

## PRIVACY POLICY

### INTRODUCTION

With offices in Hong Kong and London, China Post Global is a SFC and FCA licensed investment manager with unique insight into the capital markets of mainland China, providing portfolio management and asset allocation solutions for investors worldwide.

As used throughout this policy, the term “China Post Global” (“We”, “Our” and “Us”) refers to China Post Global Limited and its affiliates worldwide.

### CONTACT DETAILS

China Post Global (Hong Kong):

China Post Global Limited

60 Wyndham Street | Suite 1901 | Central

Central Hong Kong

Phone: +852 3468 5355

Email: [contact@chinapostglobal.com](mailto:contact@chinapostglobal.com)

China Post Global (UK):

China Post Global

75 King William Street

London | WC4N 7BE

Phone: +44 203 617 5260

Email: [marketaccess@chinapostglobal.co.uk](mailto:marketaccess@chinapostglobal.co.uk)

### PERSONAL DATA

During the course of business, China Post Global may obtain personal information about you. Obtaining this information is important to our ability to deliver the highest level of service to you, but we also recognise that you expect us to treat this information appropriately.

We have developed this Privacy Policy (“Policy”) because we want you to feel confident about the privacy and the security of your personal information. This Policy describes:

- The types of personal information that we may collect about you
- How we collect your personal information
- The purposes for which we use the information
- The circumstances in which we may share the information
- The steps that we take to safeguard the information to protect your privacy
- How long we keep your personal information
- Your rights regarding your personal information

If you have any questions, comments or complaints about this Policy, or the general use of your information, you can contact us using the details listed above. You also have the right to make a complaint to the relevant Supervisory Authority about our use of your information (in most cases under this Policy the relevant Supervisory Authority will be the UK’s Information Commissioner’s Office (“ICO”)). The ICO can be contacted at <https://ico.org.uk> or telephone on 0303 123 1113.

This Policy may change from time to time and, if it does, the up-to-date version will always be available on our Website. Please note that by continuing to use our Website you are agreeing to any updated versions.

### TYPES AND SOURCES OF PERSONAL DATA

The personal information we collect about you comes primarily from the account applications or other forms and materials you submit to China Post Global during the course of your relationship with us. We may also collect information about your transactions and experiences with China Post Global relating to the products and services China Post Global provides.

**Information you provide us:**

You may choose to provide us with personal data when you are introduced to us, when we meet you in person, or when we are in contact by phone, email, via our website or otherwise. The categories of personal data that you would typically provide includes:

- First and last name
- Job title and company name
- Email address
- Phone number
- Postal address
- Employment history

**Information we collect from third parties:**

We collect most of this information from you directly. However, we also collect information about you:

- From publicly accessible sources, e.g. Companies House
- From third party sources of information, e.g. client due diligence providers
- Which you have made public on websites associated with you or your company or on social media platforms such as LinkedIn
- From a third party, e.g. a person who has introduced you to us or other professionals you may engage

**Information we collect online:**

We, or our service providers, collect, store and use information about your visits to our website and about your computer, tablet, mobile or other device through which you access our website. This includes the following:

- Technical information, including the Internet protocol (IP) address, browser type, internet service provider, device identifier, your login information, time zone setting, browser plug-in types and versions, operating system and platform, and geographical location
- Information about your visits and use of the Site, including the full Uniform Resource Locators (URL), clickstream to, through and from our Site, pages you viewed and searched for, page response times, length of visits to certain pages, referral source/exit pages, page interaction information (such as scrolling, clicks and mouse-overs), and website navigation and search terms used
- Information collected by cookies on our website. "Cookies" are small text files that may be placed on your Web browser when you visit our Web sites or when you view advertisements we have placed on other Web sites. If you would like to opt out of cookies, you can change the settings on your internet browser to reject cookies. For more information please consult the "Help" section of your browser or visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org). Please note that if you do set your browser to reject cookies, you may not be able to use all of the features of our Website

**Sensitive personal data:**

We do not seek to collect sensitive (or special categories of) personal data. Sensitive personal data is defined by data protection laws to include personal data revealing a person's racial or ethnic origin, political opinion, religion or beliefs, trade union membership, genetic or health status, sexual orientation, or any criminal convictions, offences or related security measures. If we do collect any such sensitive personal data, we will ask for your explicit consent to our proposed use of that information at the time of collection.

**OUR USE OF YOUR PERSONAL INFORMATION**

The purpose for which we use and process your information (excluding sensitive personal data) and the legal basis on which we process your personal data is explained below.

We use information held about you in the following ways:

- To provide you with information and services that you request from us
- To process your application to use our services
- To undertake checks such as identification verification checks with fraud prevention agencies to enable us to comply with our anti-money laundering obligations and for the purposes of crime prevention and fraud prevention
- To comply with our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us
- To help protect your information and prevent unauthorised access to it
- To deal with any queries, complaints or problems reported by you
- To generate statistics relating to the use of our website, such as the popularity of certain features or services. We do not use personally identifiable information for these purposes
- To send you information regarding changes to our policies, other terms and conditions and other administrative information
- To provide you with information about other services we offer that are similar to those that you have already engaged us to provide, or enquired about. You may opt out of receiving this information when we collect your details or at any time by contacting us using the contact details above
- To send you marketing material related to financial products that you would reasonably expect to receive given the nature of business
- If required to do so by law and to the extent necessary for the proper operation of our systems, to protect us/our customers, or for the enforcement of any agreement between you and us
- To notify you of changes to our services
- To help improve the services we provide to you

Unless otherwise stated in this Policy, the legal bases for our use of your personal data will be either because (1) you have consented to us doing so, or (2) it is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract, (3) it is necessary for us to use it so that we can comply with applicable regulatory, judicial or other legal obligations, or (4) it is necessary for us to fulfill our legitimate business interests. Where we rely on legitimate interests as a lawful basis, we will carry out a balancing test to ensure that your interests, rights and freedoms do not override our legitimate interests. If you want further information on the balancing test we have carried out, you can request this from China Post Global.

If you do not wish to provide us with your personal data and processing such information is necessary for the performance of a contract with you, we may not be able to perform our obligations under the contract between us.

You have the right to opt out of receiving email marketing communications from us at any time by contacting China Post Global using the contact details set out above. All our email marketing communications also include an 'unsubscribe' function and a web link to this Policy for your ease of use.

China Post Global will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you in a timely manner and we will explain the legal basis which allows us to do so.

## **DISCLOSURES OF YOUR PERSONAL INFORMATION**

We do not share your personal data with third parties except as provided in this Policy. China Post Global will not sell your personal information.

In order to provide efficient and reliable services and to improve product and service options available to you, more than one entity within China Post Global may be given, or given access to, your personal information. For example, one China Post Global entity might share your information with another in order to facilitate settlement of your transactions, which may be transferred internationally. When so sharing your personal information, we adhere to applicable legal and industry standards regarding the protection of personal information. Additional information on

how your personal information is protected while within China Post Global is provided below, under Information Security: How We Protect Your Privacy.

Disclosures of your personal data may include sharing such information internally as well as disclosing it to third parties, as described in the following two sections, respectively; Contact you or, if applicable, your designated representative(s) by post, telephone, electronic mail, facsimile, etc., in connection with your relationship and/or account; Provide you with information (such as investment research, statistics, comparative data) or general product information concerning products and services offered by China Post Global; and Facilitate our internal business operations, including assessing and managing risk and fulfilling our legal and regulatory requirements.

In addition, China Post Global may disclose information about you in the following circumstances:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets
- If all (or substantially all) of China Post Global's assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets
- If we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation
- If necessary to protect the vital interests of a person
- To enforce or apply our terms and conditions or to establish, exercise or defend the rights of China Post Global, our staff, customers or others

If your relationship with China Post Global ends, China Post Global will continue to treat your personal information, to the extent we retain it, as described in this Policy.

## **INFORMATION SECURITY: HOW WE PROTECT YOUR PRIVACY**

China Post Global is committed to protecting your privacy and maintaining the confidentiality and security of your personal information. We limit access to your personal information to authorised China Post Global employees or agents and, as described above in Disclosures of Your Personal Information, we ensure that our service providers are held to stringent standards of privacy.

We use industry standard physical and procedural security measures to protect information from the point of collection to the point of destruction. This includes (where applicable), encryption, firewalls, access controls, policies and other procedures to protect information from unauthorised access.

Where data processing is carried out on our behalf by a third party, we take steps to ensure that appropriate security measures are in place to prevent unauthorised disclosure of personal data.

Despite these precautions, however, China Post Global cannot guarantee the security of information transmitted over the Internet or that unauthorised persons will not obtain access to personal data. In the event of a data breach, China Post Global have put in place procedures to deal with any suspected breach and will notify you and any applicable regulator of a breach where required to do so.

## **HOW LONG WE KEEP YOUR PERSONAL INFORMATION**

China Post Global retains personal information for as long as necessary to provide our services to you, to fulfil the purposes described in this Policy and/or our business purposes, or as required by law or regulation.

## **YOUR RIGHTS**

You are entitled to access any personal data about you held by China Post Global by sending a written request to the details listed above. You may be required to supply a valid means of identification as a security precaution to assist us in preventing the unauthorised disclosure of your personal information. We will process your request within the time provided by applicable law.

In certain circumstances, you are entitled to receive your personal data, which you have provided to us, in a structured, commonly-used and machine-readable format and the right to transmit that data to another data controller without hindrance, or to have that personal data transmitted to another data controller, where technically feasible.

We want to make sure that your personal data is accurate and up to date. You have the right to have inaccurate personal data rectified, or completed if it is incomplete. You can update your details or change your privacy preferences by contacting us using the contact details listed above.

In certain circumstances, you have the right to:

- Request the erasure of your personal data erasure (“right to be forgotten”)
- Restrict the processing of your personal data to processing in certain circumstances

Please note that the above rights are not absolute and we may be entitled to refuse requests, wholly or partly, where exceptions under the applicable law apply. We may refuse a request for erasure, for example, where the processing is necessary to comply with our legal and regulatory obligations on record keeping. We may refuse to comply with a request for rectification or restriction if the request is manifestly unfounded or excessive or repetitive.

China Post Global may occasionally contact you by post, telephone, electronic mail, facsimile, etc., with details of products and services that we believe may be of interest to you. If you do not wish to be contacted in this way, if you wish to exercise your rights of correction and access, if you wish to make a complaint, or if you require further information regarding our Policy, please use the contact details listed above.

This Policy complies with the EU General Data Protection Regulation (“GDPR”) regarding privacy. You may have additional rights under other foreign or domestic privacy laws in addition to those that are described above. If you have any questions about this Policy, please contact us using the contact details listed above.

Updated and effective as of 24<sup>th</sup> May 2018