

## Policy under the Personal Data (Privacy) Ordinance

1. From time to time, it is necessary for individual clients to supply Yardley Securities Limited ("YARDLEY") with personal data in connection with the opening, maintenance and continuation of accounts, provision of financial services, products and administrative matters.
2. Failure to supply such personal data may result in YARDLEY being unable to open, maintain and continue the accounts or provide services and products to clients.
3. The purposes for which personal data relating to a client may be used are as follows:
  - i. the day to day operation and maintenance of accounts and financial services;
  - ii. conducting credit checks;
  - iii. monitoring continued credit checks and financial position of customer;
  - iv. designing financial services or related products for clients' use;
  - v. marketing financial services or related products to client;
  - vi. determining the amount of indebtedness owed to or by clients;
  - vii. collection of amounts outstanding from clients;
  - viii. complying with the requirements to make disclosure under any rules, regulations, guidelines, codes of conduct or courts order binding on YARDLEY;
  - ix. any other purpose relating to or in connection with the business or dealings of the YARDLEY Group; and
  - x. purposes relating to any of the above.
4. Personal data held by YARDLEY relating to a client will be kept confidential but YARDLEY may provide such personal data to:
  - i. any agent, contractor or third party service provider who provides administrative, telecommunications, computer, trade execution, payment or securities clearing or other services to YARDLEY in connection with the operation of its business;
  - ii. any other person under a duty of confidentiality to YARDLEY including a related company of YARDLEY which has undertaken to keep such information confidential;
  - iii. any banking or financial institution with which the client has or proposes to have dealings with;
  - iv. any group company of YARDLEY namely, any subsidiary or affiliate of YARDLEY Group or non-group company for marketing purposes;
  - v. any actual or proposed assignee of YARDLEY or participant or sub-participant or transferee of YARDLEY rights in respect of the client; and
  - vi. any person to whom YARDLEY is under an obligation to disclose under any law, rules, regulations, directions, guidelines applicable to YARDLEY .
5. There may be situations where clients elect to provide personal data to YARDLEY through electronic means such as Internet or voice recording system. Whilst YARDLEY generally uses its best endeavors to maintain the security and integrity of its systems, due to unforeseen circumstances or other reasons, electronic communication may not be the most reliable medium of communication. In this regard, clients should exercise caution of such weaknesses and communicate personal data through electronic devices with care.

6. Clients of YARDLEY may have the right to :
  - i. check whether YARDLEY holds personal data about him and the right of access to such personal data;
  - ii. to require YARDLEY to correct any personal data relating to him which is inaccurate;
  - iii. to request YARDLEY to cease using your personal data for direct marketing purposes; and
  - iv. to ascertain YARDLEY policies and practices in relation to data and to be informed of the kind of personal data held by YARDLEY .

YARDLEY may charge a reasonable fee for processing such data access request.

7. The person to whom requests for access to data or correction of data or for information regarding policies and practices and kinds of data held are to be addressed as follows:

The Data Protection Compliance Officer  
20/F., V-Heun Building  
138 Queen's Road Central  
Hong Kong.