公司提供有關資料，並不為獲取利益。

8. If a Client objects to the use of his/her personal data in, or provision of the same for use in, direct marketing or wishes ZY Securities to cease such use or provision, the Client may tick the boxes of objection below on signing of this notice, email or otherwise notify ZY Securities in writing by mailing or fax to the address or fax number provided in paragraph 10. ZY Securities will then cease such use or provision without any charge. The Client's consent may also be given selectively (in relation to the kinds of personal data, classes of marketing subjects and classes of data transferees).

如客戶反對其個人資料被用作或被提供用作直接促銷之用，或希望中陽證券停止使用或提供其個人資料作直接促銷之用，客戶可在簽署本通知書時填選以下的反對空格，以電郵或以書面方式透過郵寄或傳真至第 10 段所述的地址或傳真號碼以通知中陽證券。中陽證券將停止有關使用或提供而不作收費。客戶亦可選擇性地(對個人資料的種類、促銷之項目的類別及資料受讓人的類別)給予同意。

Rights of Clients 客戶權利

9. Under and in accordance with the provisions of PD(O)O, any individual has the right to:
- to be informed whether ZY Securities holds data about him/her and the right of access to such data (and ZY Securities has the right to charge a reasonable fee for such data access request);
 - require ZY Securities to correct any data relating to him/her which is inaccurate; and
 - to ascertain ZY Securities' policies and practices in relation to personal data.

根據個人資料(私隱)條例的條文，任何個人均有權：

- 獲告知中陽證券是否持有其資料及其要求查閱有關資料的權利(中陽證券有權就查閱資料的要求收取合理費用)；
- 要求中陽證券更改任何與其有關的不準確的資料；及 ● 查明中陽證券有關個人資料的政策及慣例。

10. The person to whom the requests mentioned in paragraphs 8 and 9 are to be addressed is as follows:

The Data Protection Officer
ZHONG YANG SECURITIES LIMITED

Unit 1101, 11/F, No.118 Connaught Road West, Hong Kong

Fax No.: (852) 28363825 Tel

No.: (852) 31070731

Email: cs@zyzq.com.hk

上述第 8 及 9 段所提及的要求須向以下人士提出：

香港干諾道西 118 號 1101 室

中陽證券有限公司資料保護主任

收

傳真號碼: (852) 28363825

電話號碼: (852) 31070731

電郵: cs@zyzq.com.hk

11. This notice may be revised, amended or supplemented from time to time by ZY Securities. The most up-to-date version of this notice can be found in the official website of ZY Securities or available from ZY Securities on request.

中陽證券會不時修訂、修改或補充本通知書。本通知書的最新版本可於中陽證券的官方網頁下載或由中陽證券應要求提供。