

**私隱政策聲明（「本聲明」）**  
**美聯資產管理有限公司（「本公司」）**

**1. 總覽**

本公司致力保護及保障個人資料。因此，本公司之政策為確保其就有關收集、使用、轉移、保存及查閱個人資料的政策及常規符合香港法例第 486 章《個人資料（私隱）條例》（「該條例」）的規定。

**2. 所收集的個人資料類別**

為達至本公司能提供資產管理及財務策劃服務的目的，客戶可能被要求提供其個人資料予本公司，而該等個人資料包括但不限於姓名、聯絡資料（包括但不限於電話號碼、傳真號碼、電郵及／或通訊地址）、身份證明文件號碼及可能載有客戶的個人資料的文件副本，例如身份證、護照、銀行月結單及公用事業賬單。提供個人資料純屬自願性質，若客戶未能提供該等個人資料，本公司可能因此而未能提供資產管理及財務策劃服務。

**3. 個人資料的使用**

客戶所提供的個人資料可能被本公司用於以下用途：

- (a) 提供資產管理及財務策劃服務；
- (b) 直接促銷本公司之資產管理及財務策劃服務；
- (c) 轉移至下列第 6 條所列之機構或人士（「第三方」）用於直接促銷與下述第 5 條促銷標的的類別有關之服務、獎賞及／或優惠計劃及／或活動（「該等服務」）；
- (d) 遵守適用法律、規則及規例，以及由監管機構所發出並適用於本公司的指引、執業通告、操守守則及執業指引；
- (e) 向客戶收取欠款；及／或
- (f) 法律程序及／或判決及／或命令的強制執行。

**4. 使用個人資料作直接促銷**

本公司擬使用客戶的姓名及聯絡資料（包括電話號碼、傳真號碼、電郵及／或通訊地址）作直接促銷本公司之資產管理及財務策劃服務。

**5. 轉移個人資料作直接促銷**

本公司擬轉移客戶的姓名及聯絡資料（包括電話號碼、傳真號碼、電郵及／或通訊地址）至第三方用作直接促銷下列該等服務，而本公司或會因此而獲得利益：

- (a) 地產代理；
- (b) 財務策劃；
- (c) 資產管理；
- (d) 保險；
- (e) 物業估值；
- (f) 按揭轉介；
- (g) 移民顧問；
- (h) 銀行服務；
- (i) 法律服務；及／或
- (j) 獎賞及／或優惠計劃及／或活動。

**6. 個人資料的轉移**

由本公司所管有的客戶個人資料可能會被轉移至以下各方：

- (a) 向本公司提供獎賞及／或優惠的提供者；
- (b) 律師事務所、銀行、金融機構、保險公司、按揭轉介、財務策劃、物業估值、移民顧問及／或資產管理服務提供者；
- (c) 政府機構、監管機構及／或其他合法的機關；
- (d) 法院、審裁處及／或參與法律程序的各方；及／或
- (e) 收數公司。

**7. 要求停止直接促銷**

根據該條例，即使客戶已同意本公司使用及／或轉移其個人資料至第三方作直接促銷，客戶仍有權隨時要求本公司在不收費的情況下停止使用及／或轉移其個人資料至第三方作直接促銷。客戶可致函 [dpo@midlandwealth.com](mailto:dpo@midlandwealth.com) 或香港九龍旺角亞皆老街 33 號美聯金融大廈 14 樓予本公司之「資料保障主任」作出有關要求，本公司將停止使用其個人資料作該有關用途。

**8. 網絡紀錄**

當閣下瀏覽本公司網站時，網站伺服器會紀錄閣下的到訪資料，包括閣下的 IP 地址來源、瀏覽時間、網址、瀏覽器類別及裝置類別（網站伺服器訪客紀錄）。本公司使用這些網站伺服器訪客紀錄作維持及改善網站運作，例如判斷最佳網站解像度，得知最多人瀏覽的網頁等。本公司不會，並且無意，使用到訪人士的資料作識辨身份的用途。請注意大多數的瀏覽器都是預設定為接受 cookies 的。閣下可以選擇不接受 cookies 檔案繼續瀏覽本公司網站；但閣下若不接受的話，本網站內某些功能將不能正常運作。

**9. 個人資料的保安及保存**

本公司已實施內部監控措施，確保個人資料的保安，以防止個人資料在未經授權或意外的情況下被查閱、處理、刪除、喪失或使用。閣下所提供的個人資料，將被保留至完成收集資料的擬定用途，一般為期不會多於七年，或為按照適用法律、規則及規例以及由監管機構所發出並適用於本公司的指引、執業通告、操守守則及執業指引所規定的較長期限。

**10. 查閱及改正個人資料**

根據該條例，客戶有權查閱及／或改正其個人資料。據此，客戶可隨時致函 [dpo@midlandwealth.com](mailto:dpo@midlandwealth.com) 或香港九龍旺角亞皆老街 33 號美聯金融大廈 14 樓予本公司之「資料保障主任」。根據該條例，本公司有權就處理客戶查閱其個人資料的要求收取合理的費用。

**11. 查詢**

所有有關本聲明或個人資料的查詢，請致函 [dpo@midlandwealth.com](mailto:dpo@midlandwealth.com) 或香港九龍旺角亞皆老街 33 號美聯金融大廈 14 樓予本公司之「資料保障主任」。

本公司保留更改本聲明及／或其任何部分的權利。

**Privacy Policy Statement (this “Statement”)  
Midland Wealth Management Limited (the “Company”)**

**1. General**

The Company is committed to protecting the personal data of individuals and therefore it is the Company’s policy to ensure its policies and practices in relation to the collection, use, transfer, retention and access of personal data comply with the requirements of the Personal Data (Privacy) Ordinance, Cap.486 (the “Ordinance”).

**2. Types of Personal Data Collected**

For the purpose of provision of wealth management and financial planning services by the Company, clients may be requested to provide personal data including but not limited to the name, contact details (including but not limited to telephone number, fax number, email and/or correspondence address), identification document number and copy of any document which may contain the personal data of the clients, such as identity card, passport, bank statements and utility bills. Provision of personal data is on a voluntary basis. Failure to supply such personal data may result in the Company being unable to provide wealth management and financial planning services.

**3. Use of Personal Data**

The personal data provided by the clients may be used by the Company for the purpose of:

- (a) provision of wealth management and financial planning services;
- (b) direct marketing of the wealth management and financial planning services of the Company;
- (c) direct marketing of the services, reward and/or promotional programmes and/or events provided by the institutions or individuals listed in paragraph 6 below (the “Third Parties”) in relation to the classes of marketing subjects specified in paragraph 5 below (the “Services”);
- (d) compliance with the applicable laws, rules and regulations as well as the guidelines, practice circulars, code of ethics and practice directions issued by the regulatory authorities and applicable to the Company;
- (e) collection of outstanding debts from clients; and/or
- (f) legal proceedings and/or enforcement of judgments and/or orders.

**4. Use of Personal Data for Direct Marketing**

The Company intends to use the name and contact details (including telephone number, fax number, email and/or correspondence address) of the clients for direct marketing of the wealth management and financial planning services provided by the Company.

**5. Transfer of Personal Data for Direct Marketing**

The Company intends to transfer the name and contact details (including telephone number, fax number, email and/or correspondence address) of the clients to the Third Parties for use in direct marketing of the following Services and the Company may derive gain as such:

- (a) real estate agency;
- (b) financial planning;
- (c) wealth management;
- (d) insurance;
- (e) property valuation;
- (f) mortgage referral;
- (g) immigration consultancy;
- (h) banking;
- (i) legal services; and/or
- (j) reward and/or promotional programmes and/or events.

**6. Transfer of Personal Data**

Personal data of clients held by the Company may be transferred to the following parties:

- (a) co-operative estate agents;
- (b) service providers of the Company offering rewards and/or promotions;
- (c) law firms, banks, financial institutions, insurers, service providers for mortgage referral, financial planning, property valuation, immigration consultancy and/or wealth management;
- (d) government agencies, regulatory bodies and/or other lawful authorities;
- (e) courts, tribunals and/or parties to the legal proceedings; and/or
- (f) debt collection agencies.

**7. Request to Cease the Use of Personal Data for Direct Marketing**

Even if clients have given consent to the Company on the use and/or transfer to the Third Parties of their personal data for direct marketing, clients may still have the right, at any time without charge, to request the Company to cease to use and/or transfer their personal data to the Third Parties for direct marketing. Customer may write to the Data Protection Officer of the Company at [dpo@midlandwealth.com](mailto:dpo@midlandwealth.com) or 14/F, Midland Financial Building, 33 Argyle Street, Mongkok, Kowloon, Hong Kong for making such request. The Company will cease using their personal data for such purpose.

**8. Web Logs**

When you visit the Company’s website, the Company’s webserver makes a record of your visit that includes your source IP address, access time, URL, browser type and your device type (webserver access log). The Company uses the webserver access log for the purpose of maintaining and improving the Company’s website such as to determine the optimal screen resolution, which pages have been most frequently visited etc. The Company does not use, and has no intention to use the visitor data to personally identify anyone. Most web browsers are initially set up to accept cookies. You have a choice not to accept the cookies and continue to browse the Company’s website, but if you do, certain functionality may not be available.

**9. Security and Retention of Personal Data**

The Company has implemented internal control measures to ensure the security of personal data and to prevent unauthorized or accidental access, process, erasure, loss or use of personal data. Personal data provided by you are retained until the completion of the purposes for which such data were collected and will not exceed 7 years in general, or such longer period as prescribed by applicable laws, rules and regulations as well as guidelines, practice circulars, code of ethics and practice directions issued by the regulatory authorities and applicable to the Company.

**10. Access to and Correction of Personal Data**

Under the Ordinance, clients have the right to access and/or correct their personal data. Accordingly, clients may at any time write to the Data Protection Officer of the Company at [dpo@midlandwealth.com](mailto:dpo@midlandwealth.com) or 14/F, Midland Financial Building, 33 Argyle Street, Mongkok, Kowloon, Hong Kong. In accordance with the Ordinance, the Company has the right to charge a reasonable fee for the processing of any data access request.

**11. Enquiries**

All enquiries about this statement or personal data shall be addressed in writing to the Data Protection Officer of the Company at [dpo@midlandwealth.com](mailto:dpo@midlandwealth.com) or 14/F, Midland Financial Building, 33 Argyle Street, Mongkok, Kowloon, Hong Kong.

The Company reserves the right to change this Statement and/or any part thereof.