

私隱政策聲明

本私隱政策聲明涵蓋余氏國際金銀業股份有限公司、其附屬公司、聯營公司及關聯公司（統稱「本公司」或「我們」）如何收集、使用、管理和保護我們可能向閣下收集或所收集到有關閣下的個人資料（「個人資料」）。此等資料對建立一合適及有效之業務關係，如在與閣下開立之帳戶、建立及提供各項諮詢方面等，尤為重要。敬請閣下詳細閱讀本私隱政策聲明並確保清楚及完全明白內容。

保障閣下的私隱

我們致力按照規定的標準處理閣下的資料，其中包括保障閣下的私隱及確保閣下個人資料的安全，以遵守（在適用情況下）香港特別行政區法例第 486 章《個人資料（私隱）條例》（「條例」），以及歐洲議會和歐盟理事會在 2016 年 4 月 27 日通過有關個人資料處理及自由流動的個人保障的第 2016/679 號歐盟規則（「GDPR」，個人資料保護規則）（如適用）及其他相關法則。

為本私隱政策聲明列明之目的使用或提供閣下的個人資料前，我們可能會因法例規定需要索取閣下的書面同意。在此情況下，我們只會在取得閣下的同意後，才會開始按指定的方式使用閣下的個人資料。倘若閣下未成年或未滿 16 歲或為精神上無能力人仕，在向我們提供任何個人資料前，必須先徵求家庭或監護人之明確同意。如閣下不願意接受下列條款的約束，請停止登入、瀏覽或使用本網站/我們的電子服務。

閣下的個人資料

我們或會收集、使用及保留閣下各種個人資料。為了經營我們的業務（包括核實閣下的身份以偵查、預防及處理欺詐、保安或技術問題、登記、啟動及管理閣下在本公司的帳戶（包括但不限於保證金貴金屬或槓桿式外匯等帳戶）、建立及提供各項財務及諮詢，以及我們的產品和服務的帳單和收費（如適用）（統稱「服務」）及遵從任何適用之政府相關部門、法院、執法或有關當局或監管機構所發佈的法律、規定、指引、規則及／或要求，閣下可能需要提供包括但不限於下列的個人資料：

- (a) 姓名、出生月份及閣下的身份證號碼或其他法定證明文件、旅遊證明文件所記載的其他詳情；
- (b) 閣下聲明國籍/居住地/所在地/個人資訊及相關文件；
- (c) 聯絡資料，包括但不限於閣下的姓名、地址、電話號碼、手提電話號碼及／或電郵地址等；
- (d) 閣下與第三方社交媒體平台經營商分享的個人資料（例如帳戶登入姓名、圖

像、聯絡資料)等；

- (e) 付款資料，包括但不限於信用卡、扣帳卡和其他網上銀行資料；
- (f) 與登記使用我們的服務相關的帳戶詳情或個人資料，包括但不限於相關的PIN、用戶名稱或密碼、帳戶號碼及／或服務號碼；
- (g) 裝置的具體資料，例如硬件模型、作業系統、版本、唯一識別碼、序號、設定配置以及軟件和流動網絡配置；
- (h) 有關閣下如何使用我們的服務的資料，例如閣下的網絡使用情況、閣下如何使用我們的網絡，以及閣下使用我們的服務時的位置；
- (i) 閣下的信用及服務記錄，使我們能評估閣下是否合資格使用我們的服務或處理閣下轉移服務或帳戶的要求；
- (j) 適用的政府相關部門、法院、執法或有關當局或監管機構所要求使我們能遵守任何法律、規定、規則、判決或法庭命令（不論是在香港境內或境外）或與此有關的所有個人資料；及
- (k) 本公司任何成員及／或其各自的承辦商、分包商、中介、代理商、商業夥伴或代表、經紀或承包商可能不時要求就提供服務而言為必需的任何其他個人資料。
- (l) 在某些情況下，如法律有所規定，我們可能會徵求閣下同意我們處理包括但不限於下列類別的「特別個人資料」，使我們能進一步改善服務及／或為閣下提供更適切的類別的資料或內容：
 - (i) 年齡；
 - (ii) 性別及種族；
 - (iii) 婚姻狀況；
 - (iv) 出生月份；
 - (v) 教育程度及專業資格；
 - (vi) 每月的收入範圍；
 - (vii) 嗜好及休閒活動；
 - (viii) 閣下已申請的服務；
 - (ix) 聯絡資料等。

閣下可選擇是否提供上述的特別個人資料。但當所需服務是個人化服務，或產品的提供是建基於閣下已提供一切所需個人資料，若閣下屆時未能提供所需的個人資料，可能會有礙我們向閣下提供該等特定服務。

我們如何收集個人資料

我們會通過不同的方式收集個人資料，包括：

- (a) 直接向閣下收集。例如閣下透過電話或電郵、出席我們的活動、填寫我們某項服務的申請表格或協議，或通過我們的網站、流動應用程式或網上聊天室

- 提交閣下的個人資料，或當閣下聯絡我們提出查詢或要求時，或在日常商業事務中與我們保持聯繫期間，或當我們根據法規要求收集該等個人資料；
- (b) 經閣下同意後向第三方，例如相關的公司、業務合作夥伴、或其他客戶或閣下的代表收集；
 - (c) 從公開資料來源收集；
 - (d) 根據我們內部有關閣下如何使用我們的服務的記錄中收集；
 - (e) 當閣下瀏覽我們的網站或流動應用程式（請參閱下述「私隱資料」）；及／或
 - (f) 當閣下參與由我們或我們的代表舉行的調查或促銷活動等。

參加投票或有獎遊戲等活動

當參與由我們線上媒體或與其他商業夥伴合辦的推廣宣傳活動時，用戶可能不需要註冊成為我們的會員，但我們會要求用戶提供個人資料進行登記。

私隱資料

為了更能滿足閣下的需要和喜好，我們的網頁伺服器會收集與閣下的網站、裝置或應用程式活動有關的個人資料。我們亦會收集伺服器使用量的不記名集體統計資料，使我們能更適當地回應我們網站及流動應用程式用戶的行為模式。這類個人資料可包括但不限於：

- (a) 瀏覽器類型、版本及用戶代理；
- (b) 操作系統；
- (c) IP（互聯網通訊協定）地址及／或網域名稱；
- (d) 連接數據、網頁瀏覽及／或推薦連結的統計數據及／或；
- (e) 裝置識別資料、位置及電話聯絡人；
- (f) 已觀看或搜尋的影片；
- (g) 已點擊的連結或圖像；
- (h) 「曲奇」（cookies）及／或瀏覽器、應用程式或網頁伺服器的日誌記錄；及
- (i) 裝置及軟件特性及／或配置等。

我們的一些網站會在閣下的電腦或裝置內使用「曲奇」（cookies）或類似的追蹤工具，以便我們（例如）為閣下提供個人化的服務及／或於閣下瀏覽不同網頁及／或互聯網期間進行身份識別。此等個人資料可包括但不限於登入及確認資料，以及有關閣下的裝置及閣下在我們網站及流動應用程式內的活動和喜好設定的個人資料。我們的一些網站內含嵌入式第三方功能如影像、地圖及社交媒體應用程式介面等，以提供更佳瀏覽體驗。具此等嵌入式功能的頁面或含功能供應商的

「曲奇」(cookies)。我們不會從此等「曲奇」(cookies)收集資料，亦不會控制此等「曲奇」(cookies)將資料發佈。此等「曲奇」(cookies)或同類技術由第三方擁有並控制，因此該第三方而非我們須對其使用事宜負責。由於第三方可依其需要隨時變動其「曲奇」(cookies)，因此我們無法保證已將第三方所有「曲奇」(cookies)或同類技術列出。閣下應查閱相關第三方網站，以了解詳情。我們的網站在最初會設定為接受「曲奇」。閣下可以透過更改閣下網頁瀏覽器的設定選擇拒絕或刪除「曲奇」的歷史記錄；但是，閣下在更改有關設定後，可能無法如常使用我們網站及／或應用程式的某些功能。（請注意：取消 Cookies 功能後，閣下可能無法進入本網站的某些部分，以致無法享用我們提供的服務。）

此外，本網站上的連結或廣告(如有)，該連結或廣告的其他公司可能會在您的瀏覽器上設置 Cookie 或對其進行識別。第三方廣告商或廣告服務商對 Cookie 的使用不受本私隱政策的約束，但受他們各自私隱政策的約束。

我們如何使用閣下的個人資料

我們可能收集、保留及使用閣下的個人資料以作如下用途：

- (a) 核實閣下的身份；
- (b) 根據閣下聲明的國籍/居住地/所在地/個人資訊，向指定第三方機構提交閣下資料(包括但不限於轉遞帳戶之申請等(如適用))及相關文件；
- (c) 為提供服務給閣下之日常運作；
- (d) 設計供閣下使用之貴金屬交易的服務或相關產品；
- (e) 與任何有關閣下及帳戶之任何用途；
- (f) 處理閣下選用我們的服務及會員的申請；
- (g) 根據條例進行核對程序；
- (h) 核實閣下選用或參加我們的服務、遊戲及／或推廣或其他活動的資格；
- (i) 提供或啟動閣下已申請的服務、會員計劃及／或就有關服務或計劃進行續期；
- (j) 為閣下提供推廣優惠、更新、優惠及活動邀請；
- (k) 向閣下宣傳及促銷我們的服務；
- (l) 提供適合閣下的廣告及網頁內容；
- (m) 提供適合閣下的產品或服務；
- (n) 為我們或我們的客戶提供不記名報告及傳送會員快訊等；
- (o) 遵照香港法例第 615 章《打擊洗錢及恐怖分子資金籌集條例》或其他相關法規進行信用審查及偵查欺詐活動，以及其他合規目的；
- (p) 進行統計、研究或分析，以改進和完善我們為閣下所提供的服務及／或會員計劃；
- (q) 為業務營運及／或商業規劃進行調查及促銷、宣傳及行為評分；
- (r) 進行市場和產品分析作統計或精算報告(包含與任何已識別或可識別的個人

無關的整體數據)；

- (s) 就我們向閣下提供服務處理付款指示、直接扣帳安排及／或賒帳安排；
- (t) 維持和開發我們的業務系統和基礎設施，包括測試及更新該等系統；
- (u) 維持、提升和開發我們的產品及服務；
- (v) 釐定拖欠閣下或閣下拖欠之債務金額；(如有)
- (w) 向閣下收取拖欠之金額、利息及手續費；(如有)
- (x) 協助日常之借貸事項；(如有)
- (y) 協助借貸上所需之審核工作；(如有)
- (z) 估計閣下借貸款額之水平；(如有)
- (aa) 確定本公司對閣下或閣下對本公司的債務；
- (bb) 向閣下及為閣下提供擔保或抵押的人士追收欠款；
- (cc) 協助其他機構進行信貸審查和追討債務；
- (dd) 與任何前述部份相關之任何用途；
- (ee) 就我們向閣下提供服務及／或會員計劃，遵守適用的政府相關部門、法院、執法或監管或調查當局所規定的香港境內或海外適用法律，包括協助預防或偵查犯罪或潛在犯罪活動；及
- (ff) 發佈我們的刊物及研究資料，以及我們的商業合作夥伴及對手方的刊物及研究資料。

我們使用閣下的個人資料（包括我們如何披露閣下的個人資料）的法律依據

我們有合法權益妥善地執行服務。此外，為履行閣下所要求的服務，我們可能有必要使用閣下的個人資料。在適用法律和規例准許的範圍內，我們或會將您的個人資料披露給本公司以外的機構或人士（可能位於香港境內或海外）（統稱「機構」），從而提供閣下所要求的服務。向該等機構披露閣下個人資料之目的，只會嚴格限制於使我們能向閣下提供我們的服務，而不適用於並非由我們擁有或控制的公司政策，也不適用於並非由本公司聘用或管理的人士。

在上述的某些情況中，我們或需根據法律規定徵求閣下同意我們使用閣下的特別個人資料。

下列機構為我們的業務和運作提供支持服務，包括但不限於：

- (a) 客戶查詢；
- (b) 郵件操作；
- (c) 帳單和欠款收取；
- (d) 資訊科技服務；
- (e) 安裝、保養及維修服務；
- (f) 市場促銷、廣告及電話促銷服務；

- (g) 市場調查；
- (h) 客戶使用量及行為分析；
- (i) 程序管理；
- (j) 調查；及
- (k) 網站使用量分析等。

我們會採取必要的措施，以確保該等機構是受有關保障閣下個人資料的保密及私隱責任的約束，且該等機構僅就他們受聘執行的服務之目的，而不能為自用或其他目的（包括直接促銷）使用閣下的個人資料。

此外，我們可能會向下列各方披露閣下的個人資料：

- (a) 本公司及指定之公司，用作提供服務或產品推廣之工作；
- (b) 任何本公司的董事、高級職員、僱員或代表（在執行本公司業務時）；
- (c) 經本公司授權處理保密資料之人士；
- (d) 閣下的授權代表及／或法律顧問（在閣下要求下）；
- (e) 下述為提供行政、付款、收款、商業、法律及／或業務支持的機構：
- (f) 電訊網絡營運商；
- (g) 行政、電訊、電腦、數據處理承包商；
- (h) 線上網絡維護承辦商；
- (i) 證券結算、代理人、保管人；
- (j) 我們的附屬成員、海外辦事處、委托人、受讓方及代表；
- (k) 我們的專業顧問，包括我們的會計師、核數師、律師及保險人；
- (l) 第三方金融機構、銀行、酒店、保險公司、保險經紀、承保人、證券及投資服務供應商、帳單代理及其他商業夥伴，為會員計劃作兌換用途，包括但不限於協助會員登記參與有關的活動；
- (m) 任何閣下欲與其或已與其建立業務關係之財務機構及其聯繫機構；
- (n) 信貸資料服務機構及（如有失責事件）財務公司；
- (o) 政府及監管機構及其他法律規定或授權的機構；
- (p) 有關我們的全部或部份運營業務的任何潛在或實際參與者、委托人或受讓方；及／或
- (q) 慈善或非牟利機構等。

直接促銷 (如適用)

我們在遵守適用法律、規則、規例和牌照規定的情況下，或會使用閣下的資料（包括但不限於姓名、聯絡資料、電話號碼、住宅／辦公室地址、電郵地址、產品及服務組合資料、交易模式、財務背景及人口統計數據的資料），以便我們（包括我們及其各子公司、附屬成員及關聯公司）及我們各自的經銷商、供應商、授權

人、提供商、廣告客戶及／或業務合作夥伴（統稱「服務供應商」）為閣下提供直接促銷資料（我們可能會、也可能不會就此獲得報酬），包括向閣下發出與我們及／或服務供應商提供的服務有關的禮品、折扣、尊享優惠、優惠和推廣的通知、金融與投資建議、與本交易有關的用途、本公司就前述產品或服務之業務推廣和宣傳活動及／或最新情報，包括但不限於：娛樂、資訊服務（例如天氣、財經和新聞資訊）、裝置配件、流動應用程式和軟件、生活方式、社交活動、旅遊、酒精及煙草、運動、音樂、遊戲、交通、家居產品、餐飲、酒店、銀行、金融、財務、保險、財富管理服務、投資、教育、健康及保健、美容及化妝品產品和服務、娛樂、電影、戲院、時尚及配飾、電子及電腦產品、社交網絡、科技、電子商務、物流、零售、地產及商場、家居佈置、媒體及高端消費類產品及服務等。該等促銷可透過多種方式進行（包括以郵件、於帳單內夾寄／簡訊、電郵、數字短訊、多媒體短訊、即時消息、應用程式推送通知、透過電話或社交媒體或網站顯示廣告或其他方式）。

在將你的個人資料用作本私穩聲明所述的目的之前，我們可能會因法例規定須要索取閣下的書面同意。在此情況下，我們只會在取得閣下書面同意後，才開始使用及提供你的個人資料作任何推廣或市場用途。

我們尊重所有停止使用個人資料作直接促銷的要求，你可選擇拒絕接收直接促銷資料及／或有關服務、會員計劃及／或本公司的任何通訊。與此同時，若你有意重新收取該等資料（重收促銷資料要求只適用於以往曾經拒絕接收該等資料及／或有關服務、會員計劃的客戶），你可連同註冊名字、帳戶號碼、註冊電話號碼或登入帳戶名稱（如適用）等郵寄通知我們的保障資料主任，告知我們你願意收取這些資料。

轉移個人資料至香港以外地方

本公司在有需要時會審慎地將你的個人資料轉移至香港特別行政區以外的地方以達到不同目的，例如預防、偵查或調查犯罪行為、或以達到儲存、處理此等資料及其他收集資料之目的。如本公司將你的個人資料轉移至香港特別行政區以外的地方，該轉移會遵守條例、相關法規及 GDPR（如適用）的現行之規定。

我們重視閣下個人資料的安全性

我們盡力確保所有我們客戶的個人資料均儲存於可靠安全的地方。該等個人資料只有經我們授權的僱員或在本私穩聲明中提及的其他機構方可查閱。若我們將你的個人資料轉交予第三方機構處理，我們會盡量確保該等機構有適當的安全措施來保護你的個人資料的安全性並遵守有關個人資料保護的適用原則。

收到你的個人資料的一方可能會在海外處理這些個人資料。若閣下欲瞭解本公司爲了確保你的個人資料得到充分保護而使用的安全措施，閣下可以與本公司聯絡，索取更多資料。

個人資料的保存

本公司將會根據內部政策，持有你的個人資料。本公司的政策符合條例及 GDPR（如適用），及包括以下宗旨：

- (a) 個人資料會保存至達到與收集上述資料之原來目的，或直接有關之目的為止；除非上述個人資料可根據任何適用法律、法規或合約規定須予以保存；及
- (b) 基於上述標準及本公司的內部程序，個人資料會在本公司的電子、人手及其他儲存系統中被清除。

連結

我們網站及流動應用程式（如有）或包含可通往其他地址、網頁及由第三者營運的流動應用程式的鏈接。我們無法控制該等被鏈接網站、網頁及流動和電視應用程式的內容或該等網站、網頁及流動應用程式營運商處理閣下個人資料的方式，並概不對該等第三方網站、網頁或流動應用程式的內容負責。閣下應審閱該第三者網站、網頁及流動應用程式上的私隱政策，以瞭解該等第三者可能使用閣下個人資料的方式。

閣下查閱、更正及刪除個人資料的權利

我們採取一切合理的預防措施，以確保我們收集、使用及披露的個人資料是準確、完整和最新的。然而，個人資料的準確性在很大程度上取決於你提供的個人資料。你有權要求查閱和更正你的個人資料，我們建議你：

- (a) 當閣下發現個人資料記錄有任何錯誤時請通知我們；及
- (b) 請通知我們若閣下的個人資料有所改變或更新。

若閣下希望查閱或更正我們持有的閣下的任何個人資料，或要求我們刪除任何不再因爲我們提供的服務而需要保存的資料，你可以按照下述之「聯絡方式」與我們聯絡。

如閣下希望查閱和更正你的個人資料，行使閣下的查閱及修正權利，你可以按照下述之「聯絡方式」致函本公司的保障資料主任。

閣下可以拒絕與我們分享你的個人資料及／或撤回你作出的任何同意，在這種情

況下，我們可能無法向你提供我們的某些服務。

除非適用的法律允許本公司持有或處理你的個人資料，否則，閣下可以隨時以合法的理由反對我們持有或處理你的個人資料。

敏感資料

除非我們特別要求或請求，否則請勿透過本網站或社交平台向我們寄送或公開任何個人敏感資料(例如有關種族、政治取向、宗教或其他信仰、健康、犯罪紀錄或商會成員等內容)。如我們需要特別要求或請求您提供個人敏感資料，我們會先徵得您的明確同意。

聯絡方式

任何有關本公司是否遵從條例及 GDPR（如適用）的責任查詢及任何查閱、更改或刪除個人資料的請求，請連同閣下簽署確認的身份證明文件副本發電郵至 cs@99gold.com.hk、傳真至 3748 8498 或致電 3748 8488 與本公司的客戶服務員聯絡。

如對有關個人資料之處理有任何疑問，請與我們聯絡，我們會盡力解決閣下的疑問。

本私隱政策聲明或曾經不時修訂，所有個人資料之處理將受制於本私隱政策聲明的最新版本。若中、英文版本有歧義之處，概以中文版本為準。

我們會定期檢討《私隱政策聲明》。本私隱政策聲明的最近更新日期為 2019 年 5 月。

Privacy Policy Statement

This Privacy Policy Statement sets out how we collect, use, manage and protect the personal data or information (“Data”) that we may collect from or about you. It applies to all individuals whose Data may be handled, whether as controller or processor, by YUS International Bullion Limited (collectively "YIB", "we", "us" or "our", its subsidiaries, affiliates and associated companies). These data are of utmost importance in the development of suitable and effective business relationship, in particular, your opening of account and establishment and provision of various consultations for you. You shall read this Privacy Policy Statement carefully so as to ensure that you fully and clearly understand the contents herein.

Protecting your privacy

We are dedicated to processing your Data in accordance with the required standards. This includes protecting your privacy and ensuring the security of your Data in compliance with, where applicable, the requirements of the Personal Data (Privacy) Ordinance (Chapter 486 of the Laws of Hong Kong) (the “Ordinance”), Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (the “GDPR”) and other relevant regulations where applicable.

Before using and providing your Data for the purposes as set out in this Privacy Policy Statement, we may be required by law to obtain your written consent, and in such cases, only after having obtained such written consent, may we use your Data in the manner as specified. If you are a minor or under 16 years old or a person who are mentally incapable, you must obtain express consent from your parents or guardian before providing any personal data to us. If you do not accept the following terms of this policy, please stop accessing, browsing or using this website/our e-services.

Your Data

We may collect, use and hold a range of different Data about you. For the purposes of carrying on our business (including the verification of your identity to detect, prevent and address fraud, security or technical issues, the registration, activation and management of your account with us (including but not limited to the bullion account and forex account), developing and providing various financial and consultation services and the billing and charging of our products and services (if applicable) (collectively, “Service(s)”)) and

complying with laws, rules, guidelines, regulations and/or requests issued by applicable government authorities, courts, law enforcement or other authorities or regulatory bodies, you may be requested to provide Data such as, but not limited to:

- (a) the name, birth month and other details documented on your passport or other legal identity card and/or travel document;
- (b) the nationality/place of residence/location/personal information declared by you and other relevant documents;
- (c) contact details including but not limited to name, address, phone number, mobile telephone number and/or email address, etc.;
- (d) Data that you have shared with third party social media platform operators (e.g. account login name, profile picture, contact details), etc.;
- (e) payment details including but not limited to credit card, debit card and other electronic banking Data;
- (f) account details or Data relating to Services registered with us including but not limited to the relevant PIN, username or password, account numbers and/or service numbers;
- (g) device specific information such as hardware model, operating system, version, unique device identifier, serial numbers, setting configurations and software and mobile network configuration;
- (h) information about how you use our Services such as your network usage, how you use our network, and your location when you are using our Services;
- (i) your credit and service history to enable us to assess your eligibility to our offers of Services or to accommodate your request for transfer of Services or your account with us;
- (j) all Data requested by applicable government authorities, courts, law enforcement or other authorities or regulatory bodies to enable us to comply with or in connection with any law, rule, regulation, judgment or court order (whether within or outside of Hong Kong); and
- (k) any other Data as may be required by any members of us and/or their respective contractors, sub-contractors, intermediaries, agents, business partners or representatives, brokers, underwriters from time to time and which is necessary for the provision of the Services.
- (l) In some instances, where required by law to do so, we may seek your consent to process the following types of “Special Data” to us so that we may further improve our Services and/or better tailor the type of information or content that we present to you:
 - (i) age;
 - (ii) gender and ethnicity;

- (iii) marital status;
- (iv) month of birth;
- (v) education and profession;
- (vi) monthly income range;
- (vii) hobbies and leisure activities;
- (viii) the Services that you have subscribed for; and
- (ix) contact details, etc.

Provision of the Special Data mentioned immediately above is optional although, where the requested Service is a personalised Service or provision of a product is dependent upon your provision of all requested Data, failure to provide the requested Data may prevent us from providing those particular Services to you.

How we collect Data

We collect Data in a number of ways, including from:

- (a) you directly, for example, when you provide Data by phone or via email, attend our functions, complete an application form or agreement for one of our Services, or when you submit your Data through our websites, mobile apps, or online chat sessions; or when you contact us with a query or request; or during the ordinary course of the continuation of our business relationship with you; or when we are legally required to do so;
- (b) third parties such as related entities, business partners, or other customers, or your representatives with appropriate consent from you;
- (c) publicly available sources;
- (d) our own records of how you use our Services;
- (e) your visits on our websites, or mobile apps (see “Privacy Data” section below); and/or
- (f) your participation in surveys or marketing promotions organised by us or on our behalf, etc.

Participation in Voting Activities or Activities with Prize Incentives

When participating in promotional activities organized by our online media or co-organized by our business parties, users may not be required to be registered as our member but will be required to provide personal data for registration.

Privacy Data

To better serve your needs and preferences, our web servers may collect Data relating to your website, device or app activity. We may also collect aggregated, anonymous, statistical data on the server's usage so that we may better cater to the behaviour of users of our websites and mobile apps. This type of Data may include, but is not limited to:

- (a) browser type, version and user agent;
- (b) operating system;
- (c) IP (Internet Protocol) address and/or domain name;
- (d) connection data, statistics on page views and/or referral URLs;
- (e) device ID, location and phone contacts;
- (f) videos watched or searched for;
- (g) links or images clicked on;
- (h) cookies and/or browser, app or web server log data; and
- (i) device and software characteristics and/or configuration.

Some of our websites use cookies or similar tracking tools on your machine or device in order for us to, for example, personalise your user experience and/or maintain your identity across multiple webpages and/or Internet sessions. This Data may include, but is not limited to, relevant login and authentication details as well as Data relating to your activities and the preference configurations on your device and across our websites and mobile apps. Our Website has embedded third party features such as videos, maps and social media apps that provide you with a better browsing experience. Pages with these embedded features may present cookies from feature providers. We do not collect information from these cookies and do not control the dissemination of these cookies. These cookies or similar technologies are owned and controlled by third parties, and therefore the third parties – and not NMG – are responsible for their use. As such, we cannot guarantee that we have listed every cookie or similar technology you might get from a third party since a third party could change them at any time as their needs change. You should check the relevant third party website for more information about these. Our websites are initially set up to accept cookies. You can opt-out of or delete historical cookies by changing the settings on your web browsers; however, if you do so, you may find that certain features on our website and/or our app do not work properly. (Note: Disabling the cookies function may cause inaccessibility to some parts of our websites and thus you may not be able to enjoy our Services.)

Apart from that, as for any link or advertisement on our websites (if any), its owner may set or identify cookies on your browser. The use of cookies by third-party advertisers or advertising providers is not subject to this Privacy Policy, but their respective privacy

policies.

How we use your Data

We may collect, retain and use your Data for the following purposes:

- (a) to verify your identity;
- (b) to submit your information (including but not limited to the application for the transfer of the account (if applicable)) and related documents to the designated third party institution according to your declared nationality/place of residence/location/personal information;
- (c) to facilitate daily operations of services provided to you;
- (d) to tailor-make services or related products in relation to your bullion transactions;
- (e) to provide any Services in relation to your account held with us;
- (f) to process your application to subscribe to our Services;
- (g) to carry out matching procedures, as defined under the Ordinance;
- (h) to verify your eligibility to our offers of Services, games and/or promotions or other events;
- (i) to provide, activate and/or renew Services, membership program and/or relevant services or plans that you may have subscribed for;
- (j) to provide you with promotional benefits, updates, offers and invitation to events;
- (k) to promote and market our Services to you;
- (l) to provide suitable advertisement and website contents to you;
- (m) to provide suitable products or services to you;
- (n) to provide anonymous report and to send member notice to us or our clients;
- (o) to conduct credit checks and detect fraudulent activities in compliance with the Anti-Money Laundering and Counter-Terrorist Financing Ordinance (Chapter 615 of the Laws of Hong Kong) or any other relevant regulations and in relation to other compliance purposes;
- (p) to perform statistical analyses or research or analyses so that we may improve and optimise the Services that can be made available to you;
- (q) to conduct surveys and marketing, promotional, behavioural scoring for business operations and/or planning purposes;
- (r) to carry out market and product analyses in order to generate statistical or actuarial reports (containing aggregated data that does not relate to any identified or identifiable individual);
- (s) to process any payment instructions, direct debit facilities and/or credit facilities in relation to our supply of Services to you;
- (t) to maintain and develop our business systems and infrastructure, including testing and

- upgrading of these systems;
- (u) to maintain, enhance and develop our products and service offerings;
 - (v) to determine the amount of debt owed by you or your default; (if any)
 - (w) to charge you arrears, interest and handling fees; (if any)
 - (x) to assist in daily lending matters; (if any)
 - (y) to assist in the required review of the loan; (if any)
 - (z) to evaluate the level of indebtedness owed to or by you from time to time; (if any)
 - (aa) to determine the amount of indebtedness owed to or by you;
 - (bb) to collect amounts outstanding from you and those providing security for your obligation;
 - (cc) to assist other financial institutions to conduct credit checks and collect debts;
 - (dd) to perform any acts in relation to any of the aforesaid;
 - (ee) to comply with applicable laws in or outside Hong Kong as may be required by applicable government authorities, courts, law enforcement, or regulatory or investigation bodies, in relation to the supply of Services and/or loyalty programs to you, including to assist in the prevention, detection of crime or possible criminal activities; and
 - (ff) to distribute our publications and research materials as well as those of our business partners and counterparties.

Our legal basis for using your Data including how we disclose your Data

We have a legitimate interest in properly administering the Services. In addition, our use of your personal data may be necessary for the performance of the Services that you have requested. In order to provide the Services that you have requested, we may, to the extent permissible under applicable laws and regulations, disclose your Data to organisations or parties outside of YIB (which may be within or outside of Hong Kong) (collectively, “Organisations”). Your Data is disclosed to these Organisations for the strict purpose of enabling us to supply our Services to you but is not applicable to any Organisations which are not owned by YIB or of which its company policies are not controlled by YIB as well as any persons employed or managed by YIB.

In some circumstances as mentioned above, we may need to ask for your consent to use your Special Data where required by law to do so.

These Organisations provide support services to our businesses and operations including without limitation:

- (a) customer enquiries;

- (b) mailing operations;
- (c) billing and debt-recovery functions;
- (d) information technology services;
- (e) installation, maintenance and repair services;
- (f) marketing, advertising and telemarketing services;
- (g) market research;
- (h) customer usage and behavioural analysis;
- (i) process management;
- (j) surveys; and
- (k) website usage analysis, etc.

We take the required steps to ensure that these Organisations are bound by appropriate confidentiality and privacy obligations in relation to the protection of your Data and that they use your Data for the sole purpose of carrying out the services for which they have been engaged, and not for their own or other purposes (including direct marketing).

In addition, we may disclose your Data:

- (a) to us and the designated company for the purpose of providing services or product promotion;
- (b) to any director, officer, employee or representative of the company (when performing the business of the company);
- (c) to any person authorized by us to handle confidential information;
- (d) to your authorised representatives and/or your legal advisers when requested by you to do so;
- (e) for the purposes of providing administrative, payment, collection, business, legal and/or operational support, to the following parties:
 - (i) telecommunications network operators;
 - (ii) administrative, telecommunications, computer, data processing contractors;
 - (iii) online network maintenance contractors;
 - (iv) securities settlement, agent, custodian;
 - (v) our affiliates, overseas offices, assignees, transferees and representatives;
 - (vi) our professional advisers, including our accountants, auditors, lawyers and insurers;
- (f) to third party financial institutions, banks, hotels, insurance companies, insurance brokers, underwriters, securities and investment service providers, billing agents and various business collaborators for reward redemption purposes and benefits applicable to members of our loyalty programs, including without limitation for the

- purpose of registering members for loyalty program related events;
- (g) to any financial institution and its affiliates with whom you wish to establish or have a business relationship with;
 - (h) to a credit reference agency and (if there is a default) financial company;
 - (i) to government and regulatory authorities and other organisations, as required or authorised by law;
 - (j) to any proposed or actual participant, assignee or transferee of all or any part of the relevant member of our operations or business; and/or
 - (k) to charities or non-profit organisations, etc.

Direct Marketing (if applicable)

We will provide you with relevant magazines and online media information, promotional campaigns and client advertising information. We may, in compliance with applicable laws, rules, regulations and licence requirements, use your Data (including without limitation name, contact information, phone number, residential/office address, email address, product and services combination information, transaction pattern, financial background and population statistics), for us (including NMG and its respective subsidiaries, affiliates and associated companies) and our respective dealers, suppliers, licensors, providers, advertising clients and/or business partners (collectively, “Service Providers”)) to provide you with direct marketing content (pursuant to which we may or may not receive remuneration in return), including sending to you notices and/or updates about gifts, discounts, privileged offers, benefits and promotions related to Services offered by us, financial and investment advice, any use related to the transaction, business promotion and promotion activities of the company for the aforementioned products or services and/or the Service Providers, including without limitation: entertainment, information services (such as weather, finance and news information), device accessories, mobile applications and software, lifestyle, networking events, travelling, alcohol and tobacco, sports, music, gaming, transportation, household products, food and beverages, hotel, banking, finance, loan, insurance, wealth management services, investments, education, health and wellness, beauty and cosmetics products and services, entertainment, films, cinemas, fashion and accessories, computers and electronics, social networking, technology, e-commerce, logistics, retail, real estates and shopping malls, home and décor, media and high-end consumer products and services. Marketing may be carried out in a variety of ways (such as in the form of a letter, bill insert/message, email, digital SMS, MMS, instant message, app push notification, by telephone, social media or advertisements on websites or other means).

Before using and providing your Data for the purposes as set out in this Privacy Policy Statement, where we are required by law to obtain your written consent, and in such cases, only after having obtained such written consent, may we use and provide your Data for any promotional or marketing purpose.

We will honour each individual's request to not use his/her Data for the purposes of direct marketing. You may opt-out from receiving direct marketing material and/or communications from the relevant Service and/or any notices from us. At the same time, you may resume receiving the same (if you have previously opted-out of receiving such material and/or communications from the relevant Service) by making a written request to our Data Protection Officer together with your registered name and service account number, registered telephone number or login name (as applicable).

Transfer of Data outside Hong Kong

At times it may be necessary and/or prudent for us to transfer your Data to places outside of Hong Kong, for instance, for the prevention, detection or investigation of crime or for storage, processing and other purposes for which the Data were collected. In the event that we do transfer your Data to places outside of Hong Kong, we will do so in compliance with the prevailing requirements of the Ordinance, other relevant regulations and the GDPR where applicable.

The safety of your Data is important to us

All required efforts are made to ensure that any Data held by us is stored in a secure and safe place and is accessible only by our authorised employees or other Organisations referred to in this Privacy Policy Statement.

When we pass your Data to third party Organisations for them to process, we seek to ensure that they have appropriate security measures in place to keep your Data safe and to comply with applicable principles in relation to data protection. Some of the people we share your Data with may process it overseas. You can contact us for more information about the safeguards we use to ensure that your Data is adequately protected in these circumstances.

Retention of your Data

We will retain your Data in accordance with our internal policies. Our policies are in compliance with the Ordinance and the GDPR where applicable, and cover the following

principles:

- (a) Data will only be retained for as long as is necessary to fulfil the original or directly related purposes for which it was collected, unless the Data is also retained to satisfy any applicable legal, regulatory or contractual obligations; and
- (b) Data are purged from our electronic, manual and other filing systems based on the above criteria and our internal procedures.

Links

Our websites and mobile applications (if any) may contain links to other websites, webpages and mobile applications operated by third parties. We have no control over the content of the linked websites, webpages and mobile applications or the way in which the operators of those websites, webpages and mobile applications deal with your Data, and are not responsible for the content of such third party websites, webpages or mobile applications. You should review the privacy policy of such third party websites, webpages and mobile applications to understand the ways in which your Data may be used by those third parties.

Your right to access, correct and delete Data

We take all reasonable precautions to ensure that the Data we collect, use and disclose is accurate, complete and up-to-date. However, the accuracy of that Data depends to a large extent on the Data you provide. You have a right to request access to, and correction of, your Data and we recommend that you:

- (a) let us know if there are any errors in your Data; and
- (b) keep us up-to-date with changes to your Data.

If you wish to access or amend any of your Data we hold, or request that we delete any of your information that is no longer necessary for the provision of our Services, you may contact us in the manner as set forth under the “How to Contact Us” section.

You may exercise your right of access and correction by writing to our Data Protection Officer at the details stated in the “How to contact us” section below.

You may decline to share Data with us and/or withdraw any consents which you may have provided, in which case, we may not be able to provide you with some of our Services.

At any time, you may object to us holding or processing your Data, on legitimate grounds,

save and except as otherwise permitted by the applicable law.

Sensitive Data

Unless specially required or requested by us, please do not send or publish any personal sensitive data (e.g. contents in relations to race, political views, religious or other beliefs, health record, criminal record or chamber membership, etc.) to us or through our websites or social media platforms. If we specially required or requested your provision of sensitive data, we must obtain your prior express consent.

How to contact us

For all issues and enquiries regarding our compliance with our obligations under the Ordinance and the GDPR where applicable, and any request for access to, correction or deletion of your Data, please contact our Customer Service Officer together with your signed proof of identity documents via email to cs@99gold.com.hk, fax to 3748 8498 or telephone at 3748 8488.

To raise an issue regarding our handling of your Data, please contact us in order that we can attempt to resolve your issue.

This Privacy Policy Statement may be amended from time to time and all handling of Data will be governed by the most recent version of this Privacy Policy Statement, available on our website. If there is any inconsistency between the English and Chinese versions of the Privacy Policy Statement, the Chinese version will prevail.

We keep our privacy policy statement under regular review. This privacy policy statement was last updated in May 2019.