

## VISTRA HONG KONG PRIVACY NOTICE 瑞致達香港私隱聲明

**Effective Date:** from 19 April 2022  
生效日期：2022 年 4 月 19 日起

This Privacy Notice explains how particular Hong Kong companies in the Vistra Group collect, use and disclose your personal data, and your rights in relation to the personal data it holds.  
本私隱聲明解釋說明了瑞致達集團旗下的特定香港公司如何收集、使用和披露閣下的個人資料，以及閣下對其持有的個人資料享有的權利。

This Privacy Notice supersedes any previous Privacy Notice or equivalent which you may have been provided with or seen prior to the Effective Date stated above.  
本私隱聲明取代在上述生效日期之前閣下可能已經收到或看到的任何先前的私隱聲明或同等文件。

### **Vistra Corporate Services (HK) Limited, Vistra (Hong Kong) Limited, Vistra Incorporations (Hong Kong) Limited, Vistra Trust (Hong Kong) Limited and Vistra Alternative Investment Services (Hong Kong) Limited**

Vistra Corporate Services (HK) Limited, Vistra (Hong Kong) Limited, Vistra Incorporations (Hong Kong) Limited, Vistra Trust (Hong Kong) Limited or Vistra Alternative Investment Services (Hong Kong) Limited (in this Privacy Notice, “Vistra”, “us”, “we” and “our”) may be acting as the respective Data User of your personal data and, as part of the Vistra Group (meaning Vistra Group Holdings (BVI) III Limited, any of its current and future affiliated entities, or such other amalgamated or re-organised successor company of Vistra Group Holdings (BVI) III Limited), recognises our responsibilities in relation to the collection, holding, processing, use and/or transfer of personal data under the Personal Data (Privacy) Ordinance (Cap. 486) (“PDPO”).  
Vistra Corporate Services (HK) Limited、Vistra (Hong Kong) Limited、Vistra Incorporations (Hong Kong) Limited、Vistra Trust (Hong Kong) Limited 或 Vistra Alternative Investment Services (Hong Kong) Limited (在本私隱聲明中統稱「瑞致達」，「我們」、「我司」和「我們的」) 可能作為閣下個人資料的資料用戶，並且作為瑞致達集團 (指 Vistra Group Holdings (BVI) III Limited、其當前和未來的任何關聯實體或其他合并或重組的繼受公司) 的一部分，承認我們在根據《個人資料 (私隱) 條例》(第 486 章) 收集、持有、處理、使用及/或傳輸個人資料方面的責任 (「私隱條例」)。

Personal data will be collected by us only for lawful purposes and all practicable steps will be taken to ensure that personal data held by us is accurate. We shall moreover use all practicable steps to protect any personal data we hold against unauthorised or accidental access, processing, erasure, loss or use. If we engage a data processor to process any personal data held by us, we shall adopt contractual or other means to ensure that the data processor complies with the mentioned data security requirement. We shall only use personal data for the purposes for which your personal data was originally collected and as further detailed herein.

我們只會出於合法目的收集個人資料，並會採取一切可行措施確保我們持有的個人資料準確無誤。此外，我們還將採取一切可行的措施預防我們持有的任何個人資料出現以下情況：遭到未經授權或意外訪問、處理、刪除、丟失或使用。如果我們聘請數據處理商處理我們持有的任何個人資料，我們將通過簽訂合同或其他方式確保數據處理商符合上述資料安全要求。我們只會將個人資料用於最初收集閣下的個人資料的目的以及本私隱聲明進一步詳述的目的。

We will use your personal data only in accordance with this Privacy Notice. Vistra may update this Privacy Notice from time to time. We advise you to periodically review this Privacy Notice to be informed of how Vistra is protecting your privacy.

我們僅根據本私隱聲明的規定使用閣下的個人資料。瑞致達可能不時更新本私隱聲明。我們建議閣下定期查看本私隱聲明，以了解瑞致達如何保護閣下的私隱。

This Privacy Notice outlines Vistra’s practices and the choices you have concerning the collection

and use of your personal data. This Privacy Notice should be read together with the applicable terms and conditions, terms of engagement, or service agreements of the relevant service or website provided by Vistra (the “**Terms and Conditions**”), provided that, in the event of any inconsistency between this Privacy Notice and the Terms and Conditions concerning matters relating to personal data, the Terms and Conditions shall prevail.

本私隱聲明概述了瑞致達在收集和使用閣下的個人資料方面的做法以及閣下的選擇。在閱讀本私隱聲明時，應參考瑞致達提供的相關服務或網站的適用條款和條件、委託條款或服務協議（「**條款和條件**」），但是，如果本私隱聲明與條款和條件之間在有關個人資料的事項方面存在任何不一致之處，以條款和條件為準。

## **Queries and Contact Details**

### **查詢和聯繫方式**

All data access requests shall be made using the form prescribed by the Privacy Commissioner for Personal Data (“**Privacy Commissioner**”) which may be found on the official website of the Office of the Privacy Commissioner or via this link:

<https://www.pcpd.org.hk/english/publications/files/Dforme.pdf>.

所有資料訪問請求均應以個人資料私隱專員（「**私隱專員**」）規定的格式提出，並可在私隱專員公署的官方網站或通過以下連結查找：<https://www.pcpd.org.hk/english/publications/files/Dforme.pdf>.

Requests for access, correction, complaints, or other queries relating to how your personal data is processed should be addressed to us via the contact details specified below:

如需了解如何處理閣下的個人資料的訪問、糾正、投訴或其他查詢請求，請通過下文列出的聯繫方式向我們提出：

Mail - 19th Floor, 33 Hysan Avenue, Causeway Bay, Hong Kong, FAO General Counsel

通信地址：香港銅鑼灣希慎道 33 號 19 樓

FAO 總法律顧問

Email - [Privacy@vistra.com](mailto:Privacy@vistra.com)

電子郵箱：[Privacy@vistra.com](mailto:Privacy@vistra.com)

Telephone - +852 2848 9198 or +852 2521 3661

電話：+852 2848 9198 或 +852 2521 3661

To the extent permitted by the PDPO and applicable laws and regulations, we reserve the right to refuse unreasonable requests (for example, requests which infringe the privacy of others). To the extent permitted by the PDPO and applicable laws and regulations, we reserve the right to charge a reasonable fee for the cost of processing any request.

在私隱條例和適用法律法規允許的範圍內，我們保留拒絕不合理請求（例如：侵犯他人私隱的請求）的權利。在私隱條例和適用法律法規允許的範圍內，我們保留就處理任何請求的成本收取合理費用的權利。

## **Termination or cancellation**

### **終止或取消**

Should your account or relationship with us be cancelled or terminated at any time, we shall cease processing your personal data as soon as reasonably practicable following such cancellation or termination, provided that we may keep copies of your data as is reasonably required for archival purposes, for use in relation to any actual or potential dispute, for the purpose of compliance with applicable laws and regulations or for the purpose of enforcing any agreement we have with you, for protecting our rights, property or safety, or the rights, property or safety of our employees, and for performing or discharging any functions, obligations and responsibilities we may have.

如果閣下的賬戶或與我們的關係在任何時候取消或終止，我們將在該等取消或終止後，在合理可行的

情況下盡快停止處理閣下的個人資料，但是我們可以出於以下目的，在存檔合理所需的時間內保留閣下的資料副本：用於與任何實際或潛在的爭議有關的用途，為確保遵守適用的法律法規或強制執行我們與閣下達成的任何協議，為保護我們的權利、財產或安全，或我司員工權利、財產或安全，以及為了履行我們可能承擔的任何職能、義務和責任。

## General

### 總則

If there is any inconsistency or conflict between the English and Chinese versions of this Privacy Notice, the English version shall prevail.

凡本私隱聲明中英文版本有任何不一致或沖突，概以英文版本為準。

## Data Request and Access Rights to Personal Data

### 資料請求和個人資料的訪問權

Under the PDPO, you may have the right to:

根據私隱條例，閣下可能有權：

- verify whether Vistra holds any personal data about you and to access any such data;
- 核實瑞致達是否持有有關閣下的任何個人資料並訪問任何該等資料；
- require Vistra to correct any personal data relating to you which is inaccurate;
- 要求瑞致達糾正與閣下有關的任何不準確的個人資料；
- withdraw your consent for use or provision of personal data for direct marketing;
- 撤回閣下對出於直接營銷目的使用或提供個人資料的同意；
- make a complaint about Vistra's data handling; and
- 對瑞致達的資料處理方式提出投訴；及
- enquire about Vistra's policies and practices in relation to personal data.
- 詢問瑞致達與個人資料有關的政策和做法。

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply in accordance with the PDPO and applicable laws.

請注意，上述權利不是絕對的，如果私隱條例和適用法律允許破例，我們有權拒絕請求。

If you are located in Hong Kong, you can also find out more about your rights at [www.pcpd.org.hk](http://www.pcpd.org.hk). If you are located in Europe, to find out more about your rights please refer to the EU regulator in the place where you are located (in the EU).

如果閣下位於香港，閣下還可以登錄 [www.pcpd.org.hk](http://www.pcpd.org.hk) 查找更多關於閣下的權利的資料。如果閣下位於歐洲，如欲了解有關閣下的權利的更多資料，請諮詢閣下所在地區（歐盟）的歐盟監管機構。

If you are not satisfied with how we are processing your personal data, you can make a complaint to The Office of the Privacy Commissioner for Personal Data in Hong Kong through the channels listed below (as these may be updated by them from time to time), or to any other local regulator that may apply.

如果閣下對我們處理閣下的個人資料的方式不滿意，閣下可以通過以下渠道（可能會不時更新）向香港個人資料私隱專員公署或任何其他可能適用的當地監管機構投訴。

- By Post / In Person  
郵寄/當面投訴

**Address:**

地址：

Room 1303,13/F, Sunlight Tower, 248 Queen's Road East, Wanchai, Hong Kong  
香港灣仔皇后大道東 248 號大新金融中心 13 樓 1303 室

**Opening hours of Reception Counter:**

接待處開放時間：

Monday to Friday: 8:45 a.m. to 12:45 p.m. & 1:50 p.m. to 5:40 p.m.  
周一至周五：上午 8:45 — 下午 12:45，下午 1:50 — 下午 5:40

- **By Fax**  
通過傳真發送

You may fax us your completed complaint form at +852 2877 7026.  
閣下可以將填妥的投訴表通過傳真發送至+852 2877 7026。

- **By Email**  
通過電子郵件發送

You may email your completed complaint form to [complaints@pcpd.org.hk](mailto:complaints@pcpd.org.hk).  
閣下可以將填妥的投訴表通過電子郵件發送至 [complaints@pcpd.org.hk](mailto:complaints@pcpd.org.hk)。

- **Complaint Form**  
投訴表

Available here:

[https://www.pcpd.org.hk/english/complaints/how\\_complaint/complaint/files/OPS001\\_e.pdf](https://www.pcpd.org.hk/english/complaints/how_complaint/complaint/files/OPS001_e.pdf)

點擊此處下載：

[https://www.pcpd.org.hk/tc\\_chi/complaints/how\\_complaint/complaint/files/OPS001\\_c.pdf](https://www.pcpd.org.hk/tc_chi/complaints/how_complaint/complaint/files/OPS001_c.pdf)

## **How we process, handle and collect your data**

我們如何處理、處理和收集閣下的資料

We process, handle and collect your personal data in a number of ways, for example:  
我們將以多種方式處理和收集閣下的個人資料，例如：

- From the information you provide to us when you meet us;  
從閣下與我們初識時提供給我們的資料；
- From information about you provided to us by your company or an intermediary;  
閣下所在公司或中介機構向我們提供的有關閣下的資料；
- When you communicate with us by telephone, fax, email or other forms of electronic communication.  
當閣下通過電話、傳真、電子郵件或其他電子通訊方式與我們溝通時。
- In this respect, we may monitor, record and store any such communication;  
對此，我們可能會監控、記錄和儲存任何通信記錄；
- When you complete (or we complete on your behalf) client on-boarding or application or other forms;  
當閣下填寫（或我們代表閣下填寫）客戶引導或申請表或其他表格時；
- From other companies in the Vistra Group;  
從瑞致達集團旗下的其他公司；
- From your agents, advisers, intermediaries, and custodians of your assets;  
從閣下的代理人、顧問、中介機構和資產保管人；

- From publicly available sources or from third parties, most commonly where we need to conduct background checks about you.  
從公開渠道或第三方，通常是我們需要對閣下進行背景調查的情況下。

## **The categories of personal data we collect**

### **我們收集的個人資料類別**

We collect the following categories of personal data about you:

我們會收集有關閣下的以下類別的個人資料：

- Your name and contact information such as your home or business address, email address and telephone number;  
閣下的姓名和聯繫方式，例如：閣下的家庭住址或公司地址、電子郵件地址和電話號碼；
- Biographical information which may confirm your identity including your date of birth, tax identification number and your passport number or national identity card details, country of domicile and/or your nationality;  
可確認閣下身份的個人資料，包括：閣下的出生日期、稅務識別號和閣下的護照號碼或國民身份證詳細資料、居住國及/或閣下的國籍；
- Information relating to your financial situation such as income, expenditure, assets and liabilities, sources of wealth, as well as your bank account details;  
與閣下的財務狀況有關的資料，例如：收入、支出、資產和負債、財富來源以及閣下的銀行賬戶詳細資料；
- Information about your knowledge and experience in the investment field;  
有關閣下在投資領域的知識和經驗的資料；
- An understanding of your goals and objectives in procuring our services;  
了解閣下在購買我們的服務時的目標；
- Information about your employment, education, family or personal circumstances, and interests, where relevant;  
有關閣下的就業經歷、教育背景、家庭或個人情況以及興趣愛好的資料 (如相關)；
- Information to assess whether you may represent a politically exposed person or money laundering risk; and  
用於評估閣下是否可能代表政治敏感人物或構成洗錢風險的資料；及
- any other personal data you may decide to share with us or any member of the Vistra Group.  
閣下可能決定與我們或瑞致達集團的任何成員共享的任何其他個人資料。

## **The purpose for processing your personal data (other than with your consent), how we use that personal data and whom we share it with:**

處理閣下的個人資料的目的 (未經閣下的同意)、我們如何使用個人資料以及我們與誰共享這些資料：

### Performance of a contract

#### 履行合同

We may process your personal data because it is necessary for the performance of a contract or in order to take steps at your request prior to entering into a contract.

我們可能會出於以下原因處理閣下的個人資料：對於履行合同或在簽訂合同前按閣下的要求採取措施有必要。

In this respect, we use your personal data for the following:

對此，我們將閣下的個人資料用於以下用途：

- To prepare a proposal regarding the services we offer;  
編寫有關我們提供的服務的提案；
- To provide the services as set out in our Terms of Engagement or as otherwise agreed with

you from time to time; or

提供我們的委託條款中規定的或不時與閣下另行約定的服務；或

- **To deal with any complaints or feedback you may have.**  
處理閣下可能提出的任何投訴或反饋。

**In this respect, we may share your personal data with, or transfer it to, the following parties:**

對此，我們可能會與以下各方共享或向其傳輸閣下的個人資料：

- **Your agents, advisers, intermediaries, and custodians of your assets who you tell us about;**
- 閣下告知我們的閣下的代理人、顧問、中介機構和資產保管人；
- **Third parties whom we engage to assist in delivering the services to you, including other companies in the Vistra Group;**
- 受我們委託向閣下提供服務的第三方，包括瑞致達集團旗下的其他公司；
- **Our professional advisers where it is necessary for us to obtain their advice or assistance, including lawyers, accountants, IT or public relations advisers;**
- 我們的專業顧問，因為我們有必要獲得他們的建議或幫助，包括：律師、會計師、資訊科技或公共關係顧問；
- **Other third parties such as intermediaries who we introduce to you. We will wherever possible tell you who they are before we introduce you;**
- 我們向閣下介紹的其他第三方，例如：中介機構。在向其他方介紹閣下之前，我們將盡可能告訴閣下他們是誰；
- **Our data storage providers and any other software providers that we require to perform our services.**
- 我們的數據儲存供應商和我們提供服務所需的任何其他軟件供應商。

### Legitimate Interests

#### 合法權益

**We may also process your personal data because it is necessary for our legitimate interests, or sometimes where it is necessary for the legitimate interests of another person.**

我們也可能會出於以下原因處理閣下的個人資料：對實現我們的合法權益或者有時為了確保他人的合法權益所必需。

**In this respect, we may use your personal data for the following:**

對此，我們可將閣下的個人資料用於以下用途：

- **For marketing to you. In this respect, see the separate section on Marketing below;**  
向閣下推銷。對此，請參閱下文有關營銷的單獨部分；
- **Training our staff or monitoring their performance;**  
培訓我們的員工或監督他們的表現；
- **For the administration and management of our business, including recovering money you owe to us, and archiving or statistical analysis; or**  
出於業務的行政管理目的，包括：追回閣下欠我們的錢，以及存檔或統計分析；或
- **Seeking advice on our rights and obligations, such as where we require our own legal advice.**  
就我們的權利和義務尋求建議，例如：我們需要法律建議。

**In this respect we may share your personal data with the following:**

對此，我們可能會與以下各方共享閣下的個人資料：

- **Your agents, advisers, intermediaries, and custodians of your assets who you tell us about;**  
閣下告知我們的閣下的代理人、顧問、中介機構和資產保管人；
- **Third parties whom we engage to assist in delivering the services to you, including other**

companies in the Vistra Group;

受我們委託向閣下提供服務的第三方，包括瑞致達集團旗下的其他公司；

- **Our professional advisers where it is necessary for us to obtain their advice or assistance, including lawyers, accountants, IT or public relations advisers;**  
我們的專業顧問，因為我們有必要獲得他們的建議或幫助，包括：律師、會計師、資訊科技或公共關係顧問；
- **Other third parties such as intermediaries who we introduce to you. We will wherever possible tell you who they are before we introduce you;**  
我們向閣下介紹的其他第三方，例如：中介機構。在向其他方介紹閣下之前，我們將盡可能告訴閣下他們是誰；
- **Our data storage providers and any other software providers that we require to perform our services.**  
我們的數據儲存供應商和我們提供服務所需的任何其他軟件供應商。

## Legal obligations

### 法律義務

We may also process your personal data for our compliance with a legal obligation which we are under.

為了遵守我們所承擔的法律義務，我們也可能會處理閣下的個人資料。

In this respect, we may use your personal data for the following:

對此，我們可將閣下的個人資料用於以下用途：

- **To meet our compliance and regulatory obligations, such as compliance with anti-money laundering laws; or**  
履行我們的合規和監管義務，例如：遵守反洗錢法；或
- **As required by tax authorities or any competent court or legal authority.**  
遵守稅務機關或任何主管法院或法律機構的要求。

In this respect, we may share your personal data with the following:

對此，我們可能會與以下各方共享閣下的個人資料：

- **Our advisers where it is necessary for us to obtain their advice or assistance;**
- 我們的顧問，因為我們有必要獲得他們的建議或幫助；
- **Our auditors where it is necessary as part of their auditing functions;**
- 我們的審計師，共享資料是出於履行其審計職能的必要；
- **Third parties who assist us in conducting background checks;**
- 協助我們進行背景調查的第三方；
- **Other companies in the Vistra Group;**
- 瑞致達集團旗下的其他公司；
- **Relevant regulators or law enforcement agencies where we are required to do so.**
- 要求我們如此的相關監管機構或執法機構。

## **Marketing**

### **營銷**

We may from time to time send you marketing communications about similar services we provide to you, as well as other information in the form of alerts, newsletters and invitations to events or functions which we believe might be of interest to you.

我們可能會不時向閣下發送有關我們向閣下提供的類似服務的營銷資料，以及我們認為閣下可能感興趣的活動或功能的其他資料（以提醒、時事通訊和邀請函等形式）。

We may communicate this to you in a number of ways including by post, telephone, email, SMS or other digital channels.

我們可能會通過多種方式與閣下溝通，包括：郵寄、電話、電子郵件、短信或其他數碼渠道。

If you receive marketing communications from us but do not wish to receive them in the future, you may opt out of receiving them at any time, free of charge, by the following applicable means:

如果閣下收到我們的營銷資料，但希望將來不再收到，閣下可以隨時通過以下適用方式免費退訂：

- unsubscribing by following the “Reply To” instructions contained in the marketing text message;  
按照營銷短訊中的「回覆」說明取消訂閱；
- following the unsubscribe instructions or hyperlink in the email;  
按照電子郵件中的退訂說明或超鏈接操作；
- following the unsubscribe instructions in the mobile application;  
按照移動應用程序中的取消訂閱說明進行操作；
- notifying us that you no longer wish to receive marketing communications when receiving our marketing calls; or  
閣下在接聽我們的推銷電話時告知我們不再希望收到營銷資料；或
- contacting us at the Data Protection Officer address stated above to tell us that you no longer wish to receive marketing communication through any channel.  
通過上述保障資料主任地址與我們聯繫，告訴我們閣下不再希望通過任何渠道接收營銷資料。

We may issue service-related announcements to you when necessary (e.g., new laws, regulations or compliance requirements). You may not be able to opt out of these announcements which are service-related and not promotional in nature.

我們可能會在必要時向閣下發佈與服務相關的公告（例如：新的法律、法規或合規要求）。閣下可能無法選擇拒收這些與服務相關且非促銷性質的公告。

### **Transfer and processing of your personal data outside Hong Kong**

在香港境外傳輸和處理閣下的個人資料

We may transfer, store, or process your personal information in locations outside the Hong Kong SAR. Where the countries to which your personal information is transferred do not offer an equivalent level of protection for personal information to the laws of the Hong Kong SAR, we will ensure that appropriate safeguards and security measures are put in place. We will use appropriate data security safeguards, use contractual confidentiality terms and agreements with third parties, ensure that the jurisdiction has equivalent data protection laws, or seek your explicit consent to the transfer of your personal data to a place outside Hong Kong SAR. You may learn more on the Hong Kong Legislation website for section 33 of the PDPO with respect to using consent for the transfer of personal data outside Hong Kong SAR, which is not yet in force as of the current date.

我們可能會在香港特別行政區以外的地方傳輸、儲存或處理閣下的個人資料。如果接收閣下的個人資料的國家不對個人資料提供與香港特別行政區法律同等程度的保護，我們將確保採取適當的保障措施和安全措施。我們將採取適當的資料安全保障措施，根據合同保密條款和與第三方達成的協議，確保接收資料的司法管轄區有同等的資料保護法律，或將閣下的個人資料傳輸至香港特別行政區以外的地方之前徵求閣下的明確同意。你可以在香港立法網站上查找私隱條例第 33 條關於經過同意將個人資料傳輸至香港特別行政區以外的地方的資料，該條款截至當前日期尚未生效。

### **Retention of your data**

保留閣下的資料

We will only retain your personal data for as long as we have a lawful reason to do so. Vistra will process and store the relevant personal data for the duration of our services or for the duration of the business relationship. Vistra may also store the data for processing in our local servers and Vistra



Group databases, or use third party Cloud vendors and data processors where we have contractual security measures and reassurances of enhanced security measures in place for as long as it is necessary or required in order to fulfil legal, contractual or statutory obligations or for the establishment, exercise or defence of legal claims, and in general where it has a legitimate interest for doing so. In particular:

我們只會在有合法理由的情況下保留閣下的個人資料。瑞致達將在我們提供服務期間或在業務關係存續期間處理和儲存相關個人資料。為了履行法律、合同或法定義務，或為了建立、行使或捍衛合法權利主張，並且在維護合法權益的一般情況下，瑞致達也可能將資料儲存在我們的本地服務器和瑞致達集團資料庫中進行處理，或聘請第三方雲供應商和資料處理者進行處理，在此情況下，我們會採取合同保密措施和增強安全措施。具體而言：

- where we have collected your personal data as required by anti-money laundering legislation, including for identification, screening and reporting, we will retain that personal data for five (5) years after the termination of our relationship, unless we are required to retain this information by another law or for the purposes of court proceedings; or  
如果我們根據反洗錢立法的要求收集閣下的個人資料，包括：用於識別、篩選和報告，我們將業務關係終止後五 (5) 年內保留該個人資料，除非我們需要根據其他法律或出於法院訴訟目的保留該資料；或
- otherwise, we will in most cases retain your personal data for a period of seven years after the termination of our contractual or other relationship with you in case any claims arise out of the provision of our services to you.  
否則，在大多數情況下，我們將在我們與閣下的合同或其他關係終止後七年內保留閣下的個人資料，以防因我們向閣下提供服務而產生任何索賠。

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