

**PingPong Intelligence Limited
Privacy Policy Statement**

PingPong Intelligence Limited (“**we**”, “**us**” or “**our**”) is committed to protecting and safeguarding the privacy, confidentiality and security of the personal information of an individual client or a director, officer, employee, agent or other representative of a client (“**Client**”, “**you**” or “**your**”) to whom services and products may be provided. It is our responsibility to comply with the requirements in Personal Data (Privacy) Ordinance (Cap. 486 of the Laws of Hong Kong) (“**PDPO**”).

This Privacy Policy Statement (“**Statement**”) sets out our privacy policies and procedures, which highlights our commitment to protecting personal data privacy in accordance with the requirements under the PDPO.

1. Data collection

- (a) (**General**) We collect your personal information either directly from you or indirectly as a result of your relationship with us from time to time.
- (b) (**Types of data to be collected**) The personal information that we collect and/or hold includes:
 - (i) information that you provide to us during the account opening process such as your personal details, contact information, correspondence address and communication records including but not limited to your inquiries and our responses (“**Personal Data**”); and
 - (ii) other information, where applicable, such as your IP address, web browser type, operating system and your internet service provider, which may also be collected indirectly from you during our ordinary course of business relationship with you, for example through online tracking or when you effect transactions with us.
- (c) (**Purpose of data collection**) We may use the information collected for the following purposes:
 - (i) verify your identity for account opening;
 - (ii) open or maintain an account, service or product to you;
 - (iii) conduct credit checks at account opening and regularly thereafter;
 - (iv) maintain your credit history for present and future reference;
 - (v) meet our internal operational requirements;
 - (vi) design our products and services for your use;
 - (vii) enforce our obligations, including collecting amounts outstanding from you;
 - (viii) carry out statistical and other analysis;
 - (ix) meet or comply with any obligations or requirements for disclosing and using data that apply to us or any of our affiliates in accordance with any present or future law, regulation or guideline issued by any legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations; and
 - (x) any other purposes related to any of the above purposes.

If you do not provide us with your personal information for these purposes, we may not be able to open an account or to provide any services or products to you. For details, please refer to the Personal Information Collection Statement, including the consequences of failure to provide such data.

2. Transfer of data

Data held by us relating to you will be kept confidential, but we may provide such data to the following parties, within or outside of Hong Kong, for the purposes set out in paragraph 1 above:

- (a) any affiliates of us;
- (b) any director, officer, employee or associated person of us or our affiliated companies only when carrying out their respective business activities;
- (c) any agent, contractor, liquidity provider or third-party service provider who provides administrative, telecommunications, computer, trading, settlement, payment or clearing, nominee, custodian, anti-money laundering or other services to us or our affiliated companies;
- (d) any bank or any trustee, registrar or custodian of any bank or custodian account in connection with the provision of any services to you by us or our affiliates;
- (e) any professional advisor, insurer or auditor of us or our affiliated companies;
- (f) any third party with which you have or propose to have dealings;
- (g) credit reference agencies and, in the event of default, debt collection agencies;
- (h) any actual or proposed person or legal entity to whom we transfer, assign or propose to transfer or assign all or part of our interest and/or obligations in respect of the account or any services provided to you;
- (i) any person to whom we transfer, assign or propose to transfer or assign our interests and/or obligations in respect of the account or any services provided to the client;
- (j) selected companies for the purpose of marketing services or products as described in paragraph 1 above; and
- (k) any person to whom we are required by law, regulation, court order or request from any governmental or regulatory body to provide such data.

3. Use of personal data in direct marketing

- (a) (**direct marketing**) We may use your 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.
- (b) (**opt out**) 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 in paragraph 8 below. 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.

4. Retention of data

We will retain your personal information to the maximum extent permissible under applicable law and will only keep such information for a period which is not longer than necessary and permitted by applicable law.

5. Security of data

We are committed to protecting the privacy, confidentiality and security of the personal information we hold by complying with the applicable law with respect to managing your personal information. We are equally committed to ensuring that all our employees and agents uphold these obligations. Our data protection policy includes:

- (a) 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 login;
- (b) our employees are required to maintain and protect the confidentiality of your personal information and must follow established procedures to do so; and
- (c) we limit access to your personal, financial and account information to those employees and employees of our affiliated companies 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, they will not have access to your password, as they are not saved in our systems.

6. Cookies policy

We use cookies and other technologies (“**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 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. In particular,

- (a) we may link the information we store in cookies in order to identify information you submit while on our website;
- (b) 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;
- (c) 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;
- (d) we may use third party software to track and analyse usage and volume information including page requests, form requests and click paths. The third party may use cookies to track your web browsing behaviour 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; and
- (e) 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.

7. Outsourcing Arrangement

If we engage outsourcing service providers or data processors (whether within or outside Hong Kong), outsourcing service providers or data processors are required to adhere to specific standards, including any standards prescribed by a privacy regulator, to prevent any loss, unauthorized access, use, modification or disclosure, either by contractual provisions or other means.

8. Your rights and contacting us

You have the following rights in accordance with the terms of the PDPO:

- (a) to check or enquire whether we hold your personal data and to access your data;
- (b) to require us to correct any of your personal data which is inaccurate;
- (c) to be informed of our policies and practices in relation to personal data and to be informed of the kind of personal data held by us and the main purposes for which data will be used; and
- (d) to request us to cease using your personal data for direct marketing purposes, by contacting our Data Protection Officer at:

**Data Protection Officer
PingPong Intelligence Limited
Unit 07, 12/F,
Emperor Group Centre,
No. 288 Hennessey Road,
Wan chai, Hong Kong**

Or

E-mail: DataProtection@apifx.com,

To the extent permitted by applicable law, we reserve the right to refuse unreasonable requests (for example, requests which infringe the privacy of others) according to the terms of the PDPO. We may charge a reasonable fee for the processing of any data access request.

9. Miscellaneous

- (a) **(no limitation of your rights)** Nothing in this Statement shall limit your rights under the PDPO.
- (b) **(change of this Statement)** 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.
- (c) **(English version prevails)** Should there be any inconsistencies between the English version and the Chinese version of this Statement, the English version shall prevail.