



## PERSONAL INFORMATION COLLECTION STATEMENT

The Customer (“Customer” or “you”) acknowledges that the following information is provided to it by BTIG Hong Kong Limited (“BTIGHK”, “we”, “our”) in accordance with the requirements of the Hong Kong Personal Data (Privacy) Ordinance (the “Ordinance”). Capitalized terms used herein and not otherwise defined will have the meanings given to them in the Asia Pacific Terms and Conditions.

### 1. DISCLOSURE OBLIGATION

This Personal Information Collection Statement (“PICS”) is made in accordance with the guidelines issued by the Privacy Commissioner for Personal Data. The PICS sets out: (i) the purposes for which your Personal Data (as defined in the Ordinance) will be used following collection, (ii) what you are agreeing to with respect to BTIGHK’s use of your Personal Data, and (iii) your rights under the Ordinance.

We do not sell your personal information to third parties for profit and commit to use your personal information according to this privacy statement.

We may provide your personal information to other affiliates of BTIG Group and clearing agents in order to facilitate your transactions.

We may provide your personal information to other affiliates of BTIG Group or to third parties in the course of providing services to you pursuant to our Terms of Business and/or our business relationship with you.

All of these disclosures may involve the transfer of personal information to countries or regions without data protection rules similar to those in effect in your area of residence.

Personal information may also be disclosed to law enforcement, regulatory, or other government agencies, or to other third parties, in each case to comply with legal or regulatory obligations or other requests.

### 2. INFORMATION WE COLLECT

We collect information about you to help us provide services to you, offer new products or services, and fulfill legal and/or regulatory requirements. The types of information we collect may include:

- Information you provide through our sites or as part of the new account opening process.

This includes information we receive from you on account opening applications or other forms, for example, your name, email, personal or business street address, passport, assets and income. This also includes information you post or publish through our sites including, for example, customer organization details and customer employee contact information. We use this information in order to open your account, for AML checks, to provide you with services, for our research purposes and in connection with our general sales practices to notify you of opportunities.

- Information about your transactions with us or others.

This includes your transaction history, account balance, payment history, and parties to transactions. We use this information to provide you with the requested service to complete the transaction, to comply with our legal responsibilities and to manage the interactions between BTIG and you.

- Information you provide regarding marketing data preferences.

We use this information in connection with our client support and to improve our offering of services to you.

- Information that we may receive from a consumer reporting agency.

This includes information such as your credit worthiness and credit history. We use this information in connection with providing you with credit information and extending credit to you.

### 3. DISCLOSURE OF PERSONAL DATA

The Customer acknowledges that Personal Data concerning the Customer (whether provided by BTIGHK or any other person, and whether provided before or after the date BTIGHK receives the Customer onboarding forms containing this information) may be disclosed to the following companies or persons (each, a “User”):



- a) BTIGHK and/or any subsidiary or affiliate of BTIGHK (collectively, “BTIG”);
- b) Any director, officer or employee of BTIG only when carrying out the business of BTIG;
- c) Any third party service providers (e.g. lawyers, advisers, brokers, etc.) or agents authorized by BTIG to assist with carrying out the business of BTIG; and/or
- d) Any prospective buyer or third party that acquires all or substantially all of us or our business as part of a sale, transfer, merger, acquisition or re-organisation.

#### **4. PURPOSE**

The Customer acknowledges that all Personal Data concerning it (whether provided by the Customer or any other person and whether provided before or after the date BTIGHK receives the Customer onboarding forms containing this information) may be used by any User for the following purposes:

- a) New or existing client verification procedures;
- b) Managing your relationship with us and/or administration of your account with us;
- c) Marketing a BTIG product to the Customer;
- d) Management and operation of the services we provide to you, and conducting credit checks, screenings, due diligence checks or ongoing monitoring as may be required under applicable law, regulation, directive or internal policies;
- e) Any purpose relating to or in connection with compliance with any law, regulation, court order, order or request of a governmental, administrative, or regulatory body, or sanction;
- f) Carrying out our obligations under the Asia Pacific Terms and Conditions with the Customer;
- g) Responding to or investigating any complaints, claims, or disputes;
- h) Complying with any obligations, requirements, policies, procedures, measures or arrangements for sharing data and information within BTIG;
- i) Prevention or detection of money laundering, terrorist financing or other unlawful activities;
- j) Recovering a debt; and/or
- k) Pursuing legal proceedings.

#### **5. TRANSFER OF PERSONAL DATA OVERSEAS**

Transfers of Personal Data to any place outside Hong Kong shall still be subjected to and protected in accordance with Hong Kong laws (i.e. not a lower standard). If we do transfer your Personal Data to countries outside of Hong Kong, we will take steps to ensure that your Personal Data continues to receive a standard of protection that is at least comparable to that provided under the Ordinance.

#### **6. RIGHTS OF ACCESS AND CORRECTION**

The Customer has the right to have access to and correction of the Customer’s Personal Data as set out in the Ordinance. In general, and subject to certain exemptions, the Customer is entitled to:

- 6.1 Enquire whether BTIGHK holds Personal Data in relation to the Customer;
- 6.2 Request access to the Customer’s Personal Data within a reasonable time, in a reasonable manner and in a form that is intelligible;
- 6.3 Request the correction of the Customer’s Personal Data; and
- 6.4 Be given reasons if a request for access or correction is refused, and object to any such refusal.

The Customer acknowledges that should BTIGHK incur costs in providing such access, BTIGHK is entitled to charge a reasonable fee for such access provided such fees are agreed upon in advance and in writing by the customer.



**7. RETENTION**

Personal Data provided to BTIGHK will be retained for such period as may be necessary for the proper discharge of BTIGHK's functions or as required or permitted by applicable laws.

**8. CHANGES TO OUR PRIVACY STATEMENT**

We may modify or amend this PICS from time to time at our discretion. We encourage you to periodically review this PICS to be informed about how we are protecting your information.

**9. CONTACT PERSON**

If the Customer wishes to request access to and/or correction of Personal Data connected to the Customer, the Customer should address its request to the Head of Administration at BTIGHK at [BTIGHKAdmin@btig.com.hk](mailto:BTIGHKAdmin@btig.com.hk).