

個人資料收集聲明

1. 收集個人資料

此“個人資料收集聲明”適用於通華金融服務有限公司、通華金融控股有限公司及其他成員公司（“我們”或“本集團”）。本集團承諾會確保閣下提供給我們的個人資料受到保護。根據香港《個人資料（私隱）條例》制定的資料保護原則，本集團必須告知閣下我們將如何使用所獲得的個人資料及使用流程。

閣下可選擇是否提供個人資料，若閣下申請的產品及服務需要基於閣下的個人資料作批核及/或處理，而閣下未能提供，本集團可能不能為閣下提供有關的產品及服務。

2. 收集個人信息資料目的

就開立或延續帳戶、設立或延續本集團提供的產品及服務，或遵守任何法例，閣下需不時向本集團提供有關個人資料。

3. 收集個人資料的用途

- i. 考慮及處理對產品及服務的申請；
- ii. 確保閣下維持良好的信譽；
- iii. 提供及處理產品及服務的日常運作，包括但不限於執行閣下的指示、客戶服務、或服務時確認閣下的身份；
- iv. 為閣下設計相關服務或有關產品；
- v. 就適用於本集團的境內或境外法律與金融監管機構或行業組織發出的指引，履行貯存、披露及使用資料規定的義務；
- vi. 協助預防、偵查或調查罪行或潛在的犯罪活動。
- vii. 市場營銷、推銷或直接促銷服務及產品（詳情請參閱第 5 節）。
- viii. 向閣下追討欠款（如有及如需要）。
- ix. 與上述有關的用途。

4. 披露個人資料

本集團持有閣下的資料會予以保密，但可能會把閣下的個人資料提供給本集團任何其他成員公司及其他向本集團提供服務（例如付款、收款、結算、電訊、信息技術服務、文檔管理、法律）的金融機構、供應商或合作夥伴。

為提供閣下所需的產品或服務或完成交易，閣下的個人資料有可能被傳送至海外的公司。

本集團有時會與外部的公司簽約以為閣下提供所需產品和服務。這類公司的業務通常均包括或與以下服務內容有關：匯款服務（包括國際資金轉帳）、信息技術服務和文檔管理。在此情況下，本集團會在合同中確保該外部公司遵守《個人資料（私隱）條例》的約束。

本集團在取得閣下的同意後進行信譽和/或背景調查時，可能會從信譽和背景調查中介處獲取閣下的個人資料，或向該中介機構披露閣下的個人資料。本集團僅會提供與此類產品或服務有密切關聯的個人資料，並確保嚴格遵守保密要求。

如果本集團需要將閣下的個人資料披露給在國外營運的外部公司，我們確保該資料會受到法律或合同條款的保護，且該法律或合同的私隱原則與資料保護原則一致。

此外，本集團認真承擔保護閣下個人資料的義務，並只會與和我們有同樣道德信念的供應商和業務夥伴合作。

5. 市場營銷、推廣或直接促銷

本集團擬把閣下個人資料用於直接促銷，而該用途須得到閣下的同意（包括表示不反對）。請注意：

- i. 未獲閣下同意，本集團不會向任何第三方轉移或披露閣下的個人資料作直接促銷用途；
- ii. 本集團可能會不時轉移或披露閣下的姓名、聯絡資料、產品及服務組合資料、統計數據、交易模式及行為予本集團於香港及/或海外的辦事處，以用於直接促銷與本集團相關的服務及/或產品；
- iii. 直接促銷的服務及/或產品包括但不限於有關本集團任何其他成員公司現有及/或將推出的服務及/或產品的最新資訊、活動及優惠推廣；
- iv. 為進行上述直接促銷，本集團可能委託第三方數據處理者或服務供應商（包括但不限於數據公司、電訊公司及資訊科技公司）代為執行；
- v. 若閣下明確拒絕，本集團不會向閣下發送促銷資料。若閣下於任何時間不欲本集團使用閣下的個人資料作上述直接促銷用途或對本集團使用閣下的個人資料有任何查詢，可隨時聯絡本集團（發送電郵至：acct@allinpayhk.com或郵寄至：中國香港特別行政區九龍觀塘敬業街55號皇廷廣場15C）。閣下提出該等要求或查詢時，應明確列出其個人資料詳情。一般來說，本集團可於閣下發出通知後的14個工作天內回覆或完成相關拒收促銷訊息手續。

6. 個人資料的安全、準確和保留

本集團採取合理的預防措施，以防止丟失、盜用、未經授權的獲取或破壞閣下的個人資料。本集團亦採取合理步驟，以確保本集團持有閣下的個人資料準確及完整，而保留時間將不會超過達至原來目的實際所需。

7. 查閱及改正資料

閣下可聯絡本集團（發送電郵至：acct@allinpayhk.com或郵寄至：中國香港特別行政區九龍觀塘敬業街55號皇廷廣場15C），以查閱或更正資料的要求，本集團有權就處理任何查閱或提供有關資料要求而向閣下收取合理費用。

8. 其他事宜

如果閣下不是自然人，閣下應確保貴公司/實體的董事、高級職員、股東、受益所有人、授權簽署人、僱員、調解員、法律顧問、出資人和受益人以及其他相關、關聯或關聯的人員在閣下或閣下代表向閣下提供任何閣下的個人資料並向閣下提供與閣下帳戶有關的任何個人資料之前，閣下已知悉本集團收集個人資料聲明所載的事宜。

2020年9月

PERSONAL INFORMATION COLLECTION STATEMENT

1. Collection of personal data

This "Personal Information Collection Statement" applies to Allinpay Financial Services Ltd., Allinpay Financial Holdings Co., Ltd. and other member companies ("we", "us" or "our group"). Our group promises to ensure that the personal information you provide to us is protected. According to the Data Protection Principles established by Hong Kong's "Personal Data (Privacy) Ordinance", our group must inform you how we will use the personal information we have obtained and the process flow.

You can choose whether you want to provide personal data to us or not. If the products and services you apply for need to be approved and/or processed based on your personal data, and you fail to provide them, then our group may not be able to provide you with the relevant products and services.

2. Purpose of collecting personal information

In order for us to open or renew an account, establish or renew the products and services provided by our group, or comply with any law, you need to provide our group with relevant personal information from time to time.

3. Purpose of collecting personal information

- i. Consider and process applications for products and services;
- ii. Ensure that you maintain good reputation;
- iii. Provide and process the daily operations of products and services, including but not limited to confirming your identity when performing your instructions, providing customer service;
- iv. Design related services or products for you;
- v. Fulfil the obligations in relation to storage, disclosure and use of information in accordance with the guidelines issued by local or overseas laws and regulators or industry organizations applicable to our group;
- vi. Assist in preventing or investigating crimes or potential criminal activities;
- vii. Marketing, promotion or direct promotion of services and products (see Section 5 for details);
- viii. Recover the debt from you (if any and if necessary);
- ix. Uses related to the above.

4. Disclosure of personal information

Our group will keep your information confidential, but may provide your personal information to any other member companies of our group and other financial institutions, suppliers or partners who provide our group with services (such as payment, collection, settlement, telecommunication, information technology, document management, legal).

In order to provide the products or services you need or complete transactions, your personal information may be transferred to overseas companies.

Our group may from time to time contracts with other companies to provide you with the products and services you need. The business of such companies usually includes or is related to the following services: remittance services (including international fund transfers), information technology services and document management. In this case, our group will ensure that they will comply with the "Personal Data (Privacy) Ordinance" and such requirement will be stated in the contract.

Our group may obtain your personal information from credit agencies and intermediaries when conducting credit and/or background check after obtaining your consent, or disclose your personal information to them. Our group will only provide personal information that is closely related to such products or services and ensure strict compliance with confidentiality requirements.

If our group needs to disclose your personal information to external parties operating abroad, we will ensure that the information will be protected by laws or contract terms, and the laws and privacy principles in the contract are the same as data protection principles.

In addition, our group takes seriously the obligation to protect your personal information and will only co-operate with suppliers and business partners who have the same ethical beliefs as us.

5. Marketing, promotion or direct sales

Our group may use your personal data for direct marketing, and this use requires your consent (including expressing no objection). Please note that:

- i. without your consent, our group will not transfer or disclose your personal data to any third party for direct marketing purposes;
- ii. our group may transfer or disclose your name, contact information, product and service portfolio information, statistical data, transaction patterns and behaviours from time to time to our group's other offices in Hong Kong and/or overseas to directly promote services and/or products related to our group;
- iii. directly promote services and/or products including, but are not limited to the latest information, activities, and promotional offers regarding the current and/or upcoming services and/or products of our group;
- iv. in order to carry out the above-mentioned direct promotion, our group may engage third-party data processors or service providers (including but not limited to data companies, telecommunication companies and information technology companies) to perform on our behalf.

If you explicitly refuse, our group will not send you promotional materials. If you do not want our group to use your personal data for the above-mentioned direct marketing purposes or have any enquiries about our group's use of your personal data, you can contact our group at any time (send an email to: acct@allinpayhk.com or mail to: 15C, King Palace Plaza, 55 King Yip Street, Kwun Tong, Kowloon, Hong Kong Special Administrative Region, China). When you make such requests or inquiries, you should clearly state details of your personal data. Generally speaking, our group can reply or complete the relevant procedures for your refusing to receive promotional messages within 14 working days after your notification.

6. Security, accuracy and retention of personal data

Our group takes reasonable precautions to prevent loss, misappropriation, unauthorized access or destruction of your personal data. Our group also takes reasonable steps to ensure that the personal data held by us is accurate and complete, and the retention time will not exceed the actual need of the original purpose.

7. Access and correction of information

You can contact our group (send an email to: acct@allinpayhk.com or post to: 15C, King Palace Plaza, 55 King Yip Street, Kwun Tong, Kowloon, Hong Kong Special Administrative Region, China) to view or correct your information. Our group has the right to charge you a reasonable fee for processing any request for access or provision of relevant information.

8. Other matters

If you are not a natural person, you should ensure that before the directors, officers, shareholders, beneficial owners, authorized signatories, employees, mediators, legal advisers, funders, beneficiaries and other individuals of your company provide you or your representative with their personal information in relation to your account, you are aware of the details set out in our group's Personal Information Collection Statement.

September 2020