



**Personal Information Collection
Statement**

個人資料收集聲明

Protecting the privacy and safeguarding the personal information of our existing customers, former customers and persons who visit our website is one of our highest priorities. The following statement explains how ADS Securities Hong Kong Limited (“ADS HK”) or any of ADS HK’s affiliates (collectively referred to as “ADSS Group”, “us”, “we” or “our”) collects, maintains and protects your personal information.

保護和維護我們現有客戶、從前的客戶和所有瀏覽我們網頁的客戶是我們最優先的。以下的聲明闡釋阿布扎比證券香港有限公司(“ADS 香港”)或其附屬公司(統稱“ADSS 集團”、“我們”、“本公司”)如何收集、保存和保護閣下的個人資料。

By your use of any website operated by ADS HK or any of its affiliates or opening an Account with ADS HK, you give your consent to the collection and use of personal information by all members of the ADSS Group on an ongoing basis as explained in this statement.

當閣下使用任何 ADS 香港經營凡或其附屬公司的任何網站或與 ADS 香港開設賬戶，即閣下授權 ADSS 集團所有成員持續收集及使用閣下的個人資料。

This statement also briefly describes our privacy policies and procedures.

此聲明簡略介紹了我們的私隱政策和程序。

COLLECTION AND RETENTION OF YOUR PERSONAL INFORMATION

收集和保存閣下的個人資料

We collect your personal information both directly from you and indirectly as a result of your relationship with us from time to time.

我們會根據我們之間不時之關係直接及間接收集閣下的個人資料。

PURPOSES OF COLLECTION

收集目的

We may use the information collected to verify your identity, open a trading account for you (including issuing you with an Account number and password), service your account including providing statements and trade confirmations, facilitate Account funding and withdrawals, including in connection with margin trading, conduct credit checks at account opening and regularly thereafter, collect outstanding amounts from you whether through the use of cheques or bank transfers, collect personal information from those who provide security or guarantee your performance in connection with your account, carry out statistical and other analysis, and for any other purposes directly related to any of the above purposes (“Business Purposes”). If you do not provide us with your personal information for these Business Purposes, we may not be able to open an account or to provide any services to you.

我們可能會使用收集的資料來核對閣下的身份，為閣下開設交易賬戶(包括發出閣下的賬戶號碼及密碼)、賬戶服務包括提供結單、交易確認、存入和提取資金，包括以保證金交易、開戶和其後的信貸調查、以支票或銀行轉賬收取閣下的欠款、由那些為閣下的賬戶提供安全和保證的公司收集閣下的個人資料，進行統計和其他分析，以及用於任何直接與上述提

及有關的目的(“業務目的”)。如閣下不提供個人資料以用於上述業務目的，我們可能不能為閣下開設賬戶或提供服務。

PERSONAL INFORMATION TO BE COLLECTED

個人資料收集

Most of the personal information we collect is provided directly by you, for example by you filling in an application form. This information includes, but is not limited to, personal details, such as your name, address, date of birth, telephone number and e-mail address, information required pursuant to regulatory requirements verifying your identity such as a passport or other government issued photo identification, financial information such as your Account trading details, annual income, net worth, risk capital financial information, bank account details and credit card information.

大部分我們所收集的個人資料是由閣下直接提供，例如閣下在申請表格上所填的資料。這些資料包括但不限於，個人資料，例如閣下的姓名、地址、出生日期、電話號碼和電子郵件地址、根據監管要求核實閣下的身份的資料，例如護照或其他政府發出的有照片身份證明文件、財務資料，如閣下的賬戶交易資料、年收入、淨資產、風險資本、銀行賬戶資料和信用卡資料。

Other information, such as your IP address, web browser type, operating system and your internet service provider, will be provided by you indirectly in the ordinary course of our business relationship with you, for example through online tracking, as described in the section below entitled “Cookies”. 其他資料如閣下的 IP 地址、網頁瀏覽器、操作系統和閣下的互聯網供應商，將在閣下與本公司正常的業務關係下由閣下間接提供，例如在下題為“Cookies”所描述的網上追蹤。

COOKIES

COOKIES

We use cookies and other technologies (collectively, “cookies”) on our website to store and track information about you and your actions for the purposes of providing us with data we can use to improve your experience and to know you better. Cookies are small text files sent from various web servers that may be stored on your computer. Cookies enable us to capture how you arrived at our website, how often you visit, when you return, which pages on our website you visit, and to recognize when you are logged on when we receive a request from your web browser. We may link the information we store in cookies in order to identify information you submit while on our website. Cookies are readable only by us and do not on a standalone basis contain any personal, financial or Account information. We cannot and will not gather information about other websites you have visited in the past.

我們在網站中使用 Cookies 和其他技術(統稱“Cookies”)儲存及追蹤有關閣下和閣下的行動為我們提供數據，以致我們能提高閣下的經驗及更了解閣下。Cookies 是由不同的網頁伺服器提供的小型文字檔並可能會存儲在閣下的電腦上。Cookies 能幫助我們存取閣下如何到達我們的網頁、閣下瀏覽的次數、當閣下返回時、閣下瀏覽過的頁面和當閣下登入時，我們能辨識閣下。我們可以透過在 Cookies 儲存的資料以確認閣下在我們網頁所提交的資料。Cookies 只供我們閱讀，並不載有任何個人、財務或賬戶資料。我們不能亦不會從閣下到過的其他網站收集資料。

We may share usage information about persons who visit our website with reputable advertising companies for the purpose of targeting our banner advertisements on the internet. The information collected by the advertising company through the use of these pixel tags does not identify you personally.

我們可能會分享曾瀏覽我們網站的用戶的使用資料給有信譽的廣告商，用以在網上登廣告之用。廣告商透過像素標籤收集的資料並不能識別閣下的身份。

Additionally, we may use third party software to track and analyze usage and volume information including page requests, form requests and click paths. The third party may use cookies to track your web browsing behavior and may implement cookies on behalf of us. Your personal information will not be used by that third party or be further transferred by that third party to any other person.

此外，我們可能使用第三方提供的軟件來追蹤和分析使用情況及數量資料，包括頁面請求、表格請求和點擊路徑。第三方可能使用 Cookies 追蹤閣下的網頁瀏覽行為或代替我們實施 Cookies。閣下的個人資料並不會被第三方使用或由第三方轉發給他人。

All web browsers have settings that allow you to block cookies. By visiting our website with your web browser set to allow cookies, you consent to our use of cookies as described above. If you choose to block cookies you may use our services, however, some functions and features may be disabled or may not work as they were initially designed to.

所有網頁瀏覽器有允許閣下禁止使用 Cookies 的設置。當閣下瀏覽我們的網站時，且閣下的網頁瀏覽器允許使用 Cookies，即閣下同意我們使用上述的 Cookies。如閣下禁止 Cookie，閣下仍可使用我們的服務，但一些功能可能被禁用或無法正常運作。

DISCLOSURE WITHIN ADSS GROUP AND TO NON-AFFILIATED THIRD PARTIES FOR BUSINESS PURPOSES **ADSS 集團及非其附屬公司的第三方商業用途之披露**

We may share your personal, financial and Account information with our affiliates for any of the Business Purposes, as permitted by applicable law including to countries outside of Hong Kong where there may not be comparable data protection laws. Our affiliates are companies which are controlled or directly or indirectly owned by members of the ADSS Group; and include financial service companies, such as dealers and other brokerage firms.

在任何商業用途的情況下，我們可以分享閣下的個人、財務和賬戶資料給我們的附屬公司，這是法律允許並包括香港以外沒有資料保護法的國家。我們的附屬公司為 ADSS 集團操控或直接或間接擁有的公司，包括金融服務公司，如經銷商和其他經紀商。

To help us improve our services to you for the Business Purposes, we may engage another business to help us carry out certain internal functions, such as account or data processing, fulfillment, client service, client satisfaction surveys as well as vendors that prepare and mail statements and transaction confirmations or provide data processing, computer software maintenance and development, transaction processing, credit references, debt collection companies or to any other businesses directly relevant to the Business Purposes.

為了幫助改進我們的服務，我們可從事其他業務，以幫助我們進行一些內部功能，如賬戶或資料處理、履行、客戶服務，客

戶滿意度調查，以及該供應商提供的和郵寄結單和交易確認書或提供資料處理，電腦軟件維修和發展、交易處理、信貸證明、討債公司或其他直接與我們有商業用途的業務。

We may also transfer your personal information to Service Providers in connection with the Business Purposes.

我們也可轉送閣下的個人資料給與我們有商業用途的服務提供商。

We may disclose your personal information to non-affiliated entities, governments or regulatory authorities as permitted or required by applicable law including disclosing your personal information to regulatory bodies for anti-money laundering and counter-terrorist financing purposes. For example, we may disclose personal information to cooperate with regulatory authorities and law enforcement agencies to comply with subpoenas or other official requests, and as necessary to protect our rights or property.

我們受法律包括打擊清洗錢及反恐融資的目的許可或要求向非附屬組織、政府或監管機構披露閣下的個人資料。例如，我們可能披露閣下的個人資料與監管機構和執法機構進行合作，以滿足傳票或官方的要求，並保護我們的權利或財產。

DIRECT MARKETING BY ADSS GROUP MEMBERS **ADSS 集團成員之直銷**

We may also use your name, telephone number, home address and e-mail address ("Personal Data") to notify you of any new and existing financial services related products, services and promotions that may be of interest to you ("Direct Marketing"). We may also use your name, telephone number, home address and e-mail address ("Personal Data") to notify you of any new and existing financial services related products, services and promotions that may be of interest to you ("Direct Marketing"). We may also use your name, telephone number, home address and e-mail address ("Personal Data") to notify you of any new and existing financial services related products, services and promotions that may be of interest to you ("Direct Marketing").

We may also use online tracking information for Direct Marketing. We will not use any personal information collected via online tracking information for Direct Marketing.

我們也可能使用閣下的姓名、電話號碼、住宅住址和電子郵件地址（“個人資料”），通知閣下任何有關最新或現有的金融服務產品、服務及閣下可能有興趣的宣傳（“直接促銷”）。

Your provision of Personal Data for Direct Marketing is voluntary and so if you do not wish us to use your Personal Data for Direct Marketing purposes, you can opt out by contacting us through the contact information set out under the section entitled "Contact us" below.

閣下是自願提供用於直接促銷的個人資料，如果閣下不希望我們使用閣下的個人資料作直接促銷用途，閣下可以通過下題“聯絡我們”的聯絡資料與我們聯絡，並選擇退出。

Should you close your Account with us, we will retain your personal information, but we will only use it to comply with our regulatory requirements and will only keep such information for a period which is not longer than necessary and permitted by the relevant local laws. We will also periodically contact you to notify you of new products, services and promotions we may offer from time to time but you can opt out if you wish.

如閣下結束閣下的賬戶，我們會保留閣下的個人資料，但只用來符合我們的監管要求，亦只保留這些資料至一段時間，並不會超過法律允許或必要的時間。我們也可能定期與閣下聯絡、通知我們不時提供的最新產品、服務和宣傳，閣下可以選擇退出，如閣下有此意願。

DISCLOSURE TO NON-AFFILIATED THIRD PARTIES FOR DIRECT MARKETING

有關向第三方直接促銷之披露

We will not sell, license, lease or otherwise disclose your personal information to any third party for any reasons, except as described below.

我們不會向任何第三方以任何理由出售、許可、出租或以其他方式披露閣下的個人資料，除非如下文所述。

We may provide a non-affiliated third party with your Personal Data, to help us analyze and identify client needs, notify clients of product and service offerings or conduct general marketing and market research for us in connection with our financial services products and services only.

我們可能向非附屬的第三方提供閣下的個人資料，以幫助我們分析和辨認客戶身份，通知客戶我們提供的產品和服務或進行一般與我們的金融產品有關的宣傳和市場研究。

In order to promote the products and services we provide to you, we may also share your personal and account information with third-party service providers and joint marketers not affiliated with us [for gain], namely financial service institutions with whom we have joint marketing agreements, such as agreements to market financial services or products that we jointly offer, endorse or sponsor; and companies under contract to perform services for us or on our behalf, including direct marketing services.

為了促銷我們為閣下提供的產品和服務，我們也可能會與第三方的服務提供商或非附屬的聯合促銷商[增益]，即與我們有共同營銷協議的金融服務機構，如我們共同向市場推出、支持或贊助的金融服務和產品的協議，分享閣下的個人和賬戶資料。這些公司會根據合同代表我們提供服務，包括直接促銷服務。

We generally require that all non-affiliated third parties to which we provide your nonpublic information agree to keep your information confidential and use such information solely for the limited purpose for which we have engaged them, or as otherwise required by law. We also seek to ensure that these non-affiliated third parties maintain appropriate data security procedures to guard against unauthorized use of, or access to, your information.

我們一般要求所有由我們提供閣下非公開資料的非我們附屬的第三方，同意將閣下的資料保密，並只使用這些資料作有限度的用途且與我們有關或法律要求。我們也致力確保這些非我們附屬的第三方維持適當的資料保護程序，以防止閣下的資料遭未經授權的使用或存取。

We may also transfer online tracking information for Direct Marketing to the above described third parties for gain.

我們也可能轉發網上追蹤資料作直接促銷用途給上述第三方作增益之用。

We will not transfer any online tracking information for Direct Marketing to any third parties other than the above described.

我們不會轉發任何網上追蹤資料作直接促銷用途給上述以外的第三方。

We will not however transfer any of your Personal Data to any of the above described third parties for Direct Marketing purposes without your prior written consent. Your provision of your personal information for Direct Marketing is voluntary and you can

opt out by contacting us through our contact details under the section entitled "Contact us".

然而，事先未經閣下的書面同意下，我們不會傳送閣下的任何個人資料給任何上述第三方作直接促銷用途的。閣下是自願提供個人資料作直接促銷之用途，閣下可以通過下述“聯絡我們”的聯絡資料與我們聯絡，選擇退出。

SECURITY AND RETENTION OF YOUR PERSONAL INFORMATION 閣下的個人資料保障及保存期

We are committed to protecting the privacy, confidentiality and security of the personal information we hold by complying with the local applicable legal requirements including the Personal Data (Privacy) Ordinance in Hong Kong with respect to managing your personal information. We are equally committed to ensuring that all our employees and agents uphold these obligations.

我們實行與本地適用的法律包括香港個人資料（私隱）條例並致力保護閣下的個人資料的隱私性、保密性和安全性。我們同樣致力確保我們所有的員工和代理人堅守這些義務。

We employ physical, electronic, and procedural safeguards in order to protect your personal, financial and Account information and to offer you a safe and secure trading environment. When you open an Account with us, you are issued a unique Account number and password, as well as a unique user id and password for the Secure Access Website.

我們採用真實、電子和程序化保障，以保護閣下的個人、財務和賬戶資料，並為閣下提供安全可靠的交易環境。當閣下與我們開設賬戶，閣下會收到一個獨一無二的賬戶號碼和密碼，以及獨一無二的安全瀏覽網站使用者名稱和密碼。

- Our employees are required to maintain and protect the confidentiality of your personal information and must follow established procedures to do so.

我們的員工必須維護和保護閣下的個人資料的保密，並必須遵循已定立的程序來執行。

- We limit access to your personal, financial and Account information to those employees and employees of our affiliates who need to know in order to conduct business, including servicing your Account. These employees will have access to your Account number and user id. Although certain employees have the ability to reset your Account password and Secure Access Website password for you, they will not have access to your password, as they are not saved in our systems.

我們限制有業務需的員工和我們附屬公司的員工有取得閣下的個人、財務和賬戶資料，包括閣下賬戶的服務，員工和我們附屬公司的員工將有機會取得閣下的賬戶號碼和使用者名稱。雖然一些員工有重設閣下的賬戶密碼和安全瀏覽網站的密碼，但他們無法取得閣下的密碼，因為密碼不會儲存在我們系統中。

- We have employed adequate security measures based on recognized international standards, to safeguard your personal information and protect from it from being disclosed, compromised or leaked.

我們採用公認的國際標準的安全措施，以保障閣下的個人資料免受披露或洩露。

- Your personal, financial, and Account information, including your credit card details (where applicable), will be disposed of or purged from our records based on our data retention

policy seven years after the Account has been closed, which is compliance with recognized international standards.

閣下的個人、財務和賬戶資料，包括閣下的信用卡資料(如適用)，將根據我們的資料保存政策在賬戶取消後的七年被銷毀或從我們的記錄中清除，這是符合國際認可標準。

- We use VeriSign certificates to encrypt the information contained on our Secure Access Website, System and Website, including the webpages used for credit card funding and online account application.

我們使用威瑞信保證對我們的網頁安全造訪、系統和網站作加密，包括曾使用信用卡和網上賬戶申請的網頁。

You are ultimately and solely responsible for maintaining the secrecy of your Account number and password and the Secure Access Website user id and password. In order to better safeguard this information, we highly recommend you the following precautions:

閣下是最終並獨自負責維持閣下的賬戶號碼和密碼及安全瀏覽網站的使用者名稱和密碼的保密性。為了更好地維護這些資料，我們強烈建議以下的預防措施：

- Do not disclose your Account number and password, or Secure Access Website user id and password to anyone; 不要向他人披露閣下的賬戶號碼和密碼或安全瀏覽網站的使用者名稱和密碼；
- Do not save your Account number and password, or Secure Access Website user id and password on any shared, public or private computer, tablet, mobile phone, or any other device; 不要把閣下的賬戶閣下的賬戶號碼和密碼或安全瀏覽網站網頁的使用者名稱和密碼儲存在任何共用、公共或私人電腦、平板電腦、手提電話或任何設備；
- Avoid using public computers at internet cafes and similar places whenever possible; 避免使用網吧或類似場所的公共電腦；
- Immediately change your Account password and Secure Access Website password after your first log-in; 在第一次登入後，立刻更改閣下的賬戶和安全瀏覽網站密碼；
- Change your Account password and Secure Access Website password regularly and whenever you believe there may have been a breach or when you believe a breach may occur in the future; 定期或當閣下認為已經或將會出現缺口時更改閣下的賬戶和安全瀏覽網站密碼；
- Choose strong passwords that are not easily breakable, include capitalized letters, numerical values and symbols and differ from other passwords you are using for other accounts; 選擇不易被破解的強密碼，包括中寫字母、數值和符號，並且與閣下其他的密碼不同；
- Do not configure the save password option on the web browser you are using; 不要選擇使用瀏覽器的密碼儲存功能；
- The computer, tablet, mobile phone, or other device you are using has security controls, such as, antivirus software; 閣下使用的電腦、平板電腦、手提電話或其他設備具有安全控制如防毒軟件；
- Ensure that the Website you are accessing is legitimate ADS HK Website; 確保閣下瀏覽的網頁是合法的 ADS 香港網站；

- Make sure that the Website is changed to “https” prior to entering any information, such as, personal information, log-ins, passwords and credit card information to ensure information is encrypted during transmission; 在輸入任何資料如個人資料、登入資料、密碼和信用卡前，確保網址更改為以”https”開頭，以確保資料在傳送過程中已加密；
- Do not continue the transmission, if the SSL Certificate of the Website you are accessing does not belong to ADS HK and immediately notify ADS HK; 如閣下造訪的網站的 SSL 保證不屬於 ADS 香港，請不要繼續傳送，並立刻通知 ADS 香港；
- Validate all calls, emails or other communications from ADS HK are genuine prior to disclosing any personal, financial or Account information; and 在透露任何個人、財務或賬戶資料前，驗證所有由 ADS 香港發出的電話、電郵或其他通訊；及
- Notify ADS HK immediately if you believe your Account or Secure Access Website access has been compromised. 如果閣下認為閣下的賬戶或安全瀏覽網站的存取資料被洩露，請立刻通知 ADS 香港。

ACCESS RIGHTS

訪問權限

You have the right to request access to and correction of any of your personal data held by us. For data access requests, we may charge a reasonable fee. You can contact us if you would like to make such a request or have any queries as to how we handle such request, using the contact details set out under the section entitled “Contact us” below.

閣下有權要求查閱及更正任何我們持有閣下的個人資料。對於資料存取，我們可能會收取合理費用。如果閣下有這樣的要求或有任何關於我們如何處理該要求的疑問，閣下可以通過下題“聯絡我們”的聯絡資料與我們聯絡。

OPT- OUT

退出

If you do not agree to allow us to use or transfer your personal information for Direct Marketing purposes, you can opt out by contacting us using the contact details below the section entitled “Contact us”.

如果閣下不同意讓我們使用或轉發閣下的個人資料作直接促銷用途，閣下可以通過使用下題“聯絡我們”的聯絡方式與我們聯絡，選擇退出。

CONTACT US

聯絡我們

In connection with your access rights or Direct Marketing opt-out rights as well as any queries about our privacy policy and procedures, you may notify our Data Protection Officer in writing via email at cs@ads-securities.com.hk or at Rooms 801-804, and 810, 8th Floor, Alexandra House, 18 Chater Road, Central, Hong Kong or contact your Account Manager. For joint accounts, an-opt out election made by one account owner will be applicable to all owners on the Account. Please allow approximately 30 days from our receipt of your request for your instructions to become effective.

有關閣下的訪問權限或選擇退出直接促銷的權行，以及我們的隱私政策及程序，閣下可透過 cs@ads-securities.com.hk 或郵寄致香港中環遮打道 18 號歷山大廈 8 樓 801-804,810 室與我們的資料保護主任或閣下的賬戶經理聯絡。任何一位聯名賬戶的持有人選擇退出，即等同所有賬戶持有人也選擇退出。閣下的要求會在收到閣下的指示後大約 30 天內生效。

CHANGES TO THIS PRIVACY STATEMENT

更改本私隱聲明

In the event any material changes are made to this statement, the revised statement will be posted on our website as soon as reasonably practical. By your continued use of the website and/or by opening an Account with us, you hereby agree to accept this as notice provided to you.

如本聲明有任何主要的更改，會盡快在合理的情況下在我們的網站公佈。如閣下繼續使用本公司網站或與我們開設賬戶，即閣下同意最新的聲明。

Any dispute over this statement is subject to the terms of this statement and our Terms. If you have any questions that this statement does not address, please contact our Data Protection Officer or a support representative.

任何爭議將受制於本聲明和協議中的條款。如閣下有任何對本聲明沒有提及的有疑問，請聯絡我們的資料保護主任或代表。

* Should there be any inconsistencies between the English and the Chinese version of this Statement, the English version shall prevail.

* 如本聲明的英文版與中文版有歧義，應以英本版本為準。