# 安基財務有限公司之個人資料私隱政策

安基財務有限公司("安基")為大新銀行有限公司之附屬公司及大新金融集團("大新集團")之成員。

就本聲明而言·大新集團成員包括大新金融集團有限公司·全部其於本地及海外不論直接或間接擁有之附屬公司· 及所有其聯營或關連公司。

#### 1. 引言

訂立本聲明的目的·是旨在列出安基遵守保障資料原則的政策及實務·以遵守《個人資料(私隱)條例》(下稱「條例」)各項條款及條文。

## 2. 安基持有的個人資料的種類

概括而言,安基持有的個人資料主要分為兩大類。他們分別由以下各項所含個人資料組成:

# a. 客戶個人資料

客戶在申請開立戶口,延續戶口及建立或延續信貸或要求安基提供其他服務時,需不時向安基提供個人資料。

#### b. 員工個人資料

員工記錄·其中包括但不限於姓名、聯絡詳情、出生日期、國籍、其身份證及/或護照號碼及證件發出日期和 地點、申請書、推薦書、工作表現評核報告與懲戒記錄、薪資及提供福利的記錄及教育背景。

## 3. 保存個人資料的目的

## a. 關於客戶

有關的客戶資料將可能會被安基或該等資料的接收人用於下列用途:-

- (i) 為處理服務·信貸授信的申請及為客戶提供服務和信貸便利所涉及之日常運作;
- (ii) 於客戶申請信貸時及於每年(通常一次或多於一次)的定期或特別信貸覆核時,進行信用檢查;
- (iii) 協助其他財務機構 (包括任何大新集團成員)、信用卡或消費卡發行公司及收數公司作信貸檢查及收數;
- (iv) 確保客戶的信用維持良好;
- (v) 為客戶設計財務服務或有關產品;
- (vi) 推廣服務、產品及其他標的(詳情請參閱(有關客戶資料的客戶通知·下稱「通知」)的 q 段);
- (vii) 確定安基對客戶或客戶對安基的債務;
- (viii)向客戶及為客戶提供擔保或抵押的人仕追收欠款及執行客戶向安基應負之責任;
- (ix) 履行根據下列適用於安基或其任何分行或安基或其任何分行被期望遵守的就披露及使用資料的義務、規定或安排:
  - (1) 不論於香港特別行政區("香港")境內或境外及不論目前或將來存在的對其具法律約束力或適用的任何法律;
  - (2) 不論於香港境內或境外及不論目前或將來存在的任何法律、監管、政府、稅務、執法或其他機關,或金融服務供應商的自律監管或行業組織或協會作出或發出的任何指引或指導;及
  - (3) 安基或其任何分行因其位於或跟相關本地或外地的法律、監管、政府、稅務、執法或其他機關,或自律 監管或行業組織或協會的司法管轄區有關的金融、商業、業務或其他利益或活動,而向該等本地或外地 的法律、監管、政府、稅務、執法或其他機關,或金融服務供應商的自律監管或行業組織或協會承擔或 被彼等施加的任何目前或將來的合約或其他承諾;

- (x) 遵守與大新集團同一集團的公司為符合制裁或預防或偵測清洗黑錢、恐怖分子融資活動或其他非法活動的 任何方案就於大新集團內共用資料及資訊及/或資料及資訊的任何其他使用而指定的任何義務、要求、政 策、程序、措施或安排;
- (xi) 使安基的實在或建議承讓人·或安基對客戶的權利的參與人或附屬參與人評核意圖成為轉讓·參與或附屬 參與的交易;
- (xii) 進行配對程序;
- (xiii)編制及維持安基的信貸評分模式;及
- (xiv)與上述有關的用途。

## b. 關於員工

有關的員工資料將可能會被安基用於下列用途:

- (i) 處理受聘申請;
- (ii) 進行及提供推薦及背景檢查
- (iii)檢討、決定及執行薪酬、獎金及或其他福利;
- (iv)評核員工的工作績效及制定有關員工升遷、培訓、調用、調職及職業生涯發展之決策;
- (v) 評審員工貸款及其他福利和享有權的資格及有關的管理;
- (vi)監察對規例規定之遵循情形及安基內部政策規定

## 4. 個人資料的收集

在收集個人資料的過程中·安基會分別向資料當事人及員工提供一份通知及關於個人資料(私隱)條例的通告·述明收集資料的目的、可能獲轉交資料的人士的身分類別、查閱及改正資料的權利·以及其他有關資料。

當閣下瀏覽安基網頁或點擊安基的網上廣告,"Cookies"將會存放置於閣下的設備上。"Cookies"是一個細小文字檔案經由網站收取而跟閣下的瀏覽器作互動之用。安基使用"Cookies"來連接標識符 (session identifiers)但當中並不會收集閣下的個人資料。"Cookies"所收集的資料將會被用作連線管理 (session management)。大多數網絡瀏覽器最初均設定為接受 cookies。閣下可以透過變更網絡瀏覽器的設定選擇不接受"Cookies"。若閣下把瀏覽器設定為不接受"Cookies",閣下將不能瀏覽部份網站功能。安基不會把可識別使用者的有關資料轉移至任何第三方。

#### 5. 個人資料的保安

安基致力保障所有個人資料·只准許獲授權之員工查閱·透過提供安全的儲存設施·以及在資料存置設備實施保安措施。在傳送資料時·會採用加密法技術予以保障敏感性的個人資料。

如安基聘用資料處理者以代安基處理個人資料(不論是在香港或香港以外地方),安基將採用合約規範方法或其他 方法,以防止轉移予該資料處理者作處理的個人資料未獲授權或意外地被查閱、處理、刪除、喪失或使用。

## 6. 個人資料之保留

客戶及/或員工所提供的個人資料的保存時間不超過將其保存以貫徹該資料於被收集時而被使用於或會被使用於的目的所需的時間及不時為符合法定、監管及會計的規定。

# 7. 個人資料的披露

除非作出有關披露是根據通知及/或就有關員工記錄是根據關於個人資料(私隱)條例的通告及/或安基受約束的任何法例下容許或規定,否則個人資料不會披露予其他人士。

# 8. 安基私隱政策聲明的修改

本聲明會不時作出修改。請定期聯絡安基及/或瀏覽安基網站以了解安基最新之私隱政策版本。

# 9. 查閱資料要求及改正資料要求

安基會按照條例的規定,依從及處理一切查閱資料及改正資料要求。

安基可按照條例依從查閱資料要求收取合理的費用。

查閱資料要求及改正資料要求可向安基資料保障主任提出。

## 10. 安基資料保障主任的聯絡資料

查閱資料要求或改正資料要求或索取關於資料政策及慣例或所持有的資料種類的要求,應向下列人士提出:

職位	資料保障主任
地址	安基財務有限公司
	香港郵政信箱 9154 號
傳真	2877 8499

<sup>\*</sup>此中文版本只供參考之用,如與英文版本有任何區異,以英文版本為準。

2015年05月

# **OK Finance Limited's Privacy Policy Statement**

OK Finance Limited ("Company") is a subsidiary of Dah Sing Bank, Limited and a member of Dah Sing Financial Group ("Dah Sing Group").

For the purpose of this statement, a member of Dah Sing Group shall include Dah Sing Financial Holdings Limited, all of its local and overseas subsidiaries whether owned by it directly or indirectly and all associated or related companies.

#### 1. Introduction

The purpose of this Statement is to establish policies and practices of the Company's commitment to protect personal data privacy in accordance with the provisions of the Personal Data (Privacy) Ordinance ("Ordinance").

# 2. Kinds of Personal Data Held by The Company

There are two broad categories of personal data held by the Company. They comprise personal data contained in the following:

#### a. Personal data of customers

It is necessary for customers to supply the Company with personal data from time to time in connection with the opening or continuation of accounts and the establishment or continuation of credit facilities or provision of other services.

#### b. Personal data of employees

Employee records, which include but are not limited to the name, contact details, date of birth, nationality, their identity card and / or passport numbers and place and date of issue, application forms, references, appraisal and disciplinary records, remuneration details and educational background.

#### 3. Purposes of Keeping Personal Data

## a. In relation to the customers:

The purposes for which data relating to a customer may be used by the Company or the recipient of such data are as follows:-

- the processing of applications for services and credit facilities and the daily operation of the services, credit facilities provided to customers;
- (ii) conducting credit checks at the time of application for credit and at the time of regular or special reviews which normally will take place one or more times each year;
- (iii) assisting other financial institutions (including any member of Dah Sing Group), credit or charge card issuing companies and debt collection agencies to conduct credit checks and collect debts;
- (iv) ensuring ongoing credit worthiness of customers;
- (v) designing financial services or related products for customers' use;
- (vi) marketing services and products and other subjects (please see further details in (paragraph (g) in Notice to Customers relating to Customer's Data ("Notice"));
- (vii) determining the amount of indebtedness owed to or by customers;
- (viii) collection of amounts outstanding from customers and those providing security for customers' obligations and the enforcement of obligations of customers and those providing security;
- (ix) complying with the obligations, requirements or arrangements for disclosing and using data that apply to the Company or any of its branches or that it is expected to comply according to:
  - (1) any law binding or applying to it within or outside the Hong Kong Special Administrative Region ("Hong Kong") existing currently and in the future;
  - (2) any guidelines or guidance given or issued by any legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations of financial services providers within or outside the Hong Kong existing currently and in the future; and
  - (3) any present or future contractual or other commitment with local or foreign legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations of financial services providers that is assumed by or imposed on the Company or any of its branches by reason of its financial, commercial, business or other interests or activities in or related to the jurisdiction of the relevant local or foreign legal, regulatory, governmental, tax, law enforcement or other authority, or self-regulatory or industry bodies or associations;
- (x) complying with any obligations, requirements, policies, procedures, measures or arrangements for sharing data and information within Dah Sing Group and/or any other use of data and information in accordance

- with any group-wide programmes for compliance with sanctions or prevention or detection of money laundering, terrorist financing or other unlawful activities;
- (xi) enabling an actual or proposed assignee of the Company, or participant of sub-participant of the Company's rights in respect of the customer to evaluate the transaction intended to be the subject of the assignment, participation or sub-participations;
- (xii) conducting matching procedures;
- (xiii) creating and maintaining the Company's credit scoring models; and
- (xiv)purposes relating thereto.

## b. In relation to the employees:

The purposes for which data relating to employees may be used by the Company as follows:

- (i) processing employment application;
- (ii) performing and providing reference and background check;
- (iii) reviewing, determining and administering salaries, bonuses and any other benefits;
- (iv)appraising job performance, consideration of promotion, training, secondment, transfer and career development;
- (v) consideration of eligibility for staff loans and other benefits and entitlements;
- (vi)monitoring compliance with regulatory requirements and internal policies of the Company.

#### 4. Collection of Personal Data

In relation to the collection of personal data, the Company will provide the individuals and employees with Notice and Notice relating to the Personal Data (Privacy) Ordinance respectively, informing them the purpose of collection, classes of persons to whom the data may be transferred, their rights to access and correct the data and other relevant information.

When you visit the Company's website or click on our online advertisements, cookies would be stored in your device. "Cookies" is a small-text file retrieved by the site, as part of our interaction with your browser. The Company uses "cookies" to capture the information of session identifiers of the website while no personal information is captured in the cookies. The information gathered by cookies may be used for session management. Most web browsers are initially set up to accept cookies. You can choose to "not accept" by changing the settings on your web browsers. If you disable cookies in your web browsers, you will not be able to access some of the site functions. No personally identifiable information will be transferred to third party.

# 5. Security of Personal Data

The Company commits to protect the personal data by restricting access by authorized personnel, providing secure data storage facilities and incorporating security measures into equipment in which data is held. Encryption technology is employed for sensitive data transmission.

If the Company engages data processors to handle or process personal data on the Company's behalf (whether within or outside Hong Kong), the Company would adopt contractual or other means to prevent unauthorized or accidental access, processing, erasure, loss or use of the data transferred to the data processors for processing.

#### 6. Retention of Personal Data

The personal data provided by customers and/or the employees will not be kept longer than necessary for the fulfillment of the purposes for which the personal data are or are to be used at the time of the collection and for compliance with the legal, regulatory and accounting requirements from time to time.

#### 7. Disclosure of Personal Data

The personal data would not be disclosed to other parties unless such disclosure is made in accordance with the Notice and/or Notice relating to the Personal Data (Privacy) Ordinance in connection with the collection of employee records and/or the disclosure is permitted or required by any law binding on the Company.

## 8. Revision of Privacy Policy Statement

This Statement is subject to review and amend from time to time. Please approach the Company and/or visit the Company's website regularly for the Company's latest Statement.

# 9. Data Access Requests and Data Correction Requests

The Company would comply with and process all data access and correction requests in accordance with the provisions of the Ordinance.

The Company may impose a reasonable fee for complying with a data access request in accordance with the Ordinance.

Data access requests and data correction requests to the Company may be addressed to the Company's Data Protection Officer.

# 10. Contact Details of the Company's Data Protection Officer

Request for access to personal data or correction of personal data or for information regarding policies and practices on personal data and kinds of data held should be addressed to:

Title	Data Protection Officer
Address	OK Finance Limited
	GPO Box 9154, Hong Kong
Fax	2877 8499

<sup>\*</sup>The Chinese version is for reference only. If there is any conflict between the English and the Chinese versions, the English version shall prevail.

May 2015