

PRIVACY POLICY

Personal Data Collection Statement

This statement is made in accordance with the Personal Data (Privacy) Ordinance, Chapter 486 of Hong Kong Law (“the Ordinance”) concerning the provision of personal data by clients to Herz Market Limited for the opening or maintenance of accounts for securities trading and related services. This statement supplements the Securities Cash Client Agreement and/or Securities Margin Client Agreement entered into between Herz Market Limited and the client.

Unless otherwise redefined in this statement or explicitly specified, terms defined in the Securities Cash Client Agreement and/or Securities Margin Client Agreement have the same meaning when used in this statement.

1. Purpose of Collection

Personal data provided by clients for opening or maintaining accounts with Herz Market Limited will be used for the following purposes:

1. Matters related to the application for the opening and maintenance of accounts, including but not limited to obtaining credit reports through credit agencies in Hong Kong and overseas, and reviewing credit or margin arrangements.
2. Buying, selling, investing, exchanging, acquiring, holding, disposing of, and generally conducting various securities transactions or related matters on behalf of the client.
3. Record-keeping to comply with laws, regulations, and codes of practice in Hong Kong regarding securities business and transactions; and to provide personal data as legally required or required by the Stock Exchange, the Securities and Futures Commission, or any other governmental or regulatory agencies.
4. Marketing of products and services that may interest the client.

2. Responsibility for Providing Personal Data

1. Clients are responsible for providing the required personal data to Herz Market Limited. Failure to provide such data may result in refusal of account opening or maintenance or related services.
2. Clients are obliged under the Ordinance to ensure that the personal data provided is accurate.

3. Disclosure of Personal Data

1. 3.1. Herz Market Limited may disclose client personal data to executives, employees, agents, contractors, service providers, or third parties involved in administrative, data processing, telecommunications, computer, financial, professional, custodial,

settlement, banking, printing, or other services related to Herz Market Limited's business operations as deemed necessary.

2. Disclosure may also be made to.
 - Comply with legal requirements or requests from the Securities and Futures Commission, the Stock Exchange, or any other governmental or regulatory agencies, whether or not legally enforceable.
 - Group companies, affiliates, agents, assignees or subcontractors of Herz Market Limited without assuming any liability for the consequences of such disclosures.
 - Assignees, transferees, participants, sub-participants, successors, or transferees related to the account.
 - Any financial institutions that have business dealings or propose to have business dealings with Herz Market Limited to provide services to clients.

4. Access to Personal Data

Clients may request access to and correction of incorrect personal data held by Herz Market Limited, in accordance with the Ordinance. A reasonable fee may be charged for handling such requests as per Section 28 of the Ordinance.

5. Direct Marketing

Herz Market Limited intends to use the client's personal data for direct marketing, and requires the client's consent for this purpose:

1. Data such as client names, addresses, email addresses, product and service portfolio, trading patterns and behavior, financial background, and demographic information may be used for direct marketing.
2. The types of services, products, and promotional goals may include:
 - Financial, insurance, investment, wealth and asset management, and related services and products;
 - Reward, loyalty, or incentive programs and related services and products.
3. These services and products may be offered by Herz Market Limited and/or the following:
 - Members of Herz Market Limited;
 - Third-party financial institutions, insurers, securities, commodity and investment service providers;
 - Third-party reward, loyalty or incentive program providers.
4. In addition to Herz Market Limited using the data for promoting the above services

and products, the data may be provided to any or all of the persons described in 5(c) for use in promoting these services, products, and promotional objectives, for which Herz Market Limited requires written consent from the client (including an indication of no objection).

If clients do not wish their data to be used or disclosed for the aforementioned direct marketing purposes, they must notify Herz Market Limited in writing to exercise this right.

Please note that the above translation is for reference purposes and may not capture the legal nuances of the original text.