



## **Privacy Policy Statement of Aozora Asia Pacific Limited**

The protection of that privacy is the utmost concern for Aozora Asia Pacific Limited (the “AAP”). AAP respects privacy and the personal data it collects during course of conducting the business (the “Personal Data”) that AAP is fully committed to implementing and complying with the data protection principles and all relevant provisions under the Personal Data (Privacy) Ordinance (the “PDPO”). AAP hereby establishes Privacy Policy Statement of Aozora Asia Pacific Limited which sets forth basic policy of AAP in protecting the privacy and the Personal Data.

### Article 1. Acquisition of the Personal Data:

The acquisition of the Personal Data by AAP shall be done in lawful manners and fairly.

### Article 2. Types of Personal Data to be collected by AAP:

#### A. Personal Data in relation to clients.

It includes the Personal Data that is obtained during the course of conducting business of AAP including but not limited to;

1. Client’s business-related information
  - a) Client’s asset information
  - b) Client’s business transaction records
  - c) Client’s various service preferences
  
2. Client’s Personal information and AML information
  - a) Name
  - b) Email address
  - c) Phone Numbers
  - d) Physical address
  - e) Personal ID number
  - f) Date of birth
  - g) Residential address
  - h) Tax information
  - i) Sanction records

B. Personal Data in relation to Employees and others.

It includes information obtained by AAP in the course of job application by the candidates, and information obtained in relation to human resources needs of its employees, and provision of the employees' welfare and benefit, as well as AAP's interaction with third parties (such as vendors, advisors etc). The Personal Data includes;

- a) Name
- b) Email address
- c) Phone Numbers
- d) Physical address
- e) Personal ID number
- f) Date of birth
- g) Residential address
- h) Tax information
- i) Criminal records

The Personal Data includes but not limited to personal information contained in the followings:

- A. Resumes and CVs
- B. Background checks
- C. Reference Letter
- D. Job application forms
- E. Inquiries in any form/manner
- F. Employee data list
- G. Appraisal and disciplinary records
- H. Compensations and salaries,
- I. Corporate benefit details;
- J. Financial accounts (bank account, securities accounts)
- K. Tax related information
- L. Any other relevant information

Article 3. Purpose of collection:

The reason for AAP to hold various Personal Data varies however, major purpose of handling the Personal Data includes:

- a) communication, including responding to queries to AAP or provide feedback from AAP;
- b) business administration, business reporting and statistical analysis purposes;
- c) to conduct loan transaction business and ancillary activities, including risks management;
- d) to confirm the identity of customers or their agents;
- e) to seek advice from external advisors;
- f) to engage, subscribe and consume services from service vendors, counterparties;

- g) to send season's greetings and invitations to customers for seminars or conferences; and
- h) any purpose relating to or in connection with compliance with any applicable laws and/or regulations, including any law, rule, regulation, directive, code, guideline, circular, court order, order, instruction or request of regulatory bodies, tax or law enforcement authorities, stock exchanges or guideline or guidance given or issued by any self-regulatory or industry bodies and in each instance, anywhere in the world.

Article 4. Disclosure to the third parties:

Personal Data obtained by AAP shall be kept confidential, however, it may be disclosed to the following parties including the parties outside Hong Kong:

- a) any members and affiliates of the Aozora Group which engages in banking, financing, financial services excluding consumer financing business, its agents, contractors or third party service providers (or a subsidiary, holding company or related company thereof) who provides administrative, telecommunications, computer, payment, debt collection, data processing or other services to the AAP or any other member of Aozora Group in connection with the operation of the AAP's business;
- b) any service vendors including financial institutions, banks, insurers;
- c) External auditors and external legal and financial advisors;
- d) other suppliers, business partners and sub-contractors engaged by AAP in connection with the operation of business of AAP such as:
  - 1. administrative service providers;
  - 2. human resource providers;
  - 3. telecommunications providers;
  - 4. IT services and software suppliers;
  - 5. data analytics providers;
  - 6. data entry and processing service providers; and
  - 7. cloud service providers;
- e) persons or companies seeking references in respect of clients, provided clients have given prescribed consent;
- f) our business contacts in the course of performing our services for clients (including marketing and business development activities);
- g) courts, regulatory bodies, tax or law enforcement authorities, stock exchanges or self-regulatory and industry bodies anywhere in the world for any purpose in connection with compliance with any law, rule, regulation, code, guideline, circular, court order, order or request; and
- h) any actual or proposed assignee of the AAP or any other member of Aozora Group, or participant or sub-participant or transferee of the rights of the Company or those of any other member of Aozora Group in respect of the data subject.

Article 5. Unauthorized Use:

AAP shall not, and shall cause its employees and managements not to use any Personal Data which is obtained in unauthorized purpose and manners at anytime.

Article 6. Compliance:

AAP requires all of our staffs and employees comply with PDPO and the management of AAP shall monitor, supervise compliance with the PDPO within the AAP, and from time to time enforce relevant rules and related trainings to staffs or employees where necessary.

Article 7. Protection of Personal Data:

AAP shall, pursuant to its internal rules, take appropriate measure to protect the Personal Data collected.

Article 8. Retention Policy:

The retention policy of Personal Data collected by AAP shall be that, AAP shall retain the same as long as the purposes of such collection lasts, however, the maximum retention period is 10 years or less in general.

Article 9. Personal Information Collection Statement:

When AAP collects Personal Data, the Personal Information Collection Statement of AAP shall be provided to data subject on or before the collection in an appropriate format and manner.

Article 10. Personal Data inquiry and correction:

It should be noted that under PDPO and relevant codes and guidelines issued pursuant thereto, the following inquiry and correction rights are granted to the individuals:

- a) check whether the Company holds Personal Data about him/her and may request access to such information;
- b) request the Company to correct any Personal Data relating to him/her which is inaccurate;
- c) request the Company to specify its policies and practices in relation to Personal Data and to be informed of the kind of Personal Data held by the Company; and
- d) object to the use of his/her Personal Data for marketing purposes; the Company will not use his/her Personal Data for these purposes if he/she communicates his/her objection to the AAP.

APP shall have the right to charge a reasonable fee for the processing of any request for access or correction mentioned above.

Data Protection Officer shall be responsible for the requests for (i) access to or correction of Personal Data or (ii) information regarding policies and practices and kinds of information held by the AAP. The contact address of our Data Protection Officer shall be,

Suites 3506-07, Two International Finance Centre, 8 Finance Street, Central, Hong Kong.  
Tel: (852) 2108-2800

Again, AAP treats privacy and protection of the Personal Data very seriously. For any questions in relation to this Policy or any other concerns shall be addressed to the Data Protection Officer of AAP. This Policy may from time to time be modified at the sole discretion of AAP.

### **Personal Information Collection Statement of Aozora Asia Pacific Limited**

Aozora Asia Pacific Limited (AAP or the "Company") regards the protection of your interests and the security and your personal data ("Personal Data") as well as confidentiality information (including data that can be used to identify a natural person or personally identifiable information) is of the utmost importance. We will protect your Personal Data as a core value and principle of our practice. This personal information collection statement ("Statement") informs you of the purpose for which your Personal Data collected by us in connection with your use of our services and this website will be used following collection, to whom your Personal Data will be transferred; and to whom you may address Personal Data access or correction requests.

The Company reserves the right to change, modify, add, or remove portions of this statement and policy at any time for any reason. We suggest that you review this statement and policy periodically for changes.

#### **1. Methods of Information Collection**

We may receive Personal Data you submit to or through our website or through other means. Please be reminded that it is completely voluntary for you to provide the Personal Data we have requested. However, failure to provide such Personal Data may result in the Company being unable to establish or continue our relationship with you. Please ensure that all information provided to us is accurate, complete and up-to-date. Personal Data you provide that is inaccurate or incomplete may adversely affect how we could serve you or engage with you.

#### **2. Information Collected and Purpose of Information Collection**

The types of the Personal Data which we may collect include your personal details, contact details, such as email addresses and phone numbers, nationality and country of residence details, photograph, audio or visual images or recording, and personal identifier(s).

### **3. Use of Personal Data**

We may use your Personal Data for the purposes set out below (as applicable) and for other directly related purposes (the "Purposes"):

- a) communicating with you, including responding to your queries or feedback to us;
- b) business administration, business reporting and statistical analysis purposes;
- c) to conduct our business and ancillary activities, including risks management;
- d) to confirm the identity of customers or their agents;
- e) to send season's greetings and invitations to customers for seminars or conferences; and f. any purpose relating to or in connection with compliance with any applicable laws and/or regulations, including any law, rule, regulation, directive, code, guideline, circular, court order, order, instruction or request of regulatory bodies, tax or law enforcement authorities, stock exchanges or guideline or guidance given or issued by any self- regulatory or industry bodies and in each instance, anywhere in the world.

### **4. Transferee**

Personal Data obtained from you and held by the Company will be kept confidential but the Company may provide such information to the following parties (whether within or outside Hong Kong):

- a) any members and affiliates of the Aozora Group which engages in financial services business, its agents, contractors or third party service providers (or a subsidiary, holding company or related company thereof) who provides administrative, telecommunications, computer, payment, debt collection, data processing or other services to the Company or any other member of Aozora Group in connection with the operation of the Company's business;
- b) our insurers, bankers, auditors and external legal and financial advisors;
- c) other service providers, suppliers, business partners and sub-contractors engaged by us in connection with the operation of our business such as:
  - 1. administrative service providers;
  - 2. human resource providers;
  - 3. telecommunications providers;
  - 4. IT services and software suppliers;
  - 5. data analytics providers;
  - 6. data entry and processing service providers; and
  - 7. cloud service providers;
- d) persons or companies seeking references in respect of you, provided you have given your prescribed consent;
- e) our business contacts in the course of performing our services for you (including marketing and business development activities);

- f) courts, regulatory bodies, tax or law enforcement authorities, stock exchanges or self regulatory and industry bodies anywhere in the world for any purpose in connection with compliance with any law, rule, regulation, code, guideline, circular, court order, order or request; and
- g) any actual or proposed assignee of the Company or any other member of Aozora Group, or participant or sub-participant or transferee of the rights of the Company or those of any other member of Aozora Group in respect of the data subject.

## **5. Aggregate Information**

We generally record certain usage information, such as the number and frequency of visitors to our website. This information may include the internet browser you are using and your IP address etc. If we use such data at all it will be on an aggregate basis, and we will not disclose to third parties any information that could be used to identify you personally.

## **6. Rights of Hong Kong residents under the Personal Data (Privacy) Ordinance**

Under and in accordance with the terms of the Personal Data (Privacy) Ordinance (the "PDPO") of Hong Kong and codes and guidelines issued pursuant thereto, any individual:

- a) may check whether the Company holds Personal Data about him/her and may request access to such information;
- b) may request the Company to correct any Personal Data relating to him/her which is inaccurate;
- c) may request the Company to specify its policies and practices in relation to Personal Data and to be informed of the kind of Personal Data held by the Company; and
- d) may object to the use of his/her Personal Data for marketing purposes; the Company will not use his/her Personal Data for these purposes if he/she communicates his/her objection to the Company.

In accordance with the terms of PDPO, the Company has the right to charge a reasonable fee for the processing of any request for access or correction mentioned above.

Requests for (i) access to or correction of Personal Data or (ii) information regarding policies and practices and kinds of information held by the Company should be sent to our Data Protection Officer:

## **7. Data Protection Officer**

Suites 3506-07, Two International Finance Centre, 8 Finance Street , Central, Hong Kong.

Tel: (852) 2108-2800

## **8. Third Party Websites**

The Company is not responsible for the content or for the privacy policies and customer information practices of third party internet websites hyperlinked from our website.