

BPI Wealth Hong Kong Limited

Personal Information Collection Statement (the “Statement”)

1. Introduction

BPI Wealth Hong Kong Limited, or any of its affiliates (“BPI Wealth HK”, “us” or “we”) process information and personal data relating to you and/or any Related Person of yours [Related Person(s) and you together: the “**Data Subject(s)**”]. We do this in connection with our existing and/or prospective business relationships, including your use of our websites (together: the “**Business Relationship**”). We can do so as controller (the “**Controller**”).

A “**Related Person**” means an individual or entity whose information that you or a third party provides to us and/or information that otherwise comes to our knowledge in connection with our Business Relationship. A Related Person may include, but is not limited to, (i) a director, officer or employee of a company; (ii) a trustee, settlor or protector of a trust; (iii) a nominee or beneficial owner of an account; (iv) a substantial interest owner in an account; (v) a controlling person; (vi) a payee of a designated payment; (vii) a representative or agent (i.e. with a power of attorney, a right to information on an account); or (viii) an employer or contractor.

2. Notice Relating to the Personal Data (Privacy) Ordinance

The purpose of this Statement is to set out the policies and practices of BPI Wealth HK and our commitment to protect personal data privacy in accordance with the Personal Data (Privacy) Ordinance (Cap. 486) of Hong Kong (“PDPO”).

This Statement explains why personal data is collected, how personal data will be used, to whom it may be disclosed, and how data subjects may exercise their rights in relation to their personal data.

3. Personal Data Requested, Collected and Held by BPI Wealth HK

We are subject to certain confidentiality and/or secrecy obligations, e.g. those arising under laws governing data protection, contracts and professional or banking secrecy, whichever may be applicable.

This Statement deals with the way we process personal data. That means how we collect, use, store, transmit or otherwise handle or process, operations collectively defined in this document as “**Processing**” or “**Processing Operations**”. This Statement does not replace, and remains subject to, our applicable contractual terms and conditions.

We may conduct our Processing Operations either directly or indirectly, through other parties that process personal data on our behalf (the “**Processors**”).

Personal data include any information relating to an identified or identifiable natural person or as defined in the PDPO. The PDPO defines “personal data” as any data that (i) relates directly or indirectly to a living individual; (ii) is practicable to ascertain the identity of the individual; and (iii) is in a form in which access to or processing of the data is practicable. For the purposes of this Statement, the term “personal data” which is referred to here shall bear the same meaning as defined in the PDPO.

Personal data of Data Subjects that we process may be based on the following principal legal bases.

On the legal basis of contract performance, including the pre-contractual steps:

- identification data, e.g. names, addresses, telephone numbers, email addresses, business contact information;
- personal characteristics, e.g. date of birth, country of birth;
- work-related information, e.g. employment and job history, title, professional skills, powers of attorney;
- financial information, e.g. financial and credit history information, bank details, records from the debt collection enforcement office; and/or
- transaction/investment data, e.g. current and past investments, investment profile, investment preferences and invested amount, number and value of shares held, role in a transaction (seller/acquirer of shares), transaction details.

On the legal basis of legal and regulatory obligations:

- identifiers issued by public bodies, e.g. passport, identification card, tax identification number, national insurance number, social security number, work permit;
- reputation checks and background checks; and/or

- voice recording, e.g. the recording of phone calls made by or to the Controller's representatives.

On the legal basis of our legitimate interest:

- management and security data, e.g. records of presence on our premises; and/or
- certain cookie information. When Data Subjects visit BPI Wealth HK's website, cookies will be stored in their device. "Cookies" are small-text files retrieved by the site, as part of BPI Wealth HK's interaction with the browser. We use "cookies" to capture the information of web pages visited, session identifiers and language preferences while no personal information is captured in the cookies. The information gathered by cookies may be used for session management, storing user preferences and tracking of web traffic statistics in which web visitors have visited and are interested in. Most web browsers are initially set up to accept cookies. Data Subjects can choose to "not accept" by changing the settings on their web browsers. If clients disable cookies in their web browsers, they may not be able to access some of the site functions. No personally identifiable information will be transferred to a third party.

4. Use of Personal Data

Purposes for which we process personal data (the "**Purposes**") may be based on the following principal legal bases, bearing in mind that they may also rely cumulatively on other mentioned legal bases.

We collect and process personal data as necessary for pre-contractual steps and performance of a contract to which you are a party and/or a Related Person is related, which encompasses the following Processing Operations:

- the opening and management of your and/or a Related Person's account or Business Relationship with us, including all related operations for your identification;
- any other related services provided by any service provider of the Controller(s) and Processors in connection with our Business Relationship;
- management, administration and distribution of investment funds, including any ancillary services related to these activities, or the processing of subscription, conversion and redemption requests in investment funds, as well as for maintaining the ongoing relationship with respect to holdings in such investment funds; and/or
- management of due diligence, and management of the Business Relationship and related communication with you.

We also collect and process personal data relating to compliance with legal and regulatory obligations to which we are subject, including but not limited to:

- providing offering documentation to Data Subjects about products and services;
- complying with legal obligations relating to accounting, compliance with legislation on markets in financial instruments, outsourcing and foreign activity;
- conducting audits and/or regular reviews on you or your Related Person;
- carrying out any other form of cooperation with, or reporting to, competent administrations, supervising authorities, law enforcement authorities and other public authorities [e.g. in the field of anti-money laundering and combating terrorism financing ("AML-CTF")], for the prevention and detection of crime under tax law [e.g. reporting of name, address, date of birth, tax identification number, account number and account balance to tax authorities under the Common Reporting Standard or Foreign Account Tax Compliance Act or other tax legislation to prevent tax evasion and fraud as applicable];
- preventing fraud, bribery, corruption and the provision of financial and other services to persons subject to economic or trade sanctions on an ongoing basis in accordance with our AML-CTF procedures, as well as to retain AML-CTF and other required records for screening purposes;
- dealing with active risk management pursuant to which risks in terms of markets, credit, default, processes, liquidity as well as operational and legal risks must be identified, limited and monitored; and/or
- recording conversations with Data Subjects on a cloud-based solution (such as telephone and electronic communications), in particular to document and verify instructions, detect potential or actual frauds and other offences.

Furthermore, we may process personal data in connection with legitimate interests we pursue so that we can:

- develop our Business Relationship with you;
- improve the quality of our services and our internal business organization and operations, including for risk assessment and to take risk management-related business decisions;
- use this information in BPI Wealth HK for market studies or advertising purposes, unless Data Subjects have objected to use of their personal data for marketing;
- communicate personal data to other affiliates, in particular to guarantee an efficient and harmonized service and inform Data Subjects about services offered by affiliates; and/or

- establish, exercise and/or defend actual or potential legal claims, investigations or similar proceedings.

If our personal data processes presuppose that you give your prior consent to doing so, we will seek your consent in due time and you will have the right to withdraw your consent at any time by contacting your relationship manager or our Data Protection Officer (see Section 10 below).

The provision of personal data may be mandatory, e.g. with regard to our compliance with legal and regulatory obligations to which we are subject. Please be aware that failing to provide such information may preclude us from pursuing a Business Relationship with, and/or from rendering our services to, you.

5. Collection of Personal Data

To achieve the Purposes, we collect or receive personal data:

- directly from the Data Subjects, e.g. when they contact us or through (pre)-contractual documentation sent directly to us; and/or
- indirectly from other external sources, including any publicly available sources [e.g. UN or EU sanctions lists, OFAC – Specially Designated Nationals lists, Official Receiver’s Office Search Reports], information available through subscription services (e.g. Bloomberg, Dow Jones Sanctions Lists) or information provided by other third parties.

6. Security of Personal Data

We are committed to protecting personal data by restricting access to authorized personnel on a need-to-know basis, providing secure data storage facilities and incorporating security measures into equipment in which data is held. Encryption technology is employed for sensitive data transmission. If we engage data processors to handle or process personal data on our behalf (whether within or outside Hong Kong), we will adopt contractual or other means to prevent unauthorized or accidental access, processing, erasure, loss or use of the data transferred to the data processors for processing.

7. Retention of Personal Data

In principle, we retain personal data for as long as we need to do so to achieve the Purposes. We will delete personal data (or equivalent) once they are no longer necessary to achieve the Purposes, subject however: (i) to any applicable legal or regulatory requirements to store personal data for a longer period; or (ii) to establishing, exercising and/or defending actual or potential legal claims, investigations or similar proceedings, including legal holds. We may enforce any or all of the above-mentioned under points (i) and (ii) to preserve relevant information.

8. Disclosure of Personal Data

We reserve the right to disclose or make accessible the personal data to the following recipients, provided this is legally or otherwise authorized or required:

- public/governmental administrations, courts, competent authorities (e.g. financial supervisory authorities) or financial market actors (e.g. third-party or central depositories, brokers, exchanges and registers);
- the Bank of the Philippine Islands (“BPI Group”) or third parties that may process personal data. In such cases, limited personal data may be used by the recipients independently for their own purposes in compliance with their applicable laws; and/or
- auditors or legal advisors.

We undertake not to transfer personal data to any third parties other than those listed above, except as disclosed to Data Subjects from time to time or if required by applicable laws and regulations applicable to them or by any order from a court, governmental, supervisory or regulatory body, including tax authorities.

In the course of our Business Relationship, we may disclose, transfer and/or store personal data abroad (“**International Transfer**”): (i) in connection with the conclusion or performance of contracts directly or indirectly related to our Business Relationship, e.g. a contract with you or with third parties in your interest; or (ii) in exceptional cases duly provided for by applicable laws (e.g. disclosures of certain trades made on an exchange to international trade registers).

International Transfer may include the transfer to jurisdictions that: (i) ensure an adequate level of data protection for the rights and freedoms of Data Subjects as regards Processing; or (ii) benefit from adequacy decisions as regards their level of data protection (e.g. court judgments relating to the PDPO).

9. Your Rights in Connection with Data Protection

Subject to the limitations set forth in this Statement and/or in applicable local data protection laws, you can exercise the rights below by contacting the Data Protection Officer (see Section 10 below):

- to check whether we hold personal data about you and to access such data;
- to require us to correct any personal data relating to you which is inaccurate; and/or
- to ascertain our policies and practices in relation to data and to be informed of the kind of personal data held by us.

In accordance with the PDPO, we reserve the right to charge a reasonable fee for the administrative costs of complying with such request, particularly if such request is manifestly unfounded, excessive, or repetitive.

If a Data Subject objects to the Processing of personal data, we are nevertheless allowed to continue with the Processing if it is: (i) legally mandatory; (ii) necessary for the performance of a contract to which the Data Subject is a party; or (iii) necessary for the purposes of the legitimate interests we pursue, including the establishment, exercise or defence of legal claims. We will not, however, use the Data Subject's personal data for direct marketing purposes if the Data Subject asks us not to do so.

10. Contact Details of Data Protection Officer

If you have any questions about this Statement, about your Controller or, more generally, about the processing of your (or your Related Persons') personal data, you can contact your relationship manager or our Data Protection Officer at the following addresses:

Title: Data Protection Officer

Address: 5/F, LHT Tower, 31 Queen's Road Central, Hong Kong

Email: BPI-Wealth-HK-Compliance@bpi.com.hk