

## **PRIVACY POLICY**

As a user of the ECT Capital Management Limited website (hereinafter referred to as "this website"), it may be necessary for you to provide ECT Capital Management Limited (hereinafter referred to as "ECT") in which the same has an interest with your personal information at the time of registration and at various times when using this website. Such Information may include, without limitation, your name, date of birth, gender, contact information, e-mail address, education level, occupation and household income.

You hereby agree that the information you provide to ECT is provided voluntarily, and is accurate, true, current and complete. If this is not the case or ECT has reasonable grounds to suspect as such, ECT has the right to cancel your registration and/or refuse any and all current or future use of this website and its services to you. If the Information you provide to us is incomplete or incorrect, ECT may not be able to provide or continue to provide the services offered in this website to you or may not permit you or may discontinue your access to this website. You understand that any and all information you provide to ECT will be collected and may be used for the purposes of:

- collecting data for identity ratification and records
- sending you information about different products and services
- maintaining contact lists for correspondence
- compiling aggregate statistics on the website usage
- meeting any legal, governmental or regulatory requirements in Hong Kong or any other applicable jurisdiction, including disclosure or notification requirements
- carrying out the user's instructions, responding to enquiries by that user or made on his/her behalf and providing users with an effective and efficient service

ECT's web servers may also collect data relating to your online session, the use of which is to provide aggregated, anonymous, statistical information on the server's usage so that we may better meet the demands and expectations of visitors to our sites.

This type of data includes:

- The browser type and version
- Operating system
- The IP address and/or domain name

Certain web sites may place a "cookie" on your machine in order to provide personalized services and/or maintain your identity across multiple pages within a single session.

You acknowledge and agree that you are solely responsible for the form, content and accuracy of any material or information placed by you on this websites.

### **SECURITY OF PERSONAL DATA**

ECT has certain measures to ensure the security of the storage of the personal data. Physical records containing personal data are securely stored in locked containers when not in use. Computer data are stored on computer systems and storage media located within restricted areas.

Access to records and data without appropriate management authorization are strictly prohibited. Authorizations are granted only on a "need to know" basis that is commensurate with an individual's responsibilities and training.

The records of ECT are under the control of assigned information officers who are responsible to ensure the transfer of or access to information is legitimate and complies with the Ordinance. Proper audit trails are produced to validate any data modification for data integrity. There is a violation logging process for investigation of any unauthorized attempt to access information.

ECT is committed to ensuring the security of your information to prevent unauthorized access or disclosure, maintain data accuracy, and ensure the appropriate use of information, ECT has put in place appropriate physical, electronic, and managerial procedures to safeguard and secure the information collected online. ECT uses encryption when collecting or transferring sensitive data.

\* In case of discrepancies between the English and Chinese versions of this Privacy Policy, the Chinese version shall prevail.