

# PRIVACY POLICY

Aeneas Capital and/or its affiliates. strives to safeguard and keep confidential any information relating to our private clients or their financial situations.

The following Personal Data Privacy Statement is issued pursuant to the Personal Data (Privacy) Ordinance of Hong Kong (“Ordinance”) in connection with your provision of personal data or information (“Data”) to Aeneas Capital.

## Personal Data Collection

From time to time, it is necessary for you to supply Aeneas Capital with Data in connection with various matters such as financial needs analysis, account opening or provision of services to you or compliance with any laws or guidelines issued by regulatory or other authorities.

The Data may be collected include, but not limited to, name, occupation, contact details, date of birth, nationality, passport or identity card numbers, details of family members, financial status and investment history.

Failure to supply such Data may result in Aeneas Capital being unable to provide services to you or unable to comply with any laws or regulations or guidelines and codes issued by regulatory or other authorities.

## Purpose and Use:

Aeneas Capital intends to use your Data for any or all of the following purposes:

- The processing of a financial needs analysis or an application to be a private client of Aeneas Capital;
- The regular operation of your account and the services to be provided to you;
- Meeting the disclosure and compliance requirements under any laws or regulations or internal Aeneas Capital compliance policies applicable to Aeneas Capital in Hong Kong or elsewhere;
- Promoting and direct marketing of the marketing services and products;
- Any other purpose directly related to the above.
- You have the right to object to the use of your Data for direct marketing purposes as set out in paragraph 1(d) above. Aeneas Capital will cease to use your Data for direct marketing purposes without charge to you upon receiving your request.

## **Retention and Access:**

The Data collected may be maintained for a period of time as required under applicable law and as otherwise needed to fulfil the purposes set out above.

Aeneas Capital will take all reasonable measures to ensure that Data is kept confidential and secure against unauthorized access, loss or disclosure. Aeneas Capital may provide such information to the following parties, whether inside or outside of Hong Kong, for the purposes set out in the “Purpose and Use” section above:

- The parent company of Aeneas Capital, its subsidiaries and associated companies;
- The service providers of Aeneas Capital including the trustee, investment manager, custodian and the auditor of Aeneas Capital;
- The third party service providers who provide insurance, banking, provident fund or scheme, mortgages, financial and investment services, securities and other related products and services to Aeneas Capital in connection with the operation of its business;
- Any agent, contractor or third party service providers who provide administrative, design, seminars or events, reward or loyalty programs, referral business partners or other services to Aeneas Capital in connection with the operation of its business;
- The employees, officers, directors of Aeneas Capital;
- Any party (including governmental or regulatory authority) entitled by law or regulation or in response to a regulatory request; and
- External service providers of Aeneas Capital (including but not limited to printing houses, mailing houses, digital or telecommunication companies, data processing companies, storage companies, and information technology companies) that Aeneas Capital engages for the purposes set out in paragraph 1(d) in the “Purpose and Use” section above.

## **Your Right**

Under the Ordinance, you have the right to:

- Check whether Aeneas Capital holds Data relating to you, and access to such Data;
- Require Aeneas Capital to correct any Data relating to you which is inaccurate;
- Object to the use of your Data for direct marketing purposes and after you communicate your objection to Aeneas Capital, Aeneas Capital shall not use your Data for future direct marketing activities.

Please note that a reasonable fee may be charged to you to cover Aeneas Capital’s administrative and actual costs incurred in complying with your data access request.

For enquires in connection with your Data held by Aeneas Capital or objection to use of your Data for direct marketing purposes, please contact:

Data Privacy Officer

Aeneas Capital Limited

17/F, Guangdong Investment Tower,

148 Connaught Road Central, Hong Kong