

**Wincomply Investments Limited**  
**Personal Information Collection Statement ("Statement")**

**1 General**

- 1.1 In your interactions with Wincomply Investments Limited ("**Wincomply**", "**we**", "**us**" or "**our**") you may be required to supply to us or we may collect from you your personal data in connection with various matters, including the following:
- 1.1.1 your access to and use of our website and the establishment of your user account; and
  - 1.1.2 your purchase of our products and services;
- 1.2 "**Personal data**" means data:
- 1.2.1 relating directly or indirectly to a living individual;
  - 1.2.2 from which it is practicable for the identity of the individual to be directly or indirectly ascertained; and
  - 1.2.3 in a form in which access to or processing of the data is practicable.
- 1.3 Failure to supply applicable or required personal data may result in you being unable to access or use the Platform or establish an user account or Wincomply being unable to process, establish, maintain or provide its products and services to you.
- 1.4 This Statement informs you about how we may collect and use your personal data.
- 1.5 You should also read our Privacy Policy Statement, a copy of which can be accessed at <https://www.wincomply.com>.

**2 Collection of Personal Data**

- 2.1 Wincomply collects your personal data when you transact or communicate with Wincomply, for example when you access or use the Platform, apply for an user account on the Platform or enquire about or purchase our products and services.
- 2.2 Wincomply may also collect your personal data from third parties to conduct, amongst other things, background or know-your-client checks.
- 2.3 The types of personal data Wincomply may collect includes but is not limited to:
- 2.3.1 personal information: this includes your name, age, date of birth, identity card number, nationality, facial and biometric data, and pictures, videos and documents of or relating to you;
  - 2.3.2 contact information: this includes your telephone numbers, addresses, mailing addresses, email addresses and fax numbers;
  - 2.3.3 financial information: this includes information regarding your financial status and credit history (including but not limited to images or documents). We collect this information to monitor suspicious transaction activity for fraud protection, legal case resolution and other purposes disclosed in this Statement;

- 2.3.4 business information: this includes your company name, business title, and contact information at work;
  - 2.3.5 interest and preferences: this includes your interests, preferences and habits; and
  - 2.3.6 contact list: this includes your list of contact names and phone numbers.
- 2.4 We may ask you for personal data of another person. Before you provide to us any personal data about another person, you must give to that person a copy of this Personal Information Collection Statement and, in particular, tell him/her that you will provide us with his/her personal data and how we may use his/her personal data.
- 2.5 We may not be able to provide you with our products and services if we hold out-dated personal data. You must ensure that all personal data you have provided to us is up-to-date, and promptly provide us with updated personal data upon any change of circumstances to ensure that all our products and services can be provided to you without any disruption.

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

Personal data may be used for any one or more of the following purposes:

- 3.1 processing your enquiries for and purchases of products and services;
- 3.2 operating, maintaining and providing our products and services to you;
- 3.3 conducting background, credit or know-your-client checks on you (whether in respect of an application for our products and services, or as part of our ongoing reviews);
- 3.4 maintaining your credit history for present and future reference;
- 3.5 ensuring your ongoing credit worthiness;
- 3.6 for disclosure to the persons specified in paragraph 4 below;
- 3.7 marketing services, products and other subjects (please see further details in paragraph 5 below) from Wincomply or any other member of the “**Group**” (meaning Wincomply, its holding company, and any of our or their respective subsidiaries, joint ventures and associated entities);
- 3.8 enforcing our rights against you, including without limitation the collection of outstanding amounts from you;
- 3.9 meeting or complying with any existing or future law, judgment, court order, voluntary code, regulation, obligation, sanctions regime, requirement or other arrangement that we or any other member of the Group are subject to or expected to comply with within and outside of Hong Kong;
- 3.10 meeting or complying with any obligations, requirements, policies, procedures, measures or arrangements for sharing data and information within the Group;
- 3.11 comparing your data with other data subjects or other persons for credit checking, data verification or otherwise producing or verifying data, whether or not for the purpose of taking action against you or such other data subjects;

- 3.12 maintaining a credit history of you and other data subjects (whether or not there exists any relationship between the other data subjects and Wincomply) for present and future references; and/or
- 3.13 any other matter or purposes relating to the purposes listed above or as shall be considered reasonably necessary by Wincomply.

#### **4 Disclosure of Personal Data**

Your personal data will be kept confidential but we may provide, transfer or disclose such data to any one or more of the following parties (whether within or outside the Hong Kong Special Administrative Region) for the purposes set out in paragraph 3 above:

- 4.1 any member of the Group or an affiliate of Wincomply;
- 4.2 any agent, sub-agent, contractor, vendor, partner or third-party service provider that provides administrative, professional, advisory, telecommunications, computer, payment, data processing, debt collection or other services to us in connection with the establishment, operation, maintenance or provision of our products and services;
- 4.3 any other person under a duty of confidentiality to Wincomply and has undertaken to keep such information confidential;
- 4.4 credit reference agencies (including the operator of any centralized database used by the credit reference agencies) and, in the event of default, to debt collection agencies and/or solicitor firms;
- 4.5 any local or foreign (i) governmental, tax, legal, regulatory, judicial, administrative, public or law enforcement body; (ii) exchange, central bank or other similar authority; or (iii) self-regulatory or industry bodies or associations, in each case with jurisdiction over all or any part of the Group;
- 4.6 any actual or proposed assignee or transferee of Wincomply's rights in respect of you; and/or
- 4.7 subject to paragraph 5, for the purposes set out in paragraph 3.7:
  - 4.7.1 any other member of the Group;
  - 4.7.2 third parties including financial institutions, insurers, credit card companies, securities, commodities, investment services providers and related services providers;
  - 4.7.3 third party reward, loyalty, co-branding and privileges programme providers;
  - 4.7.4 our co-branding partners; and
  - 4.7.5 charitable or non-profit making organisations.

#### **5 Direct Marketing**

- 5.1 We intend to use your personal data in direct marketing, for which we require your consent (which includes an indication of no objection or no election to opt-out).

- 5.2 Your name, contact details, products and services portfolio information, consumption history, credit and transaction pattern and behaviour, financial background and demographic data may be used by us for direct marketing purposes.
- 5.3 The following classes of services, products and subjects may be marketed to you:
- 5.3.1 credit / loan facilities, financial, insurance, credit card, health and well-being, bill management and related services and products;
  - 5.3.2 reward, loyalty or privileges programmes and related services and products; and
  - 5.3.3 donations and contributions for charitable and/or non-profit making purposes.
- 5.4 The above services, products and subjects may be provided or solicited by us and/or the parties referred to in paragraph 4.7.
- 5.5 In addition to marketing the above services, products and subjects, we also intend to provide the personal data described in paragraph 5.2 to all or any of the persons described in paragraph 4.7 for use by them in marketing their services, products and subjects, for which we require your written consent (which includes an indication of no objection or no election to opt-out).
- 5.6 We may receive money or other property in return for providing your personal data to the persons in paragraph 4.7 and, when requesting your consent or no objection as described in paragraph 5.5, we will inform you if we will receive any money or other property in return for providing your personal data to the other persons.
- 5.7 **If you do not wish for us to use, or provide to other persons, your personal data for use in direct marketing as described above, you may exercise your opt-out right by notifying us.**

## **6 Your Rights**

- 6.1 In accordance with the Personal Data (Privacy) Ordinance, you have the right:
- 6.1.1 to check whether we hold personal data about you and to request access to such personal data;
  - 6.1.2 to require us to correct any personal data relating to you which is inaccurate; and
  - 6.1.3 to ascertain our policies and procedures in relation to personal data and to be informed of the kind of personal data held by us.
- 6.2 In accordance with the Personal Data (Privacy) Ordinance, we have the right to charge a reasonable fee for the processing of any personal data access request.
- 6.3 You should send requests for access to personal data, correction of personal data, information regarding our policies and practices in relation to personal data, and information regarding the kinds of personal data that we hold, to:
- WINCOMPLY Investments Limited  
Email: [info@wincomply.com](mailto:info@wincomply.com)
- 6.4 Nothing in this Statement shall limit your rights under the Personal Data (Privacy) Ordinance.

Should there be any inconsistencies between the English and Chinese versions, the English version shall prevail.

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