

Personal Information Collection Statement for OristaPay Affiliate Programme

This Personal Information Collection Statement, including its appendix, (the "**PICS**") should be read together with our Privacy Policy Statement, which sets out the privacy policies and practices applicable to our group companies including RD Escrow Limited and its successors and assigns (collectively, "**RD Technologies**" and "**we**", "**our**" or "**us**" shall be construed accordingly) in relation to the personal data we handle.

1 Collection of Data

- (a) We may collect the personal data of individuals ("**you**" or "**your**") in connection with the affiliate programme hosted by RD Escrow Limited ("**OristaPay Affiliate Programme**"), pursuant to which you will refer corporate or business entities to our end-to-end payment platform ("**OristaPay**"), for the purposes set out in this PICS.
- (b) In this PICS, "**personal data**" means any data (i) relating directly or indirectly to a living individual (which may include sensitive data such as biometric data, IP addresses and real time location), (ii) from which it is practicable for the identity of the individual to be directly or indirectly ascertained; and (iii) in a form in which access to or processing of the data is practicable.
- (c) We may collect and process some or all of the following personal data about you, including but not limited to:-
 - (i) *your personal information*: this includes personal information that you provide to us when you apply to subscribe to and participate in the OristaPay Affiliate Programme, such as your name, age, date of birth, identity card number, nationality, area of residence, passport number and social media;
 - (ii) *your contact information*: this includes telephone numbers, addresses and email addresses;
 - (iii) *your business information*: this includes your business name, business title, and your business contact information; and
 - (iv) *your payment and account details*: this includes information in respect of your bank accounts and other means of receiving payment, such as name of account holder and account number.
- (d) Your personal data is required for your application to subscribe to, and participation in, the OristaPay Affiliate Programme. If the personal data requested by us is not provided, you may be unable to subscribe to or participate fully in the OristaPay Affiliate Programme.
- (e) Your personal data may be:
 - (i) collected from you directly, from someone acting on your behalf or from another source (including public sources or third parties that you have authorised to share your data with us); and
 - (ii) combined with other data available to members of the "**Group**", meaning us and all of our holding companies, subsidiaries, joint ventures and associated entities, and a "**member**" of the Group shall be construed accordingly.

2 Use of Personal Data

- (a) We will use personal data for one or more of the following purposes:

- (i) processing applications for subscription to and operation of the OristaPay Affiliate Programme;
- (ii) payment of incentive for referring corporates or business entities to create an OristaPay account under the OristaPay Affiliate Programme;
- (iii) identifying and verifying the information of you as a participant of the OristaPay Affiliate Programme;
- (iv) detecting, preventing and investigating crime and safeguarding public interest;
- (v) exercising, enforcing and defending our rights and those of the Group, whether contractual, tortious or otherwise;
- (vi) meeting our obligations, requirements or arrangements or those of any member of the Group, whether compulsory or voluntary, to comply with or in connection with any applicable law or regulation, judgment, court order, sanctions regime, demand or request from any legal, regulatory, governmental or other authorities;
- (vii) complying with any obligations, requirements, policies, procedures, measures or arrangements for sharing personal data and information within the Group;
- (viii) communicating with you; and
- (ix) any other purposes relating or incidental to the purposes listed above.

3 Disclosure of Personal Data

- (a) Personal data held by us will be kept confidential but we may provide personal data to the following parties or any of them for the purposes set out in paragraph 2(a) above (the "**Transferee(s)**") where necessary:
 - (i) any member of the Group which has undertaken to keep such personal data confidential;
 - (ii) any counterparties, agents, contractors, sub-contractors or associates of us or the Group (as well as their respective, employees, officers, agents, contractors, service providers and professional advisers);
 - (iii) any third party service providers providing services to us or any member of the Group to support our business operation;
 - (iv) any local or foreign legal, regulatory, judicial, administrative, public or law enforcement body, or governmental or other authorities with jurisdiction over all or any part of the Group;
 - (v) any persons acting on your behalf whose personal data are provided;
 - (vi) any persons to whom we are or any member of the Group is under an obligation or required or expected to make disclosure for the purposes set out in, or in connection with, paragraphs 2(a)(vi) above; and
 - (vii) business partners of ours, external services providers or any member of the Group for marketing, joint-marketing and research purposes.
- (b) Such data may be transferred in and to a place outside Hong Kong, including jurisdictions with a lower level of data protection. Where we do so, we will take reasonably practicable steps to ensure that your personal data is handled in a manner that is in compliance with the Personal Data (Privacy) Ordinance (Cap. 486 of the Laws of Hong Kong) and other applicable laws.

4 Use of Personal Data in Direct Marketing

- (a) We intend to use your personal data in direct marketing and we require your consent (which includes an indication of no objection) for that purpose. Please note that:
 - (i) your name, contact details, location data, financial background and demographic data held by us from time to time may be used for marketing our own, other Group members' and/or our business partners' products and services to you by email, letter, telephone,

- text messages or mobile application and/or online platforms (e.g. targeted advertisements in-App, via browser and via WeChat push);
- (ii) the following classes of products, services and subjects may be marketed:
 - (1) payment, financial, banking and related products and services;
 - (2) reward, loyalty, co-branding or privileges programmes and related products and services;
 - (3) financial or banking products and services offered by our business partners; and
 - (4) donations and contributions for charitable and/or non-profit making purposes;
- (iii) the above products, services and subjects in sub-clause (a) **Error! Reference source not found.** may be provided by or (in the case of donations and contributions) solicited by us and/or:
 - (1) any member of the Group or any agent or contractor engaged by the Group;
 - (2) marketing or research services providers of us or any member of the Group;
 - (3) business partners of us or any member of the Group (such as third party financial institutions and third party reward, loyalty, co-branding or privileges programme providers); and
 - (4) charitable or non-profit making organisations;
- (iv) in addition to marketing the above products, services and subjects ourselves, we may provide the personal data described in paragraph 4(a)(i) above to all or any of the persons described in paragraph 4(a)(iii) above for use by them in marketing those products, services and subjects; and
- (v) we may receive money or other property in return for providing the personal data to the other persons in paragraph 4(a)(iv) above.

(b) If you agree to receive marketing communication but do not wish to receive them in the future, you may opt out of receiving them at any time, free of charge, by the following applicable means:-

- (i) following the unsubscribe instructions contained in the marketing text message;
- (ii) following the unsubscribe instructions or hyperlink in the marketing email;
- (iii) notifying us that you no longer wish to receive marketing communication when receiving our marketing calls; or
- (iv) contacting us at the address stated in paragraph 6(c) below to tell us that you no longer wish to receive marketing communication through any channel.

5 Provision of Another Person's Personal Data

Where you provide to us personal data about another person, you must give to that person a copy of this PICS and, in particular, tell him/her that you have provided us with their personal data and how we may use his/her personal data.

6 Data Access Requests

- (a) Apart from the right to opt out of direct marketing as mentioned above, you have the right:
 - (i) to check whether we hold personal data about you and to access such personal data;
 - (ii) to require us to correct any personal data relating to you which is inaccurate; and
 - (iii) to ascertain our policies and practices in relation to personal data and to be informed of the kind of personal data held by us.
- (b) In accordance with the provisions of the Personal Data (Privacy) Ordinance (Cap. 486 of the Laws of Hong Kong), we have the right to charge a reasonable fee for the processing of any personal data access request.

(c) You should send requests for access to personal data or correction of personal data or for information regarding policies and practices and kinds of personal data held, by way of (i) completing an enquiry form on our website, or (ii) writing by post or email to:

The Data Protection Officer
RD Technologies
Address: Units 2801-05A, Level 28,
K11 Atelier King's Road,
728 King's Road,
Quarry Bay,
Hong Kong
Email: care@rd.group

(d) We will endeavour to use appropriate technical means to ensure that you can access, update and correct your personal data. In accessing, updating, correcting and/or deleting your personal data, we may ask for you to authenticate your identity in order to protect the security of your personal data.

(e) To the extent permitted by relevant laws and regulations, we reserve the right to refuse unreasonable requests (for example, requests which may infringe or conflict with the privacy of others).

(f) Nothing in this PICS shall limit your rights as a data subject under the Personal Data (Privacy) Ordinance (Cap. 486 of the Laws of Hong Kong).

(g) Please contact us if you have any queries about this PICS.

(h) In case of discrepancies between the English and Chinese versions of this PICS, the English version shall apply and prevail.

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