

Personal Data (Privacy) Ordinance

Mighty Brokerage (Asia) Limited (herein after referred to as “Mighty” or “the company”) in the personal data (Privacy) Ordinance under responsibility and policy.

- 1 From time to time, it is necessary for customers to supply the Company with the update information in connection with the opening or continuation of accounts and the establishment or continuation of credit facilities or provision of financial and/or other services.
- 2 Failure to supply such information may result in the Company being unable to open or continue accounts or establish or continue credit facilities or provide financial or other services.
- 3 Data maybe collected from customers in the ordinary course of the continuation of the business relationship between customers and the Company.
- 4 Providing personal information to the Company through electronic channels such as e-mail, Internet or voice recording system cannot be guaranteed to be completely secure. The Company will not be responsible for any damage suffered by users if they send any information to the Company through electronic devices, or if the Company sends any information through electronic devices at the request of the user. Customers should take heed of such weaknesses and communicate personal information through electronic devices with caution.
- 5 To facilitate the trading of securities to provide customers with quality and relevant services, the Company will request or require customers to provide personal data in the future, the personal information collected in conjunction for the following purposes:
 - ◆Identification of customer;
 - ◆The daily operation of the services and credit facilities provided to customers. Regardless of whether such services by/or through any member company of the company or provided by any other person;
 - ◆Implementation of instructions of the customer or other services;
 - ◆Customers with credit and risk assessments, financial situation and investment objectives. Assisting other institutions or any other person to conduct credit checks of customers, aims to ensuring ongoing credit worthiness of customers;
 - ◆Determining the amount of indebtedness owed to or by customers and to facilitate any member company of the company carry out mortgage, charge or other right and interest;
 - ◆Designing and marketing financial services or related products for customers through any member company of the company or any business partners;
 - ◆Forming part of the records of the person or member of the Company to whom the data may be passed;
 - ◆Purposes relating to any of the above.

6 Use of Data in Direct Marketing:

The Company intends to use and/or transfer the Customer's data to any related companies of the Company for direct marketing and the Company requires the consent (which includes an indication of no objection) of the Customer for that purpose. In this connection, please note that:

- ◆ your name, contact details, products and services portfolio information, transaction pattern and behavior, financial background and demographic data held by the Company from time to time may be used by the Company in direct marketing;
- ◆ the following classes of services, products and subjects may be marketed:
 - (i) securities, commodities, investment and related services and products;
 - (ii) reward, loyalty or privileges programmes in relation to the class of marketing subjects as referred to in (i) above; and
 - (iii) donations and contributions for charitable and/or non-profit making purposes.

If a Customer does not wish the Company to use and/or transfer the Customer's data for use in direct marketing, the Customer may, without charge, exercise the right to opt-out.

7 Data held by the Company relating to a customer will be kept confidential and compliance with the provisions of the Personal data (Privacy) Ordinance. But the Company may provide, transmit, disclose or exchange such information to the following parties (whether within or outside Hong Kong):

- ◆ Any member company of the Company, agent, contractor, other person to whom data is passed or third party service provider who provides administrative, data processing, computer, telecommunications, payment or securities clearing, financial, professional, or other services to the Company in connection with the operation of its business;
- ◆ Any other person under a duty of confidentiality to the Company including any member company of the Company which has undertaken to keep such information confidential;
- ◆ Any nominee in whose name securities or other property may be registered;
- ◆ Any person with the Company enters into or proposes to enter into transaction on your behalf, or persons representing the same;
- ◆ Any assignee, transferee, participant, sub-participant, delegate, successor or person to whom your account is transferred;
- ◆ Any credit reference agency and in the event of default, any debt collection agency;
- ◆ Governmental, regulatory or other bodies or institutions, whether as required by law, regulations applicable to any member company of the Company.

8 Under and in accordance with the terms of the Personal Data (Privacy) Ordinance, an individual has the right to:

- ◆ Verify whether the company holds the customer's personal data
- ◆ Access and correct the Company holds the customer's any data
- ◆ Ascertain the Company's policies and practices in relation to data and to be informed of the kind of personal data held by the Company.
- ◆ Aware of the Company holds the kinds of personal data
- ◆ Aware of the company holds the personal data or intended main use

- 9 This Policy may be revised, amended or supplemented from time to time by the Company. Customer can request for a copy of such information or request changes to such data. In accordance with the terms of the Personal Data (Privacy) Ordinance, the Company reserves the right to charge a reasonable fee for the processing of any data access request.
- 10 In addition to the Company's duty of confidentiality to customers, the Company shall at all times observe the above privacy principles and the Ordinance in collecting, maintaining and using the personal data of customers.
- 11 The customer 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 is as follows:

Mighty Brokerage (Asia) Limited

Shop 68-70, Manor Centre,

218 Fuk Wing Street,

Kowloon

- 12 If there is any inconsistency between the English and Chinese version, the English version shall prevail.