

## The Personal Data (Privacy) Ordinance - Personal Information Collection (Customers) Statement

In compliance with the Personal Data (Privacy) Ordinance ("the Ordinance"), BEA Union Investment Management Limited ("BEA Union Investment") would like to inform you of the following:

- (1) From time to time, it is necessary for customers to supply BEA Union Investment with data in connection with the opening or continuation of accounts and the establishment or continuation of financial services provided by BEA Union Investment.
- (2) Failure to supply such data may result in BEA Union Investment being unable to open or continue accounts or establish or provide financial services.
- (3) The purposes for which data relating to a customer may be used are as follows:
  - (i) processing and considering applications for products and services and the daily operation of products and services provided to customers;
  - (ii) marketing products and services (please see further details in paragraph (5) below);
  - (iii) verifying the data or information provided by any other customer or third party;
  - (iv) determining amounts owed to or by customers;
  - (v) enforcing customer's obligations, including but not limited to the collection of amounts outstanding from customers;
  - (vi) complying with the obligations, requirements or arrangements for disclosing and using data that apply to BEA Union Investment that it is expected to comply according to:
    - a) any law binding or applying to it within or outside the Hong Kong Special Administrative Region ("Hong Kong") existing currently and in the future (e.g. the Inland Revenue Ordinance and its provisions including those concerning automatic exchange of financial account information);
    - b) any guidelines or guidance given or issued by any legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations of financial services providers within or outside Hong Kong existing currently and in the future (e.g. guidelines or guidance given or issued by the Inland Revenue Department including those concerning automatic exchange of financial account information);
    - c) any present or future contractual or other commitment with local or foreign legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations of financial services providers that is assumed by or imposed on BEA Union Investment by reason of its financial, commercial, business or other interests or activities in or related to the jurisdiction of the relevant local or foreign legal, regulatory, governmental, tax, law enforcement or other authority, or self-regulatory or industry bodies or associations;
  - (vii) complying with any obligations, requirements, policies, procedures, measures or arrangements in accordance with any group-wide programmes for compliance with sanctions or prevention or detection of money laundering, terrorist financing or other unlawful activities; and
  - (viii) purposes relating thereto.
- (4) Data held by BEA Union Investment relating to a customer will be kept confidential but BEA Union Investment may provide such information to the following parties for the purposes set out in paragraph (3):-
  - (i) any agent, contractor or third party service provider who provides administrative, telecommunications, computer, payment or securities clearing or other services to BEA Union Investment in connection with the operation of its business;
  - (ii) any other person under a duty of confidentiality to BEA Union Investment including a group company of The Bank of East Asia, Limited and Union Asset Management Holding AG which has undertaken to keep such information confidential;
  - (iii) any person to whom BEA Union Investment is under an obligation to make disclosure under the requirements of any law binding on BEA Union Investment or under and for the purposes of any guidelines issued by regulatory or other authorities with which BEA Union Investment are expected to comply.Such information may be transferred to a place outside Hong Kong.

### (5) USE OF DATA IN DIRECT MARKETING

BEA Union Investment intends to use a customer's data in direct marketing and BEA Union Investment requires the customer's consent (which includes an indication of no objection) for that purpose. In this connection, please note that:

- (i) the name, contact details, products and services information, investor category, investment experience, and demographic data of a customer held by BEA Union Investment from time to time may be used by BEA Union Investment in direct marketing;
- (ii) investment related products and services may be marketed.

If a customer does not wish BEA Union Investment to use his data in direct marketing, the customer may exercise his opt-out right by notifying BEA Union Investment.

A customer may provide his consent for BEA Union Investment to use his data in direct marketing by notifying The Compliance Officer of BEA Union Investment (please see contact details in paragraph (8) below).

- (6) Under and in accordance with the terms of the Ordinance, any individual has the right: -
  - (i) to check whether BEA Union Investment holds data about him and of access to such data;
  - (ii) to require BEA Union Investment to correct any data relating to him which is inaccurate; and
  - (iii) to ascertain BEA Union Investment's policies and practices in relation to data and to be informed of the kind of

personal data held by BEA Union Investment.

- (7) In accordance with the terms of the Ordinance, BEA Union Investment has the right to charge a reasonable fee for the processing of any data access request.
- (8) The person to whom requests for access to data or correction of data or for information regarding BEA Union Investment's Privacy Policy Statement and kinds of data held are to be addressed is as follows:
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|---|-----------|--|
| The Compliance Officer                    | Telephone | : 3608 0306  |
| BEA Union Investment Management Limited   | Fax       | : 3608 6116  |
| 5/F, 10 Des Voeux Road Central, Hong Kong | Website   | : <a href="http://www.bea-union-investment.com">www.bea-union-investment.com</a> |
- (9) Customers may, at any time, request BEA Union Investment cease using their personal data for direct marketing purposes by writing to The Compliance Officer at the address or fax number provided in paragraph (8).
- (10) After closure of account/termination of service, BEA Union Investment shall continue to hold data relating to the customer(s) for a period of seven years or such other period as prescribed by applicable laws and regulations.
- (11) Nothing in this statement shall limit the rights of customers under the Ordinance.

(05/2018)