

PRIVACY POLICY

This Statement is provided to the Client as individual Client of the Company in accordance with the requirements of the Hong Kong Personal Data (Privacy) Ordinance (Cap. 486). Terms defined in this statement have the same meaning as in the Securities Client Agreement.

1. DISCLOSURE OBLIGATION

- 1.1 From time to time, it is necessary for the Client to supply the Company with data in connection with the opening or continuation of the Account and the establishment or continuation of credit facilities (if any) or provision of securities brokerage, and nominee and services. At the same time, some of the data are collected pursuant to laws, regulations, rules or codes binding on the Company or its Associates.
- 1.2 Failure to supply such data may result in the Company being unable to open or continue accounts or establish or continue credit facilities (if any) or provide securities brokerage, and nominee services.
- 1.3 It is also the case that data are collected from the Client in the ordinary course of the continuation of the business relationship.

2. USE OF PERSONAL DATA

2.1 Users

All personal data held by the Company relating to the Client, the Client's agent(s) or the Client's guarantor(s) (if any) (whether provided before or after the date the Client receives the Securities Client Agreement containing this information) may be used by any of the following companies or persons (each, a "**User**")

- (i) Lego Securities Limited and/or any of its Associates;
- (ii) any director, officer or employee or agent of the Company and/or any of its Associates;
- (iii) any persons (such as lawyers, advisers, nominee, custodian, auditors etc.) authorized by the Company when carrying out the Client's Instructions and/or the business of the Company;
- (iv) any actual or proposed assignee of any rights and obligations of the Company and/or any of its Associates in relation to the Client;
- (v) any governmental, regulatory or other bodies or institutions, whether as required by law or regulations applicable to the Company and/or any of its Associates;
- (vi) any Correspondent Agent

2.2 Purposes

All personal data concerning the Client may be used by any User for the following purposes:

- (i) carrying out new or existing client verification and credit checking procedures and assisting other financial institutions to do so;

- (ii) on-going Account administration, including the collection of amounts due, enforcement of security, charge or other rights and interests;
- (iii) designing financial services or related products or marketing financial services or related products to the Client;
- (iv) transfer of such data to any place outside Hong Kong
- (v) comparison with the Client's personal data (irrespective of the purposes and sources for which data were collected, and whether collected by a User or any other person) for the purpose of: (A) credit checking; (B) data verification; and/or (C) otherwise producing or verifying data which may be used for the purpose of taking such action that a User or any other person may consider appropriate (including action that may relate to the rights, obligations or interest of the Client or any other person);
- (vi) providing on the terms of any other agreements and services relating to the Client;
- (vii) any purpose relating to or in connection with compliance with any law, regulation, rules, codes binding on the Company, court order or order of any regulatory body, and
- (viii) investigating suspicious transactions;
- (ix) any other purpose relating to the execution of the Client's Instructions or in connection with the business or dealings of the Company and/or any of its Associates.

2.3 Use of Data in Direct Marketing

The Company intends to use and/or transfer the Client's data to its Associates for direct marketing and the Company requires the consent (including no objection) of the Client for that purpose. In this connection, please note that:

- (i) the name, contact details, portfolio information, transaction pattern and financial background of the Client may be used in direct marketing of investment or financial related products and services of the Company and/or its Associates; and
- (ii) if a Client does not wish the Company to use and/or transfer the Client's data for use in direct marketing, the Client may, without charge, exercise the right to opt-out.

3. RIGHTS OF ACCESS AND CORRECTION

The Client has the right to have access to and correction of the Client's personal data as set out in the Personal Data (Privacy) Ordinance. In general, and subject to certain exemptions, the Client is entitled to:

- (i) enquire whether Lego Securities Limited holds personal data in relation to the Client;
- (ii) request access to the Client's personal data within a reasonable time, at a fee which is not excessive, in a reasonable manner and in a form that is intelligible;
- (iii) request the correction of the Client's personal data

- (iv) be given reasons if a request for access or correction is refused, and object to any such refusal.