

Circular relating to the Personal Data (Privacy) Ordinance of Hong Kong (“Circular”)

This Circular explains how CITIC Securities Brokerage (HK) Limited (“CSBHK”), CITIC Securities Futures (HK) Limited (“CSFHK”) and its Affiliates (hereinafter collectively referred to as “CSHK” or “we” or “us”) collect and process personal data collected from Customers, guarantors, security providers and other individuals from time to time (collectively, “Data Subjects” and each a “Data Subject”).

Capitalized terms that are not otherwise defined in this Circular shall have the same meaning in the Terms and Conditions for Securities Trading, or the Terms and Conditions for Securities Trading (Professional Investor – Institutional) or (in the case of CSFHK) the Terms and Conditions for Futures and Options Trading (each, a “Terms and Conditions”), and/or other relevant agreements between the Customer and CSHK.

Personal data we collect

1. Personal data means “information which relates to a living individual and from which it is practicable for the identity of the individual to be directly or indirectly ascertained”. It must also exist in a form which access to or processing of is practicable. [Source: Section 2 of PDPO]. It does not include personal data where the identity has been removed (i.e. anonymous data).

At CSHK, we collect, save, use and transfer different kinds of personal data (collectively, “Data”). Broadly speaking, the Data will include (without limitation) the following:

Type of Data	Description
Identity	Name, date of birth, place of birth, gender, ID/passport number and copies and (if applicable) marital status, family members, relationships with politically exposed persons
Contact	Home address, mailing address, telephone numbers, fax number, email address
Financial	Employment/business information, (if applicable) directorships, annual income, estimated net worth, source of wealth, source of funds, proof relating to portfolio of financial assets
Investment	Investment experience, investment objective, investment target, anticipated level of activity, risk profile, product knowledge
Services/Transactional	Details about orders, instructions, transactions, services, bank accounts, securities accounts, payments and remittances
Usage	Information about use of our website, on-line platforms, mobile applications
Profile	Usernames and passwords, feedback and survey responses
Cookies/logs/cache/pixel tags	A visitor’s name, email address, MAC addresses, IP addresses (and domain names), browser software, types and configurations of his/her browser, language settings, geo-locations, operating systems, referring website, pages and content viewed and durations of visit
Internal control	Data from name-screening, credit-checks, background checks, professional qualifications, negative news checks and electronic certification
Audio visual	CCTV footage, photographs, tape recordings

How we collect data

2. We may collect Data from a Data Subject during contact or in the ordinary course of his/her relationship with us, for example, when a Data Subject gives us his/her name card or contact details, deposits funds or securities, effects transactions through CSHK, transfers funds or securities, operates the Securities Account, discusses matters with CSHK’s staff or account executives or contacts CSHK to

arrange margin facilities or other services, negotiate business with CSHK, or to amend /update/correct his/her Data or other account information. We may also use various methods to collect Data from Data Subjects, such as:

Method	Description
Direct request	We request various Data at various stages of our relationship with a Data Subject. For example, Customers are required to provide us with various Data when opening account with us, conducting transactions, enabling us to conduct various checking. Any failure to do so may result in CSHK being unable to open or maintain the accounts, effect any transactions, grant or continue margin facilities or provide any services to the Customer.
Electronic	Our systems will use, transfer, monitor, record and otherwise process communications containing Data passing through our electronic systems, on-line platforms, mobile applications in any form, including emails.
Correspondence	We also collect Data when you communicate with us by email/post or other means.
Telephone	We may also record our telephone conversations with a Data subject for regulatory, internal control, risk management and audit purposes
Cookies/logs/cache/pixel tags	We use cookies/tools on our website and on-line platforms. Cookies are unique identifiers placed on a computer or other device by a web server, which contains information that can later be read by the server that issued the cookie.
Third party vendors	We request and receive various Data from third party vendors who provide services regarding name-screening, electronic certification, background checks and credit checks.
Public sources	We also access Data through publicly available sources e.g. government registries, professional bodies, regulators, sanction lists, public disclosure portals/data base, social media and services on the Internet.

Purposes for Collecting Data

3. CSHK may use, store, process and transfer Data for one or more of the following purposes from time to time:

- opening and maintaining of Securities Accounts and other accounts;
- the daily operation of account(s), services and margin facilities provided to the Data Subject or to the borrower when the Data Subject is a guarantor or security provider for the relevant facilities;
- effecting transactions or carrying out other Instructions;
- complying with regulatory and internal requirements relating to client onboarding due diligence, verification and ongoing reviews, prevention and detection of money laundering, terrorist financing or other unlawful or improper activities, fraud detection, sanctions monitoring;
- complying with court orders and legal requirements, obligations, requirements or arrangements which apply to CSHK, its Affiliates, CITIC Securities Co., Ltd. (“**CITICS**”) or any group companies of CITICS or CSI, including but not limited to treaties, agreements, reciprocal principles and other arrangements between Hong Kong Government and other foreign governments (including those relating to tax reporting and automatic exchange of financial account information);
- responding to requests from public or government authorities (which may include without limitation, regulators, law enforcement agencies, securities exchange or other similar agencies or authorities, tax authorities, hospital authority, social welfare department and other authorities in and outside Hong Kong) to cooperate with any enquiry or investigation;

- conducting credit checks, monitoring and review, ascertaining financial situation and carrying out matching procedures (as defined in the PDPO) in respect of Data Subjects, and enabling or assisting any other person to do so;
- creating and maintaining credit history, credit scoring models and other analysis of the Data Subjects (whether or not there exists any relationship between them and any CSHK company) for present and future reference;
- compliance checking, risk management, internal control and audit purposes (including review and monitoring of account activities, transactions, margin and other positions and data and conducting audits (both external and internal));
- customer relationship management and processing of relevant data;
- ascertaining and understanding the investment experience, investment objectives, financial position, investment time horizon, risk tolerance level, liquidity needs, diversification needs and other circumstances of Customers;
- designing financial products or services for use of Customers;
- answering enquiries from (as the case may be) counterparties, product issuers/guarantors, dealers, distributors, collective investment schemes or their managers, administrators, investment managers, trustees or custodians, Custodial Agents, other custodians or agents or any such party's nominees or affiliates and providing them with Data to enable them to recover debts and losses, enforce their other rights or to answer enquiries from regulators, securities exchanges or other government/judicial authorities;
- direct marketing and promotion of existing and future services or products (e.g. financial services or products) of CSHK, CITICS or CSI or any group companies of CITICS or CSI, in respect of which CSHK may or may not be remunerated (please also refer to the section on "Direct Marketing" below);
- determining the amount of indebtedness owed to or by a Data Subject and enforcing the same, including without limitation the collection of debts, recovery of losses and other amounts outstanding from a Data Subject, enforcement of security, charge or other rights and interests in favour of any CSHK company, CITICS, CSI or any group companies of CITICS or CSI, commencement and conduct of legal proceedings and enforcement proceedings and making disclosures in demand letters, claims and court documents;
- enabling CSHK's actual or potential assignee, transferee, participant or sub-participant of CSHK's rights or business in respect of the Data Subject or his/her account(s) to evaluate the matters intended to be the subject of the assignment, transfer, participation or sub-participation;
- data processing, back-up and archive;
- for the protection of any other legitimate interests of ourselves, our customers or those of another third party; and
- all other incidental and associated purposes relating to the above or to which Data Subjects may from time to time agree.

4. If we need to use any Data for a purpose unrelated to the above, we shall notify the Data Subject and seek his/her consent to allow us to do so. If the Data Subject is not our client, we may need to process his/her personal data in order to provide client services or facilities to our **Customer**, including the provision of margin financing. This personal data may be provided to us through the course of the matter for example, provided to us as part of a credit review process or provided by another third party (a credit reference agency). Data may even be transferred and used in legal proceedings commenced by us or other counterparties (such as a structured note issuer) to recover outstanding debts and Losses from a Data Subject (such as a holder of a structured note or (as the case may be) a guarantor in respect of a margin loan of a Customer).

Disclosure of Data

5. CSHK may provide Data to the following classes of persons for one or more of the purposes set out in paragraphs 3 and 4 above:

- CITICS and any of its group companies;
- CSI and any of its group companies;
- any nominees in whose name the Data Subject's securities or other assets may be registered;
- name-screening services/due diligence/data base service providers, electronic certification bodies and their registration authorities, Lightweight Directory Access Protocol service providers and identification agencies;
- any contractors, agents, service/solutions providers, software/application developers, banks, fund houses and insurance companies in or outside Hong Kong, which provide administrative, data processing, financial, computer, telecommunications, information technology, payment, clearing, settlement, professional or other services to CSHK or to any group companies of CITICS or CSI;
- any counterparties, product issuers/guarantors, dealers, distributors, collective investment schemes and their managers, administrators, investment managers, trustees and custodians, Custodial Agents, other custodians and agents and any such party's nominees and affiliates involved in transactions conducted by CSHK on behalf of the Data Subject;
- credit reference agencies, and, in the event of default, debt collection agencies;
- any party giving/proposing to give/who has given a guarantee or third party security to guarantee or secure the Data Subject's obligations;
- any actual or potential assignee, transferee, participant, sub-participant, delegate, or successor of the rights or business of CSHK;
- judicial bodies and public or government authorities (which may include regulators, securities exchange or other similar agencies or authorities, tax authorities, hospital authority, social welfare department and other authorities) in and outside Hong Kong;
- legal or other professional advisers and agents engaged by CSHK or its Affiliates;
- law enforcement bodies of Hong Kong (including but not limited to Hong Kong Police and Independent Commission Against Corruption) and those of other jurisdictions; and
- any party in respect of which such disclosure is requested and/or consented to by the Data Subject.

Direct Marketing

6. CSHK may use Data for direct marketing purposes and requires customer's consent (which includes an indication of no objection) before it could do so. CSHK may use the full name, contact details, products and services portfolio information, transaction pattern and behaviour, financial background, investment experience and background, risk profile and demographic data of a Data Subject for direct marketing purposes. The following classes of products, services and initiatives may be marketed to Data Subjects:

- financial products and services;
- insurance, credit card and related services and products;
- share ownership plan services;
- reward, loyalty or privileges programs and related services and products;
- products and services offered by CSHK's Affiliates or co-branding partners; and
- donations and contributions to charitable and/or non-profit organizations.

7. The above products, services and initiatives may be provided or solicited by:

- CSHK or its CSHK's Affiliates (in Hong Kong or outside Hong Kong);
- CITICS, CSI or any group companies of CITICS or CSI;

- third party financial institutions, insurers, securities and investment services providers;
- third party reward, loyalty, co-branding or privileges program providers;
- co-branding partners of CSHK or its Affiliates; and
- charitable or non-profit organizations.

CSHK intends to use and to provide the above-mentioned Data to all or any of the above parties for use by them in marketing those products, services and initiatives, and CSHK requires Data Subject's written consent (which includes an indication of no objection) for that purpose. CSHK may receive money or other benefits in return for providing the relevant Data to the above parties. When requesting the Data Subject's consent, CSHK will inform him/her if it will receive any money or other benefits in return for providing the Data to any other party.

8. If a Data Subject does not wish to have his/her Data used for direct marketing purposes, he/she may exercise his/her opt-out right by ticking the appropriate box in the Account Opening Form, or by notifying CSHK in writing. Please address opt-out requests to CSHK's Head of Compliance (contact details below). However, the right to make such a request is not applicable to the Data Subject if the direct marketing is addressed to the Data Subject in his/her capacity as a representative of a company or business and is not sent to the Data Subject in his/her individual or personal capacity.

Outsourcing

9. Other entities and third party service providers will also process Data. To the extent that CITICS, an Affiliate or third party service provider processes the Data, CSHK will ensure that they execute confidentiality agreements containing provisions preserving confidentiality and policies/procedures in place to comply with the PDPO and other applicable data privacy laws. Outsourcing arrangements are subject to due diligence and reasonably practicable monitoring to ensure an adequately high standard of data privacy protection throughout the life of the outsourcing.

Transfer of Data outside Hong Kong

10. CSHK may from time to time transfer Data to the Mainland and other jurisdictions for the purposes specified in paragraphs 3 and 4 above. Data transferred to another jurisdiction may be disclosed, processed, stored or maintained in accordance with the laws, rules, regulations, guidelines, directives, orders and practices applicable in that jurisdiction. For example, in so far as Data is transferred to CITICS for customer relationship management, trade, credit assessment, risk management, audit and data processing or other purposes, please be informed that the Data will be stored in the Mainland; the Data so stored is subject to the laws, regulations, orders and practices of the People's Republic of China ("PRC") and to access by PRC law enforcement agencies and regulators. The Data transferred to a region outside Hong Kong may not enjoy the same safeguards stipulated under Hong Kong laws. Restrictions on data access as stated in the contract between CSHK and CITICS or (as the case may be) other entities or service providers cannot override PRC laws or regulatory requirements or those of other jurisdictions.

Web-site

11. CSHK may collect, process and use Data of visitors to its website in order to provide improved products and services to visitors, to adapt business processes to customers' needs, and to direct visitors to the relevant product information and online trading platforms. Cookies are unique identifiers placed on a computer or other device by a web server, which contains information that can later be read by the server that issued the cookie. CSHK may use cookies on its website. The information collected (including but not limited to: visitor's logon ID, IP addresses (and domain names), browser software, types and configurations of his/her browser, language settings, geo-locations, operating systems, peripherals, referring website, pages and content viewed, and durations of visit) will be used for:

- analyzing our web-site's traffic;
- compiling aggregate statistics on how visitors reach and browse our websites;
- improving user experience;
- customer and user administration and marketing;
- informing visitors about our services and products; and
- gauging the effectiveness of our marketing initiatives.

Such information is collected anonymously and the visitor cannot be identified unless he/she has logged on as a customer/user. Session cookies enable our website to keep track of the visitor's movement from page to page so that he/she is not asked to provide the information already given to the site. Functionality cookies allow visitors to proceed through many pages of a site quickly and easily without having to authenticate or reprocess each new area he/she visits. Advertising cookies will allow CSHK to provide advertisements on our website which are as relevant to the visitor as possible, e.g. by selecting interest-based advertisements, or preventing the same advisement from constantly reappearing.

12. Most web browsers are initially set up to accept cookies. If you do not want to receive cookies, you can disable this function in your browser settings. However, by doing so, you may not be able to enjoy fully the benefits of our websites, and certain features may not work properly.

On-line/Mobile Trading Platforms

13. CSHK also offers on-line and mobile trading platforms to its Customers. CSHK may, during the process, collect, transmit, store and use technical, location and login and other personal data and related information about the Customer's device (e.g. MAC address and IP address), system and application software, and peripherals.

14. When Customers use any such trading platforms, CSHK and third party vendors/licensors may use audit logs, cache, cookies and/or pixel tags to collect such information and store the Customer's preferences. CSHK may use the information for various purposes (for instance, security purpose, to facilitate navigation or provision of software updates or product support, to display information more effectively, and to personalize the Customer's experience while using the platform, as well as for on-line tracking, customer relationship management, compliance monitoring and checking and risk management). CSHK may recognize the device used by the Customer in order to assist his use of the service or the mobile application. We may also gather statistical information about the usage of the service or mobile application in order to improve the design and functionality, understand how it is used and to assist CSHK with resolving issues regarding it. Cookies may further allow CSHK to select which of its advertisements or offers are most likely to be of interest to the Customer and display them while he/she is using the service or the mobile application. We may also use cookies in on-line and mobile advertising to track responses to our advertisements and to gauge the effectiveness of our marketing campaigns. Customers are advised to review the [Terms of Use](#) of the relevant trading platform or (as the case may be) the mobile application carefully before using it.

External links

15. If any part of the CSHK's website or platform contains links to other websites, those sites do not operate under this Circular. Visitors are advised to check the privacy statements of those websites to understand their policies on the collection, usage, transfer and disclosure of personal data.

Retention

16. CSHK follows retention policies to ensure that Data is retained only so long as required for the purposes for which it was collected, and as necessary to comply with applicable legal and regulatory requirements.

Access/Correction/Update

17. Subject to the Provisions of the PDPO, a Data Subject may ascertain whether CSBHK holds personal data of which he/she is the data subject and has the right to access and correct the Data held by CSHK. When handling a data access or correction request, CSHK will check the identity of the requestor to ensure that he/she is the person legally entitled to make the data access or correction request. Please address requests for access and/or correction of personal data to the Head of Compliance (contact details below). CSHK may charge a reasonable fee for complying with a data access request. CSHK may also refuse to comply with a data access or correction request in the circumstances specified in the PDPO.

18. Data Subjects may ascertain CSHK's policies and practices in relation to the Data and request to be informed of the type of personal data held by CSHK. Data Subjects may also request to be informed which items of the Data are routinely disclosed to credit reference agencies or debt collection agencies, and be provided with further information to enable the making of an access and correction request to the relevant credit reference agency or debt collection agency. In relation to Data which has been provided by CSHK to a credit reference agency, a Data Subject may instruct CSHK upon termination of an account by full repayment of all outstanding liabilities therein to make a request to the credit reference agency to delete such Data from its database, as long as the instruction is given within five years of termination and at no time did the account have a default of payment lasting in excess of 60 days within five years immediately before account termination. In the event the account has had a default of payment lasting in excess of 60 days the Data may be retained by the credit reference agency until the expiry of five years from the date of final settlement of the amount in default or five years from the date of discharge from a bankruptcy as notified to CSHK, whichever is earlier.

19. Data subjects and other third parties who provide (or authorize the provision of) Data to CSHK represent and warrant that such Data is true, accurate and complete and shall notify CSHK in writing immediately upon any changes in Data previously provided to CSHK.

Data Security Protection Measures

20. CSHK has implemented reasonable security measures to protect Data from risks such as illegal processing, destruction or accidental loss. We use electronic security measures to control access to Data, including the use of passwords, firewalls and mechanisms to encrypt Data, such that the information systems are authenticated and authorized prior to usage. CSHK has applied a record-keeping mechanism to maintain relevant records when processing or using Data, such as recording the purpose of processing, the type of Data Subject and the data recipient. We shall implement internal reviews on Data transfer and conduct regular random checks on Data transmission, organization, information systems and network security structures. CSHK has also taken reasonable measures to secure and control the physical security of Data or other confidential information, including but not limited to: fire prevention; prevention of smoke and water damage, fire and emergency alarm systems, password-locked files, protective devices or other equipment to prevent loss or unauthorized deletion of manually saved data, restricted access to prevent unauthorized access to Data and documents.

Miscellaneous

21. CSHK may, at any time and without prior notice, amend, update or modify this Circular, simply by notifying Data Subjects of such amendment, update or modification. If CSHK decides to do so, we shall post the revised version on our website. Any such change, update or modification will be effective immediately upon posting.

22. Nothing in this Circular shall limit your rights under the PDPO.

23. This Circular shall form an integral part of the Agreement and/or other contracts, agreements and other binding arrangements, which a Data Subject enters into with CSHK.

CITIC Securities Brokerage (HK) Limited 中信証券經紀(香港)有限公司 (CE No. AAE879)

CITIC Securities Futures (HK) Limited 中信証券期貨(香港)有限公司 (CE No. AHR752)

(Incorporated in Hong Kong with limited liability)

30 October, 2020

Enquiries:

Any enquiries regarding this Circular or CSHK's other personal data privacy policies or practices may be addressed to:

Head of Compliance
CITIC Securities Brokerage (HK) Limited
26th Floor, CITIC Tower
1, Tim Mei Road
Central, Hong Kong

csbpdpo@clsa.com