

ET Trade Limited* ("ETT") wants to provide the best service possible to our clients.

One way that ETT does this is by using client information to provide ETT's clients with convenient access to the right products and services. ETT also recognizes that ETT's clients have important expectations regarding the use of that information.

Safeguarding client information is a matter that ETT takes seriously. That is why ETT has set forth the following principles to affirm ETT's long-standing commitment to confidentiality:

From time to time, it is necessary for clients who are individuals to supply ETT with data which are personal data ("Data") for the purposes of the Personal Data (Privacy) Ordinance (Cap. 486 of the laws of Hong Kong). The purposes for which Data (and other information) relating to clients may be used are as follows:

- the daily operation of the services and facilities provided to clients;
- conducting credit checks;
- assisting other institutions to conduct credit checks;
- ensuring clients' ongoing credit worthiness;
- determining the amount of indebtedness owed to or by clients;
- meeting the requirements to make disclosure under the requirements of any law or regulations; and
- any purposes relating to any of the foregoing.

Data (and other information) held by ETT relating to clients will be kept confidential but ETT may disclose, and it is a condition of ETT providing services, products and information to clients that each client consents to the disclosure of, all Data (and other information) to:

- any officer, employee, agent, contractor or third party who provides administrative, credit information, debt collection, telecommunications, computer, payment or other services to ETT in connection with the operation of their business;
- any financial institution with which the client has or proposes to have dealings;
- regulatory authorities and other relevant government bodies;
- any other person under a duty of confidentiality to ETT including a company within ETT which has undertaken to keep such information confidential;
- ETT shares information regarding clients among ETT only in accordance with strict internal security standards and confidentiality policies and with applicable law;
- ETT holds ETT's employees fully accountable for adhering to those standards, policies and laws;
- ETT does not share information about ETT's clients with other companies except in order to conduct ETT's business, comply with applicable law, protect against fraud or make available special offers of products and services that ETT feel may be of interest to ETT's clients;
- ETT may also provide information to regulatory authorities and law enforcement officials in accordance with applicable law; and
- ETT has established high standards for protecting information regarding ETT's clients from unauthorized alteration or destruction.

ETT may, in accordance with the Personal Data (Privacy) Ordinance and any other applicable law:

- A. match, compare or exchange any Data or other information provided by, or in respect of, a client with Data (or other information) held by ETT or any other person for the purpose of:

- i. credit checking;
 - ii. Data (and other information) verification; and
 - iii. otherwise producing or verifying Data (and other information) which may be used for the purpose of taking adverse action against the client or any other person at any time.
- B. transfer such Data (and other information) to any place outside Hong Kong (whether for the processing, holding or use of such Data (and other information) outside Hong Kong). Under and in accordance with the terms of the Personal Data (Privacy) Ordinance each client has a right to:
 - i. check whether ETT holds Data about the client and the right of access to such Data;
 - ii. require ETT to correct any Data relating to the client which is inaccurate;
 - iii. ascertain ETT's policies and practices in relation to Data and to be informed of the kind of personal data relating to the client held by ETT; and
 - iv. request ETT to cease using Data about the client for direct marketing purpose.

In accordance with the terms of the Personal Data (Privacy) Ordinance, ETT has the right to charge a reasonable fee for the processing of any Data access request. At ETT, information regarding ETT's clients are used solely in the legitimate conduct of ETT's business, to deliver superior service and to design products and special offers that demonstrate ETT's understanding of clients and client's needs. As ETT move forward in developing new products and services in an era of vast technological change, ETT will continue to maintain ETT's dedication to assuring that client information is properly used and appropriately safeguarded.

ETT may make changes to this Privacy Statement from time to time and such changes will be posted on our website. ETT may also decide, but is not obliged to notify its Users by email of significant changes.

交易通有限公司一直致力為客戶提供最佳之服務。

要達到此一目的，其中一個途徑就是利用客戶的資料，為客戶提供最方便的途徑，獲得合適的產品和服務，交易通有限公司亦明白到客戶對於其個人資料的使用非常關注。保護客戶資料乃是交易通有限公司一直認真處理的事項。

因此，交易通有限公司訂立了以下守則，矢志承諾對客戶的資料保密：

無論任何時候，個人名義的客戶均需要向交易通有限公司提供個人資料(「資料」)，以作個人資料(私隱)條例(《香港法例》第 486 章)下之用途。有關客戶的資料(或其它資料)可能用於以下用途：

- 向客戶提供之服務及設施之日常運作；
- 進行信貸審查；
- 協助其它機構進行信貸審查；
- 確保客戶的信用維持良好；
- 厘定拖欠客戶或客戶拖欠之債務金額；
- 根據任何法例或規例之規定，符合作出披露之要求；及
- 與任何前述部份有關之任何用途。

交易通有限公司持有之客戶有關的資料(及其它資料)將會保密，但交易通有限公司可向以下人士披露所有資料(及其它資料)，而客戶同意披露所有資料(及其它資料)亦是交易通有限公司向客戶提供服務、產品及資料之條件：

- 任何向交易通有限公司提供有關其業務運作之行政、信貸資料、債務追討、電訊、電腦、繳款或其它服務之高級職員、僱員、代理、承包商或第三者；
- 客戶已有或擬與之進行交易之任何金融機構；
- 監管當局及其它有關政府機構；
- 任何有責任為交易通有限公司保密之其它人士，包括交易通有限公司以內承諾保持此等資料機密之公司；
- 交易通有限公司系內公司之間對客戶之資料使用，須依據嚴格之內部安全標準、保密政策及適用法律；
- 交易通有限公司約束僱員完全遵守該等標準、政策及法律；
- 除為了進行業務、遵守適用法律、保護免受欺詐或作出交易通有限公司認為可能符合客戶利益之產品及服務優惠外，交易通有限公司不會將有關客戶的資料分發予其它公司；
- 交易通有限公司亦可依據適用法律向監管當局及執法人員提供資料；及
- 交易通有限公司訂立了極高標準，以保護客戶的資料免受未經授權之更改或破壞。

交易通有限公司可依據個人資料(私隱)條例及其它適用法律進行以下活動：

- 甲、將客戶提供或有關客戶之任何資料或其它資料，與交易通有限公司或任何其它人士持有之資料(或其它資料)進行配對、比較或交換，以作以下用途：
 - i. 信貸審查；
 - ii. 資料(或其它資料)核對；及
 - iii. 提出或核對資料(或其它資料)，該等資料可能用於在任何時候採取對客戶或任何其它人士不利的行動。
- 乙、將此等資料(或其它資料)轉往香港以外任何地方(不論在香港以外處理、持有或使用此等資料(或其它資料))。

根據及依據個人資料(私隱)條例之條款，每位元客戶均有權：

 - i. 檢查交易通有限公司是否持有有關客戶之資料，及是否有權使用此等資料；
 - ii. 要求交易通有限公司更改有關客戶之任何錯誤資料；
 - iii. 確定交易通有限公司有關資料之政策及做法，以及獲知交易通有限公司持有有關客戶之個人資料種類；及
 - iv. 要求交易通有限公司停止使用有關客戶之個人資料作為直接推廣之用途。

依據個人資料(私隱)條例之條款，交易通有限公司有權就處理任何資料索取查閱之申請收取合理費用。在交易通有限公司有關客戶之資料只會用於進行本身業務的合法用途，以提供優質服務，及進行產品設計及優惠，從而顯示交易通有限公司明白客戶及其需要。隨著交易通有限公司會在新科技年代進一步發展新產品和服務，交易通有限公司會繼續竭力確保客戶的資料會被正確使用及受到適當保護。

交易通有限公司可以不時更改本私隱聲明，並於本公司網站張貼有關變動。交易通有限公司亦可決定（但並無義務）將任何重大變動以電郵通知其用戶。