



Hang Seng Investment Management Limited ("HSVM")

**Notice to Investors, Distributors, Discretionary Mandate Clients
(collectively "Clients") and Other Individuals relating
to the Personal Data (Privacy) Ordinance (the "Ordinance")**

1. From time to time, it is necessary for Clients and various other individuals (including without limitation applicants for investment management or advisory services, shareholders, directors, controlling persons, officers and managers of a Client or applicant, partners or members of a partnership, beneficial owner, trustee, settlor or protector of a trust, account holder of a designated account, payee of a designated payment, representative, agent or nominee of a Client, or any other persons with whom a Client has a relationship that is relevant to the Client's relationship with HSVM) (collectively "**data subjects**") to supply HSVM with data in connection with various services HSVM may provide from time to time, including without limitation the opening or continuation of accounts or provision of related investment management or advisory services, the applications for subscription or creation (collectively "subscription"), switching, redemption and/or transfer of investment fund(s) managed by HSVM, the establishment or continuation of the data subjects' relationship with HSVM, or any matters carried out in compliance with any laws, guidelines or requests issued by regulatory or other authorities (the "**Services**").
2. Failure to supply such data may result in HSVM being unable to provide its Services.
3. It is also the case that data are collected from (i) data subjects in their application for or in the ordinary course of the continuation of the Services by HSVM, for example investment management or advisory services, (ii) a person acting on behalf of the data subjects whose data are provided, (iii) data subjects' use of HSVM's websites, including in accordance with HSVM's Personal Information Collection Statement and Internet Privacy Policy Statement, and (iv) other sources. Data may also be generated or combined with other information available to HSVM or any member of the HSBC Group ("HSBC Group" means HSBC Holdings plc, its affiliates, subsidiaries, associated entities and any of their branches and offices (together or individually) and "member of the HSBC Group" has the same meaning).
4. The purposes for which data relating to a data subject may be used are as follows:
 - (i) considering applications for Services provided to data subjects or subscription, switching, redemption and/or transfer of investment funds;
 - (ii) the daily operation of Services provided to data subjects;
 - (iii) designing investment management or advisory services or related products for data subjects; the on-going compliance with selling and holding restrictions of investment funds and the establishment and/or continuation of the relationship between HSVM and the Clients;
 - (iv) analysing how data subjects access and use the Services or HSVM's services including services available on HSVM's websites from time to time;

- (v) the enforcement of data subjects' obligations;
- (vi) meeting obligations or requirements to make disclosure under the requirements or arrangements, whether compulsory or voluntary, of HSVM or any member of the HSBC Group are expected to comply with, or in connection with:
 - (i) any law, regulation, judgment, court order, voluntary code, sanctions regime, within or outside the Hong Kong Special Administrative Region ("**Hong Kong**") existing currently and in the future ("**Laws**"), (e.g. the Securities and Futures Ordinance and its subsidiary legislations, the Inland Revenue Ordinance and its provisions including those concerning automatic exchange of financial account information);
 - (ii) any regulations, guidelines, guidance or code requests given or issued by any legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations of financial services providers within or outside Hong Kong existing currently and in the future and any guidance, internal policies or procedures (e.g. guidelines or guidance given or issued by the Securities and Futures Commission or the Inland Revenue Department including those concerning automatic exchange of financial account information);
 - (iii) any present or future contractual or other commitment with local or foreign legal, regulatory, judicial, administrative, public or law enforcement body, or governmental, tax, revenue, monetary, securities or futures exchange, court, central bank or other authorities, or self-regulatory or industry bodies or associations of financial service providers or any of their agents with jurisdiction over all or any part of the HSBC Group (together the "**Authorities**" and each an "**Authority**") that is assumed by, imposed on or applicable to HSVM or any member of the HSBC Group; or
 - (iv) any agreement or treaty between Authorities;
- (vii) complying with any obligations, requirements, policies, procedures, measures or arrangements for sharing data and information within the HSBC Group and/or any other use of data and information in accordance with any programmes for compliance with sanctions or prevention or detection of money laundering, terrorist financing or other unlawful activities;
- (viii) conducting any action to meet obligations of HSVM or any member of the HSBC Group to comply with Laws or guidance or regulatory requests relating to or in connection with the detection, investigation and prevention of money laundering, terrorist financing, bribery, corruption, tax evasion, fraud, evasion of economic or trade sanctions and/or any acts or attempts to circumvent or violate any Laws relating to these matters;
- (ix) meeting any obligations of HSVM or any member of the HSBC Group to comply with any demand or request from the Authorities;
- (x) enabling an actual or proposed assignee of HSVM, or participant or sub-participant of HSVM's rights in respect of the data subject to evaluate the transaction intended to be the subject of the assignment, participation or sub-participation; and
- (xi) purposes relating thereto.

5. Data held by HSVM or a member of the HSBC Group relating to a data subject will be kept confidential but HSVM or a member of the HSBC Group may provide such information to the following parties (whether within or outside Hong Kong) for the purposes set out in paragraph 4 above:
- (i) any agents, contractors, sub-contractors, service providers or associates of the HSBC Group (including their employees, directors, officers, agents, contractors, service providers, and professional advisers);
 - (ii) any third party service provider who provides administrative, computer, payment, securities clearing or other services to HSVM in connection with the operation of its business (including their employees, directors and officers);
 - (iii) any Authorities;
 - (iv) any person under a duty of confidentiality to HSVM including a member of the HSBC Group which has undertaken to keep such information confidential;
 - (v) the drawee bank providing a copy of a paid cheque (which may contain information about the payee) to the drawer;
 - (vi) any persons acting on behalf of an individual whose data are provided, payment recipients, beneficiaries, account nominees, intermediary, correspondent and agent banks, clearing houses, clearing or settlement systems, market counterparties, upstream withholding agents, swap or trade repositories, stock exchanges, companies in which the Client has an interest in securities (where such securities are held by HSVM or any member of the HSBC Group) or a person making any payment into the Client's account;
 - (vii) any person to whom HSVM or any member of the HSBC Group is under an obligation or required or expected to make disclosure for the purposes set out in, or in connection with, paragraph 4(viii), 4(ix) or 4(x);
 - (viii) any actual or proposed assignee of HSVM or participant or sub-participant or transferee of HSVM's rights in respect of the data subject;
 - (i) any member of the HSBC Group;
 - (ii) third party financial institutions, as well as securities and investment services providers; and
 - (iii) external service providers (including but not limited to mailing houses, data processing companies and information technology companies) that HSVM engages for the purposes set out in paragraph 4 above.

Such information may be transferred to a place outside Hong Kong.

6. Under and in accordance with the terms of the Ordinance, any data subject has the right:
- (i) to check whether HSVM holds data about him and of access to such data;
 - (ii) to require HSVM to correct any data relating to him which is inaccurate; and
 - (iii) to ascertain HSVM's policies and practices in relation to data and to be informed of the kind of personal data held by HSVM.

7. In accordance with the terms of the Ordinance, HSVM has the right to charge a reasonable fee for the processing of any data access request.
8. 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 is as follows:

Data Protection Officer

Hang Seng Investment Management Limited

83 Des Voeux Road Central

Hong Kong SAR

Fax: (852) 2868 4042

9. Nothing in this Notice shall limit the rights of data subjects under the Ordinance.

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