

GDPR Privacy Statement
歐盟個人資料保護規則(GDPR)私隱政策聲明

SinoPac Solutions and Services Limited (“SinoPac”) has issued this GDPR Privacy Statement in light of the enactment of the General Data Protection Regulation (“GDPR”), the new data protection and privacy regulation of the European Union (“EU”).
鑒於歐盟新頒布之個人資料保護規則(General Data Protection Regulation, 以下稱「GDPR」), 永豐金金融服務有限公司(以下稱「永豐金」或「本公司」)已發佈此GDPR私隱政策聲明。

This GDPR Privacy Statement is applicable to you if:
如您符合以下所述, GDPR私隱政策聲明將適用於您:

1. (for individual and joint account holders) you are living in any of the European Union member countries, Iceland, Liechtenstein or Norway;
(個人及聯名帳戶持有人適用) 您現正居於任何歐盟成員國家、冰島、列支敦士登或挪威境內; 或
2. (for all account holders) you have provided any personal data of a person living in any of the European Union member countries, Iceland, Liechtenstein or Norway to us.
(所有帳戶持有人適用) 您曾經提供任何現正居於任何歐盟成員國家、冰島、列支敦士登或挪威境內的人士的個人資料。

Based on your consent granted upon subscription of fund, SinoPac shall process your personal data for and on behalf of the fund in accordance with the terms and conditions of the fund administration agreement between the fund and SinoPac and the constitutive documents, including the offering documents of the fund (the “Constitutive Documents”) provided to you upon subscription for the purposes specified in the Constitutive Documents.
根據您於認購基金時給予的同意, 永豐金將按照永豐金與基金簽立的基金管理協議的條款及條件, 以及您於認購基金時收到的章程性質文件, 包括認購文件(「章程性質文件」), 以章程性質文件所述之目的而代表基金處理您的個人資料。

This GDPR Privacy Statement, supplementing the Constitutive Documents, sets out what personal data SinoPac collects from you for and on behalf the fund, what is the personal data used for and the safeguard SinoPac put in place, your rights on your personal data, to whom your personal data is transferred and how to lodge a complaint.

本GDPR私隱政策聲明補充章程性質文件, 載明本公司代表基金從您蒐集之個人資料、個人資料使用的目的及本公司現有的個人資料保障措施、您就您的個人資料的權利、您的個人資料會向誰提供、以及如何提出投訴。

What personal data the fund collect 基金蒐集之個人資料

SinoPac may collect for and on behalf of the fund some or all of following personal data from you whether you are in the EU or outside the EU, either by ways of automatic, semi-automatic or manual measures of collection of personal data from time to time:

本公司可能隨時代表基金蒐集下方列出的您的部分或全部個人資料, 不論您身處歐盟, 或非歐盟區, 亦或透過自動、半自動或手動的方式蒐集您的個人資料:

- 1) Name 姓名
- 2) Residential / Permanent address 住宅地址 / 戶籍地址
- 3) Identification document no. and/or passport no 身分證文件號碼 及/或 護照號碼
- 4) Contact numbers (including but not limited to home number, mobile number, work number and fax numbers) 聯絡電話 (包括但不限於住家電話、行動電話、公司電話及傳真號碼)
- 5) Date of birth 出生日期
- 6) Place of birth 出生地點
- 7) Email address 電郵地址
- 8) Information relevant to your occupation 與您的職業相關資訊
- 9) Gender 性別
- 10) Citizenship 國籍
- 11) Bank account details 銀行資訊
- 12) Financial information 財務資訊
- 13) Spouse and family information (if required) 配偶及家庭資訊(若有需要)
- 14) Background check information (if required) 背景審查(若有需要)
- 15) Any documents (or copies of such documents) verifying the abovesaid information provided by you (if required) 任何用以佐證上述資料的文件或其影本 (若有需要)

Additionally, your personal data may also be collected, generated or compiled by the Company for and on behalf of the fund in the course of continuing the contractual relationship between the fund and the Company.

除此之外, 本公司亦可能在基金與本公司的合約關係續存期間代表基金收集、制作或匯編您的個人資料。

Purposes of data collection 資料蒐集之用途

Except the abovementioned purposes, SinoPac may for and on behalf of the fund use your personal data for the purposes specified in the Constitutive Documents:
除以上所述之用途, 本公司將以章程性質文件所述之用途代表基金使用您的個人資料。

Your rights on your personal data 您就您的個人資料的權利

According to the GDPR, except the rights specified in the Constitutive Documents, you will have the following rights:

根據GDPR, 除章程性質文件所述之權利外, 您會有以下權利:

- The right of access - according to Article 15 of the GDPR. 查閱權 - 根據GDPR第15條。
- The right to rectification - according to Article 16 of the GDPR. 更正權 - 根據GDPR第16條。
- The right to erasure - according to Article 17 of the GDPR. 刪除權 - 根據GDPR第17條。
- The right to object - according to Article 21 of the GDPR. 拒絕權 - 根據GDPR第21條。
- The right to restrict processing - according to Article 18 of the GDPR. 限制處理權 - 根據GDPR第18條。
- The right to data portability - according to Article 20 of the GDPR. 資料可攜性權利 - 根據GDPR第20條。

On grounds relating to your particular situation, you shall have the right of objection to processing of your personal data for and on behalf of the fund by SinoPac at any time, in line with Article 6 paragraph 1 subparagraph e of the GDPR (data processing in the public interest) and Article 6 paragraph 1 subparagraph f of the GDPR (data processing based on balancing interests). This also applies to profiling based on this provision in terms of Article 4 paragraph 4 of the GDPR. Your objection may mean that SinoPac will no longer be able to provide services to you for and on behalf of the fund, which may in turn affect your interest in your

position of the fund.

您有權利根據您個人的特殊情況，在符合GDPR第6條第1項第e款(資料處理係為符合公共利益)及第6條第1項第f款(資料處理依據平衡利益)相關規定下，隨時拒絕本公司代表基金處理您個人資料。這亦適用於根據GDPR第4條第4項規定所執行的蒐集、利用、處理(profiling)。您的反對可能代表本公司不能再向您提供服務，亦可能因而影響您的基金持倉的利益。

You have the right to request access to and correction of personal data. If you believe any information we hold on you is incorrect or incomplete, SinoPac will strive to update or correct it as quickly as possible unless there is a valid reason for not doing so, at which point you will be notified. SinoPac will not store your personal data for longer than is necessary for the maintenance of your account or for the legal or regulatory requirements. SinoPac has strict retention period in place to meet these obligations.

您有權利要求查閱和更正個人資料。如您相信本公司持有的任何與您相關的資料有誤或並不完整，本公司將致力盡快將其更新或更正，除非本公司有任何有效的理由拒絕您的要求，並妥為通知您。您的個人資料儲存於本公司的時間不會長於維持您的帳戶或遵從法律或規則要求所需要的時間。為符合前述責任，本公司已制定嚴格的保留期限。

To whom your personal data is transferred 您的個人資料會向誰提供

According to the Constitutive Documents, the Company may provide your personal data to any of the persons specified therein whether in or outside Hong Kong. If you are located in the European Economic Area (“EEA”) your personal data may be transferred to countries located outside the EEA which do not provide a similar or adequate level of protection to that provided by countries in the EEA. Such transfers will only be made in accordance with applicable laws and regulations including where necessary for SinoPac to comply with SinoPac’s contractual obligations with you. The Company will take all steps reasonably necessary to ensure that any personal data are treated securely and in accordance with this GDPR Privacy Statement and the Constitutive Document.

根據章程性質文件，本公司可能代表基金向任何於該處述明的任何人士提供您的個人資料，不論其處於香港境內或境外。如您身處於歐洲經濟區，您的個人資料可能會提供予處於歐洲經濟區外的國家，此等國家可能未能提供與歐洲經濟區國家類似或充分水平的保障。本公司只會按照適用的法律及規則，包括當本公司有需要於履行本公司與您的合約義務時提供您的個人資料予該等國家。本公司將採取所有合理所需的步驟確保按照本GDPR私隱政策聲明及章程性質文件安全處理任何個人資料。

SinoPac will update this GDPR Privacy Statement as soon as possible in the event a modification is required in response to changes in the society or of any applicable laws or regulations, and will publicize the modified measure on the company website. This GDPR Privacy Statement was updated in July 2018.

此GDPR私隱政策聲明若因社會環境及相關法律與規則變遷而修改，本公司將儘速更新，並透過公司網頁公告。本GDPR私隱政策聲明於2018年7月修訂。

If there is any discrepancy between the English and Chinese versions, the English version shall prevail.

如中、英文版本有不同詮釋，概以英文版本為準。

If you have any questions, you can reach our Data Protection Officer (DPO) at:

若有任何問題，請聯繫本公司資料保護專員(DPO)：

SinoPac Solutions and Services Limited 永豐金融服務有限公司

Email: dpo.sss@sinopac.com

電郵: dpo.sss@sinopac.com