

Personal Information Collection Statement for the RD InnoVest Services

This notice, including its appendix/appendices, (the "**Notice**") should be read together with our Privacy Policy Statement, which sets out the privacy policies and practices applicable to our group companies including RD InnoVest Limited ("**RD InnoVest**") and its respective successors and assigns (collectively, "**RD Technologies**" and "**we**", "**our**" or "**us**" shall be construed accordingly) in relation to the Personal Data (as defined under paragraph 1(c)) we handle.

1 Collection of Data

- (a) We may collect the Personal Data of individuals ("**you**" or "**your**") in connection with the provision of RD InnoVest Services (as defined below) and for the purposes set out in this Notice. "**RD InnoVest Services**" means both new and existing services, facilities, products, website(s), mobile application(s), activities, marketing events and other events hosted, provided or made available by RD InnoVest from time to time in relation to the accounts (relating to you as described under paragraph 1(b)(i) to 1(b)(v) herein) with us and the products and services described in the RD InnoVest Client Agreement, including without limitation to (i) dealing in and advising on stablecoins and SFC-approved investment products relating to virtual assets ("**VA**"); (ii) leveraging SFC-licensed VA trading platforms; and (iii) any other ancillary services offered by RD Technologies from time to time.
- (b) You may be users of our RD InnoVest Services, including individuals relating to our business customers (financial institutions ("**FI**") and corporate professional investors) or business applicants applying for our RD InnoVest Services (each a "**Business**"), including but not limited to:
- (i) the sole proprietor, managers, employees, agents and officers of a sole proprietorship;
 - (ii) the shareholders, beneficial owners, directors, managers, employees, agents and officers of a corporation;
 - (iii) in the case where such person linked to a Business that is a trust, the trustees, settlors, protectors and beneficiaries of the trust;
 - (iv) in the case where such person linked to a Business that is a partnership, the partners of the partnership and members; and
 - (v) other persons who are related to the above Business or relevant to their relationship with us.

In this Notice, a "**Relevant Entity**" refers to each Business customer or Business applicant to which you are linked or related.

- (c) In this Notice, "**Personal Data**" means any data (i) relating directly or indirectly to a living individual (which includes 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.
- (d) We may collect and process some or all of the following Personal Data about you:-
- (i) *your personal information*: this includes personal information that you provide to us when you or your Relevant Entity applies for an account to use or use our RD InnoVest Services, such as your name, age, date of birth, identity card number, nationality, passport number;

- (ii) *your contact information*: this includes telephone numbers, addresses, mailing addresses, WhatsApp, WeChat and other instant messaging account information, email addresses and fax numbers;
 - (iii) *your business information*: this includes your business name, business title, and your business contact information;
 - (iv) *your photographs and videos*: this includes your facial images and videos being collected for customer due diligence purposes and other client onboarding purposes;
 - (v) *your interest and preferences*: this includes your interests, personal preferences, comments and habits;
 - (vi) *survey and marketing information*: this includes your comments and responses to market surveys, contests and promotional offers conducted by us, in conjunction with us or on our behalf; and
 - (vii) *technical information*: this includes details of (i) your device particulars (including IMSI, IMEI, SEID and other phone numbers and information), and (ii) your visits to our websites, web portal, mobile application or social media platforms collected through cookies or other tracking technologies such as online behavioural information, browser details, IP addresses and location information.
- (e) Your Personal Data is required for access to and use of our RD InnoVest Services. If the Personal Data requested by us is not provided, we may be unable to provide (or continue to provide) our RD InnoVest Services to you or the Relevant Entity(ies), or, even if we continue to provide you with a certain level of access to our services, the experience or quality may not be optimal.
- (f) Your Personal Data may be:
- (i) collected from you directly, from the Relevant Entity(ies), from someone acting on your behalf or from another source;
 - (ii) linked to or combined with data relating to the Relevant Entity(ies), if your data is linked to a Relevant Entity(ies); and
 - (iii) 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

We will use Personal Data for one or more of the following purposes (which may vary depending on the nature of your relationship with us):

- (i) processing applications for, and the daily operation of, our RD InnoVest Services;
- (ii) identifying and verifying the information of, and conducting client due diligence, anti-money laundering, fraud detection and transaction monitoring procedures on you and/or the Relevant Entity(ies);
- (iii) creating and maintaining our risk related models;
- (iv) designing, maintaining, supporting and enhancing our RD InnoVest Services, whether for your operation or the use of the Relevant Entity(ies);
- (v) conducting analysis, research and profiling to better understand your and the Relevant Entity's needs, preferences, interests, experiences and habits;
- (vi) detecting, preventing and investigating crime and safeguarding public interest;
- (vii) exercising, enforcing and defending our rights and those of the Group, whether contractual, tortious or otherwise;
- (viii) satisfying any operational, administrative and risk management requirements of our third party service providers;

- (ix) 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;
- (x) complying with any obligations, requirements, policies, procedures, measures or arrangements for sharing Personal Data and information within the Group;
- (xi) enabling actual or proposed assignee(s) of all or any part of our business and/or assets, or participant(s) or sub-participant(s) of our rights in respect of you to evaluate the transaction intended to be the subject of the assignment, participation or sub-participation and enabling the actual assignee(s) to use your Personal Data in the operation of the business or rights assigned;
- (xii) communicating with you and/or the Relevant Entity(ies); and
- (xiii) 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 (whether in identifiable, unaggregated, aggregated, verified, unverified or anonymised form) to the following parties or any of them for the purposes set out in paragraph 2 above (the "**Transferee(s)**"):
 - (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 who provide administrative, marketing, customer due diligence, anti-money laundering, sanction compliance, name screening, know-your-transaction, fraud prevention, risks management, security, cryptography, distribution, data processing, communications, computer, payment, virtual account, information technology, blockchain analytics, electronic data storage, or other services to us or any member of the Group, including any person taking over or may take over all or part of our rights or obligations under the terms governing the aforesaid services or such person where such terms (or any part of it) is transferred to or may be transferred to;
 - (iv) any FI for the purposes of anti-money laundering related checks, fraud prevention and detection of crime;
 - (v) any local or foreign legal, regulatory, judicial, administrative, public or law enforcement body, or governmental, quasi-governmental, finance, tax, revenue, monetary, securities or futures exchange, court, central bank, agency, department or other authorities, or self-regulatory or industry bodies or associations of financial service providers or any of their agents with jurisdiction over all or any part of the Group (including the Payment & Clearing Association of China) or in any jurisdiction in so far as we need to do so to keep the relevant laws and regulations or any order, directive or request which we are required to keep to;
 - (vi) any persons acting on your or the Relevant Entity's behalf whose Personal Data are provided, payment recipients, beneficiaries, intermediaries, correspondent and agent banks, clearing or settlement systems, market counterparties, upstream withholding agents, or any persons making any payment into a customer's account;
 - (vii) in the event of payment collection, debt recovery or default, debt collection agencies;
 - (viii) 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(viii) or 2(ix) above;

- (ix) any actual or proposed assignee(s) of ours or participant(s) or sub-participant(s) or transferee(s) of our rights in respect of you or the Relevant Entity(ies);
 - (x) business partners of ours, external services providers or any member of the Group for marketing, joint-marketing and research purposes, including the purposes set out in paragraphs 2(iv) and 2(v) above; and
 - (xi) a merchant or a member of a card association where the disclosure is in connection with use of a card.
- (b) Such data may be transferred in and to a place outside Hong Kong, including jurisdictions with a lower level of data protection.

4 Biometric Data

- (a) You should be aware that biometric data (which constitutes Personal Data) can be sensitive as it often contains an individual's physiological data with which an individual is born with (such as facial images) and behavioural data developed by such individual after birth (such as typing rhythm and voice pattern).
- (b) Biometric data is not legally classified or categorised separately from Personal Data, but there are a few particular points regarding biometric data that we would like to bring to your attention:
- (i) provision of your biometric data is not obligatory. If you do not want to provide your biometric data to us, you are free to do so, but that will mean that we may be unable to provide all or any part of our RD InnoVest Services to you and/or the Relevant Entity(ies);
 - (ii) your biometric data will be used primarily for the purposes set out in paragraph 2(ii) above;
 - (iii) your biometric data will in most cases be disclosed to the Transferees described in paragraphs 3(a)(iii) to 3(a)(v) only;
 - (iv) your biometric data may be relied upon by the relevant Transferees to take adverse actions against you, but you have the right to explain any irregularities concerning your biometric data before they do so;
 - (v) your right to request access to or correct your biometric data is set out in paragraph 7 below;
 - (vi) our collection and processing of biometric data is central to our and the relevant Transferees' client identification, client verification and anti-money laundering efforts;
 - (vii) a leak of biometric data could be very serious, but we will use all commercially reasonable efforts to ensure the security and integrity of your biometric data. Please refer to our Privacy Policy Statement for more information regarding our security practices; and
 - (viii) automated decision-making tools will be used in conjunction with biometric systems. These tools will automatically attempt to match your biometric data with other information regarding your identity. If the matching process fails, you will not pass our client identification and verification measures. You have the option of seeking human intervention by contacting us through any of the methods set out in paragraph 7(c).

5 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, relationship with relevant individuals and relevant entities, 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 (e.g. targeted advertisements in-App and via WeChat push).

- (ii) the following classes of products, services and subjects may be marketed:
 - (1) payment, financial, banking, digital assets and related products and services;
 - (2) reward, loyalty, co-branding or privileges programmes and related products and services;
 - (3) financial, banking or digital assets 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)(ii) 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 FI 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 5(a)(i) above to all or any of the persons described in paragraph 5(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 5(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 7(c) below to tell us that you no longer wish to receive marketing communication through any channel.

6 Provision of Another Person's Personal Data

Where you provide to us Personal Data about another person (e.g. an individual, or a shareholder or director of your company), you must give to that person a copy of this Notice and, in particular, tell him/her that you have provided us with their Personal Data and how we may use his/her Personal Data.

7 Data Access Requests

- (a) 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;
 - (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; and
 - (iv) be informed on request which items of Personal Data are routinely disclosed to debt collection agencies and be provided with further information to enable the making of an access and correction request to the relevant debt collection agency.

- (b) In accordance with the provisions of the Personal Data (Privacy) Ordinance, 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, (ii) messaging us using the messaging function in our mobile application or web portal, or (iii) 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: wealth.mgt@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 safety 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 Notice shall limit your rights as a data subject under the Personal Data (Privacy) Ordinance.
- (g) Please contact us if you have any queries about this Notice.
- (h) In case of discrepancies between the English and Chinese versions, the English version shall apply and prevail.

8 Direct Marketing Consent

If you wish to amend your choice in relation to receipt of the latest promotion offers, services and product information of RD Technologies (including RD InnoVest Limited and any member of our Group) and/or our business partners as set out in paragraph 5 of this Notice, please visit the setting page in our web portal or mobile application to enable or disable the feature. You can change your decision at any time and at no cost. You can indicate the objection to the use of your Personal Data for direct marketing by disabling such feature on our mobile application. By enabling such feature and selecting one or both channels of communication, you do not object to the use of your Personal Data for direct marketing in accordance with paragraph 5 of this Notice.

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