

## **PRIVACY POLICY**

### Key Consensus Personal Information Collection and Privacy Policy Statements

#### DEFINITIONS

Unless the context otherwise requires, the following terms when used in this Privacy Policy shall have the meanings ascribed thereto as follows:

- (a) "Personal Data" means personal data as defined in the Personal Data (Privacy) Ordinance (Chapter 486) of the Laws of Hong Kong.
- (b) "Key Consensus Group" means [Key Consensus Limited], together with its subsidiaries and associated companies, including, for the avoidance of doubt, any subsidiaries and associated companies of Key Consensus.

#### USES/PURPOSE OF COLLECTION

Key Consensus Group will devote effort to maintain Personal Data held by Key Consensus Group confidential. We will not share your information for commercial purposes with third parties unless you give us your prior permission to do so or such disclosure is within the ambit of permitted disclosures under the prevailing laws/ guidelines. We will take such reasonable steps to protect the confidentiality of your information and to safeguard your privacy. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Nevertheless, by submitting Personal Data you agree that any such data may be used for the following purposes:

- (a) the processing of applications for, and daily operation of services provided by the Key Consensus Group to you or third party (if applicable);
- (b) client relationship management (including but not limited to loyalty programs or privileges and rewards schemes);
- (c) maintaining your credit and instruction history for present and future reference;
- (d) enhancing, improving, designing or launching existing or new trust and company services or related products for your use;
- (e) if you have consented (including an indication of no objection) to the use of your personal data for direct marketing purposes by members of the Key Consensus Group and/or entities outside the Key Consensus Group in the Account Application or in other application form(s) or otherwise, marketing and related services, products or goods;
- (f) determining the amount of indebtedness owed to you or to Key Consensus Group;
- (g) collecting of amounts outstanding from you;
- (h) meeting any requests or requirements to make disclosure under applicable laws and regulations;
- (i) any other purpose disclosed in the website(s) or an application form of a member of the Key Consensus Group from time to time;
- (j) providing personalised advertising to you on third party websites (this may involve us aggregating your data with data of others);

- (k) commencing, defending or otherwise participating in any legal or administrative proceedings or inquiry before any court or competent authority;
- (l) seeking or obtaining banking, financing, insurance, administrative, custodian, telecommunications, computer, payment, debt collection or securities clearing, audit, business consulting, outsourcing, or other services to Key Consensus Group in connection with the operation of its business; and
- (m) any other lawful purpose directly or indirectly relating or incidental to any of the above.

#### CLASSES OF POTENTIAL TRANSFEREES

Key Consensus Group will devote effort to maintain Personal Data of yours or, where appropriate, third party, held by Key Consensus Group confidential but Key Consensus Group may, at its sole discretion, provide such information to the following persons for direct marketing purposes (where consented (including an indication of no objection) by you) or any other purposes permitted by this Privacy Policy:

- (a) any local or overseas law enforcement agency, industry body, regulator or authority;
- (b) any agent, contractor or third party service provider (whether in Hong Kong or elsewhere) who provides banking, financing, insurance, administrative, custodian, telecommunications, computer, payment, debt collection or securities clearing, audit, business consulting, outsourcing, or other services to Key Consensus Group in connection with the operation of its business;
- (c) any branch or office of any member of the Key Consensus Group, whether in Hong Kong or elsewhere;
- (d) any person acting or proposing to act as surety;
- (e) any person under a duty of confidentiality to Key Consensus Group (or any member of the Group) or who has undertaken to keep such information confidential;
- (f) any financial institution with which you have or propose to have dealings;
- (g) any third party who you consent to us sharing the data with;
- (h) credit reference agencies and, in the event of default, to debt collection agencies;
- (i) any other purpose disclosed in the website(s) or an application form of a member of the Key Consensus Group from time to time;
- (j) any actual or proposed assignee or transferee of any member of Key Consensus Group;
- (k) any person in accordance with applicable laws and regulatory requirements including through or pursuant to any rules, judgment, decision or ruling of the courts, arbitral tribunals, governmental, regulatory or other bodies or institutions, whether as required by the laws and regulatory requirements that are applicable to any member of the Key Consensus Group; and
- (l) Key Consensus Group may from time to time transfer the data relating to you to a place outside Hong Kong, and share the anonymised data with other parties not listed above for any of the purposes set out in above.

#### POTENTIAL PERSONAL DATA TO BE COLLECTED

We collect your data (i) when you interact with us and use our products and services; (ii) visit our websites (see our Use of cookies policy on our website for details of how we use

cookies); and (iii) from other people and companies, including other Key Consensus Group companies, with the following personal data, including but not limited to:

- (a) transaction data about bank account details and payments to and from you and other details of products and services you have purchased from us;
- (b) technical data including internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our website;
- (c) biometric data such as your voice ID, thumb print and facial recognition data;
- (d) your geographic data and location data based on your mobile or other electronic device;
- (e) data from people who act for you or who you deal with through our services; and
- (f) data from public sources, credit reference, debt collection and fraud prevention agencies, and other aggregators;

If you don't give us data then we may be unable to provide products or services. We may also generate data about you

- by combining information that Key Consensus Group have collected about you
- based on the analysis of your interactions with us
- through the use of cookies and similar technology when you access our website or apps

As you interact with our website, we will automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.

#### DIRECT MARKETING

This is when we use your data to send you details about financial, insurance or related products, services and offers provided by us or our co-branding, rewards or loyalty programme partners or charities.

We may use data such as your demographics, the products and services that you're interested in, transaction behaviour, portfolio information, location data, social media data, analytics and information from third parties when we market to you.

#### ACCESS AND RECTIFICATION OF PERSONAL DATA

You have the right to request access to, rectification, and erasure of information about you held by Key Consensus Group, as well as to request objection and restriction of processing of your personal data in certain circumstances. You also have the right to withdraw your consent to the use of your personal data (though this may affect our services to you). If you wish to access or rectify your personal data held by Key Consensus Group, please send your written request to the Privacy Data Officer via [support@keyconsensus.com](mailto:support@keyconsensus.com). Key Consensus Group may charge a reasonable fee for processing any data access request.

In the unlikely event of a data breach pertaining to the unauthorised processing of Personal Data or such other information provided by you that is in our possession or control, we will duly submit a data breach notification to the relevant authority(ies) if required by relevant and applicable laws and regulations.