



E Fund Management (HK) Co., Limited

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Privacy Policy

1. This Policy

This Policy is issued by E Fund Management (Hong Kong) Co., Limited on behalf of itself, its subsidiaries and its affiliates, identified as Controllers in the table in Section 13 below (together, “E Fund Management (Hong Kong) Co., Limited”, “we”, “us” or “our”) and is addressed to individuals outside our organization with whom we interact, including visitors to our websites (our “Sites”), customers, Personnel of corporate customers, investors and vendors, and other recipients of our services (together, “you”). Defined terms used in this Policy are explained in Section 14 below.

This Policy may be amended or updated from time to time to reflect changes in our practices with respect to the Processing of Personal Data, or changes in applicable law. We encourage you to read this Policy carefully, and to regularly check this page to review any changes we might make in accordance with the terms of this Policy.

2. Processing your Personal Data

Collection of Personal Data: We collect Personal Data about you, subject to applicable law, from a variety of sources as follows:

- We obtain your Personal Data when you provide it to us (e.g., where you contact us via email or telephone, or by any other means).
- We collect your Personal Data in the ordinary course of our relationship with you (e.g., in the course of managing your transactions or your investment in our funds).
- We collect Personal Data that you manifestly choose to make public, including via social media (e.g., we may collect information from your social media profile(s), to the extent that you choose to make your profile publicly visible).
- We receive your Personal Data from third parties who provide it to us (e.g., your employer; our customers; credit reference agencies; law enforcement authorities; etc.).
- We receive your Personal Data from third parties, where you purchase any of our products or services through such third parties.
- We collect or obtain Personal Data when you visit any of our Sites or use any features or resources available on or through a Site. When you visit a Site, your device and browser may automatically disclose certain information (such as device type, operating system, browser type, browser settings, IP address, language settings, dates and times of connecting to a Site and other technical communications information), some of which may constitute Personal Data.

Creation of Personal Data: We may also create Personal Data about you, such as records of your interactions with us, and details of your accounts, subject to applicable law.

Relevant Personal and Sensitive Personal Data: The categories of Personal Data about you that we may Process, subject to applicable law, are as follows:

- Personal details: given name(s); preferred name; nickname(s), gender; date of birth / age; marital status; Social Security Number; Passport number(s); other Government(s) issued numbers (tax identification number, Green Card(s) number(s) including Driving Licence number); nationality; lifestyle and social circumstances; images of Passports; images of Driving Licences; images of Gun Licence(s); images of signatures; authentication data (passwords, mother maiden name, challenge/response questions and answers, PINs, face recognition, voice recognition) and photograph, visual images, personal appearance and behaviour.
- Family details: names and contact details of family members and dependents.
- Contact details: address; telephone number; fax number; email address; and social media profile details.
- Employment details: industry; role; business activities; names of current and former employers; work address; work telephone number; work fax number; work email address; and work-related social media profile details.
- Education history: details of your education and qualifications.
- Financial details: billing address; bank account numbers; credit card numbers; cardholder or account holder name and details; instruction records; transaction details; and counterparty details.
- Views and opinions: any views and opinions that you choose to send to us, or publish about us on (including on social media platforms).
- Electronic Identifying Data: IP address cookies, logs, online identifiers, device IDs, geolocation.

Processing your Sensitive Personal Data: We do not seek to collect or otherwise Process your Sensitive Personal Data, except where:

- The Processing is necessary for compliance with a legal obligation (e.g., to comply with our diversity reporting obligations);
- The Processing is necessary for the detection or prevention of crime (including the prevention of fraud) to the extent permitted by applicable law;
- You have manifestly made those Sensitive Personal Data public;
- The Processing is necessary to protect the vital interests of any individual; or
- We have, in accordance with applicable law, obtained your prior explicit consent prior to Processing your Sensitive Personal Data (as above, this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way); or
- Processing is necessary for reasons of substantial public interest and occurs on the basis of an applicable law that is proportionate to the aim pursued and provides for suitable and specific measures to safeguard your fundamental rights and interests.

We only Process Criminal Offences Data, and national identification numbers, to the extent required or permitted by applicable law.

Purposes for which we may Process your Personal Data, and legal bases for Processing: The purposes for which we may Process Personal Data, subject to applicable law, and the legal bases on which we may perform such Processing, are:

Processing activity

Legal basis for Processing

AML/KYC: fulfilling our regulatory compliance obligations, including ‘ Know Your Client ’ checks; and confirming and verifying your identity (including by using credit reference agencies); and screening against government, supranational bodies (including but not limited to the European Union and the United Nations Security Council) and/or law enforcement agency sanctions lists as well as internal sanctions lists and other legal restrictions.

- The Processing is necessary for compliance with a legal obligation; or
- The Processing is necessary in connection with any contract that you may enter into with us, or to take steps prior to entering into a contract with us; or
- We have a legitimate interest in carrying out the Processing for the purpose of protecting against fraud (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or
- We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

Client on-boarding: on-boarding new clients; and compliance with our internal compliance requirements, policies and procedures.

- The Processing is necessary in connection with any contract that you may enter into with us, or to take steps prior to entering into a contract with us; or
- We have a legitimate interest in carrying out the Processing for the purpose of on-boarding new clients (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms).

Credit worthiness: conducting credit reference checks and other financial due diligence

- We have a legitimate interest in carrying out the Processing for the purpose of conducting financial due diligence (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or
- We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

Provision of products and services to you: administering relationships and related services; performance of tasks necessary for the provision of the requested services; communicating with you in relation to those services.

- The Processing is necessary in connection with any contract that you may enter into with us, or to take steps prior to entering into a contract with us; or
- We have a legitimate interest in carrying out the Processing for the purpose of providing services to you (to the extent that such legitimate interest is not

overridden by your interests, fundamental rights, or freedoms); or

- We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

Marketing / Prospecting: communicating with you via any means (including via email, telephone, text message, social media, post or in person) subject to ensuring that such communications are provided to you in compliance with applicable law; and maintaining and updating your contact information where appropriate.

- We have a legitimate interest in carrying out the Processing for the purpose of conducting marketing and prospecting (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or
- We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

Operation of our Sites: operation and management of our Sites; providing content to you; displaying advertising and other information to you; and communicating and interacting with you via our Sites.

- The Processing is necessary in connection with any contract that you may enter into with us, or to take steps prior to entering into a contract with us; or
- We have a legitimate interest in carrying out the Processing for the purpose of providing services to you (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or
- We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

IT operations: management of our communications systems; operation of IT security; and IT security audits.

- The Processing is necessary for compliance with a legal obligation; or
- We have a legitimate interest in carrying out the Processing for the purpose of managing and operating our IT systems and ensuring the security of those systems (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms).

Health and safety: health and safety assessments and record keeping; and compliance with related legal obligations.

- The Processing is necessary for compliance with a legal obligation; or
- We have a legitimate interest in carrying out the Processing for the purpose of providing a safe and secure environment at our premises (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or
- The Processing is necessary to protect the vital interests of any individual.

Financial management: sales; finance; corporate audit; and vendor management.

- We have a legitimate interest in carrying out the Processing for the purpose of providing a safe and secure environment at our premises (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or
- We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

Research: conducting market or customer satisfaction research; and engaging with you for the purposes of obtaining your views on our products and services.

- We have a legitimate interest in carrying out the Processing for the purpose of providing a safe and secure environment at our premises (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or
- We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

Security: physical security of our premises (including records of visits to our premises and CCTV recordings); and electronic security (including login records and access details, where you access our electronic systems).

- The Processing is necessary for compliance with a legal obligation; or
- We have a legitimate interest in carrying out the Processing for the purpose of ensuring the physical and electronic security of our business and our premises (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms).

Investigations: detecting, investigating and preventing breaches of policy, and criminal offences, in accordance with applicable law.

- The Processing is necessary for compliance with a legal obligation; or
- We have a legitimate interest in carrying out the Processing for the purpose of detecting, and protecting against, breaches of our policies and applicable laws (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms).

Legal compliance: compliance with our legal and regulatory obligations under applicable law.

- The Processing is necessary for compliance with a legal obligation.

Legal proceedings: establishing, exercising and defending legal rights.

- The Processing is necessary for compliance with a legal obligation; or
- We have a legitimate interest in carrying out the Processing for the purpose of establishing, exercising or defending our legal rights (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms).

Improving our products and services: identifying issues with existing products and services; planning improvements to existing products and services; and creating new products and services.

- We have a legitimate interest in carrying out the Processing for the purpose of improving our products or services (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or
- We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

Risk Management: Audit, compliance, controls and other risk management.

- The Processing is necessary for compliance with a legal obligation; or
- We have a legitimate interest in carrying out the Processing for the purpose of managing the levels of risk to which our business is exposed (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms).

Fraud prevention: Detecting, preventing and investigating fraud.

- The Processing is necessary for compliance with a legal obligation; or

- We have a legitimate interest in carrying out the Processing for the purpose of detecting, and protecting against, fraud (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms).

3. Disclosure of Personal Data to third parties

We may disclose your Personal Data to other entities within the E Fund group, for legitimate business purposes (including providing services to you and operating our Sites), in accordance with applicable law. In addition, we may disclose your Personal Data to:

- you and, where appropriate, your family, your associates and your representatives;
- clients and customers of our businesses;
- credit reference agencies;
- anti-fraud services;
- Governmental, legal, tax and regulatory, or similar authorities, ombudsmen, and central and/or local government agencies, upon request or where required, including for the purposes of reporting any actual or suspected breach of applicable law or regulation;
- accountants, auditors, financial and tax advisors, lawyers, notaries and other outside professional advisors to E Fund Management (Hong Kong) Co., Limited or our funds, subject to binding contractual obligations of confidentiality in accordance with applicable law;
- banks, non-bank lenders, company administrators, trade and corporate registries and depositaries;
- general partners of funds we advise or manage;
- debt-collection agencies and tracing agencies;
- data aggregation services;
- accreditation bodies;
- third party Processors (such as payment services providers; shipping companies; etc.), located anywhere in the world, subject to the requirements noted below in this Section 3;
- any relevant party, claimant, complainant, enquirer, law enforcement agency or court, to the extent necessary for the establishment, exercise or defence of legal rights in accordance with applicable law;
- any relevant party for the purposes of prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including safeguarding against and the prevention of threats to public security in accordance with applicable law;
- to any relevant party in connection with AML/KYC requirements; any relevant third party acquirer(s), in the event that we sell or transfer all or any relevant portion of our business or assets (including in the event of a reorganization, dissolution or liquidation) or the assets or business of our funds;
- the press and the media; and
- voluntary and charitable organizations.

Our Sites may use third party plugins or content. If you choose to interact with any such plugins or content, your Personal Data may be shared with the third party provider of the relevant social media platform. We recommend that you review that third party's privacy policy before interacting with its plugins or content.

If we engage a third-party Processor to Process your Personal Data, the Processor will be subject to binding contractual obligations to: (i) only Process the Personal Data in accordance with our prior written instructions;

and (ii) use measures to protect the confidentiality and security of the Personal Data; together with any additional requirements under applicable law.

4. International transfer of Personal Data

Because of the international nature of our business, we may need to transfer your Personal Data within the E Fund group, and to third parties as noted in Section 3 above, in connection with the purposes set out in this Policy. For this reason, we may transfer your Personal Data to other countries that may have different laws and data protection compliance requirements, including data protection laws of a lower standard, to those that apply in the country in which you are located.

Where we transfer your Personal Data to other countries, we do so on the basis of:

- European Commission's adequacy decisions;
- our binding corporate rules;
- suitable standard contractual clauses; or
- other valid transfer mechanisms.

If you want to receive more information about the safeguards applied to international transfers of personal data, please use the contact details provided in Section 12 below.

5. Data Security

We have implemented appropriate technical and organizational security measures designed to protect your Personal Data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, unauthorised access, and other unlawful or unauthorised forms of Processing, in accordance with applicable law.

You are responsible for ensuring that any Personal Data that you send to us are sent securely.

6. Data Accuracy

We take reasonable steps designed to ensure that:

- your Personal Data that we Process are accurate and, where necessary, kept up to date; and
- any of your Personal Data that we Process that are inaccurate (having regard to the purposes for which they are Processed) are erased or rectified without delay.

From time to time we may ask you to confirm the accuracy of your Personal Data.

7. Data Minimisation

We take reasonable steps designed to ensure that your Personal Data that we Process are limited to the Personal Data reasonably required in connection with the purposes set out in this Policy.

8. Data Retention

We take every reasonable step to ensure that your Personal Data are only Processed for the minimum period necessary for the purposes set out in this Notice. The criteria for determining the duration for which we will retain your Personal Data are as follows:

(1) we will retain copies of your Personal Data in a form that permits identification only for as long as:

a. we maintain an ongoing relationship with you (e.g., where you are a recipient of our services, or you are lawfully included in our mailing list and have not unsubscribed); or

b. your Personal Data are necessary in connection with the lawful purposes set out in this Notice, for which we have a valid legal basis (e.g., where your personal data are included in a contract between us and your employer, and we have a legitimate interest in processing those data for the purposes of operating our business and fulfilling our obligations under that contract; or where we have a legal obligation to retain your Personal Data),

plus:

(2) the duration of:

a. any applicable limitation period under applicable law (i.e., any period during which any person could bring a legal claim against us in connection with your Personal Data, or to which your Personal Data may be relevant); and

b. an additional two (2) month period following the end of such applicable limitation period (so that, if a person bring a claim at the end of the limitation period, we are still afforded a reasonable amount of time in which to identify any Personal Data that are relevant to that claim),

and:

(3) in addition, if any relevant legal claims are brought, we may continue to Process your Personal Data for such additional periods as are necessary in connection with that claim.

During the periods noted in paragraphs (2)a and (2)b above, we will restrict our Processing of your Personal Data to storage of, and maintaining the security of, those data, except to the extent that those data need to be reviewed in connection with any legal claim, or any obligation under applicable law.

Once the periods in paragraphs (1), (2) and (3) above, each to the extent applicable, have concluded, we will either:

- permanently delete or destroy the relevant Personal Data;
- archive your Personal Data so that it is beyond use; or
- anonymize the relevant Personal Data.

9. Your legal rights

Subject to applicable law, you may have a number of rights regarding the Processing of your Personal Data, including:

- the right to request access to, or copies of, your Personal Data that we Process or control, together with information regarding the nature, processing and disclosure of those Personal Data;
- the right to request rectification of any inaccuracies in your Personal Data that we Process or control;
- the right to request, on legitimate grounds:
- erasure of your Personal Data that we Process or control; or
- restriction of Processing of your Personal Data that we Process or control;
- the right to have your Personal Data that we Process or control transferred to another Controller, to the extent applicable;
- restriction of Processing of your Personal Data that we Process or control;
- where we Process your Personal Data on the basis of your consent, the right to withdraw that consent; and
- the right to lodge complaints with a Data Protection Authority regarding the Processing of your Personal Data by us or on our behalf.

This does not affect your statutory rights.

Subject to applicable law, you may also have the following additional rights regarding the Processing of your Personal Data:

- the right to object, on grounds relating to your particular situation, to the Processing of your Personal Data by us or on our behalf; and
- the right to object to the Processing of your Personal Data by us or on our behalf for direct marketing purposes.

To exercise one or more of these rights, or to ask a question about these rights or any other provision of this Policy, or about our Processing of your Personal Data, please use the contact details provided in Section 13 below.

10. Cookies

A cookie is a small file that is placed on your device when you visit a website (including our Sites). It records information about your device, your browser and, in some cases, your preferences and browsing habits. We may Process your Personal Data through cookie technology, in accordance with our [Cookie Policy](#).

11. Direct Marketing

We may Process your Personal Data to contact you, primarily by mail and email and also on occasion by telephone, so that we can provide you with information concerning products and services that may be of interest, in accordance with applicable law.

If you do not wish to receive marketing communications from us you can opt out at any time by contacting our contact, or by electronically unsubscribing from emails we have sent to you. After you unsubscribe, we will not send you further promotional emails, but we may continue to contact you to the extent necessary for the purposes of any Services you have requested.

12. Contact details

If you have any comments, questions or concerns about any of the information in this Policy, or any other issues relating to the Processing of Personal Data by E Fund Management (Hong Kong) Co., Limited, please contact the E Fund Management (Hong Kong) Co., Limited Data Protection Office, or by using the following email: HK_Compliance@efunds.com.hk.

Alternatively, you could contact the E Fund Management (Hong Kong) Co., Limited Protection Office via post by addressing your letter to the relevant Controller entity as listed below in section 13.

13. Controllers

For the purposes of this Policy, the relevant controllers are:

Controller entity	Business address
E Fund Management (Hong Kong) Co., Limited	12/F, Nexus Building, 41 Connaught Road Central, Hong Kong
E Fund SICAV	12/F, Nexus Building, 41 Connaught Road Central, Hong Kong

14. Defined terms

Controller	The entity that decides how and why Personal Data is Processed. In many jurisdictions, the Controller has primary responsibility for complying with applicable data protection laws.
Data Protection	An independent public authority that is legally tasked with overseeing

Authority	compliance with applicable data protection laws.
Personal Data	Information that is about any individual, or from which any individual is identifiable.
Process or Processed or Processing	Anything that is done with any Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
Personnel	Any current, former and prospective directors, officers, consultants, employees, temporary staff, individual contractors, interns, secondees and other personnel.
Processor	Any person or entity that Processes Personal Data on behalf of the Controller (other than employees of the Controller).
Sensitive Personal Data	Personal Data about race or ethnicity, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health, sexual life, or any other information that may be deemed to be sensitive under applicable law.
Criminal Offences Data	Personal data about any actual or alleged criminal offences or penalties.