

## Personal Information Collection Statement

### SECURITY AND DISCLOSURE

Rakuten Securities HK respects each individual's right to privacy. We value our relationship with you, and we take pride in maintaining loyalty and respect with each individual client; all personal information collected by Rakuten Securities HK is protected under stringent security measures. The provisions of this notice apply to former clients, current clients, and applicants.

### PERSONAL INFORMATION

When you apply for and/or maintain a live or demo account with Rakuten Securities HK or contact Rakuten Securities HK for any inquiries, Rakuten Securities HK collects personal information, including your name, contact details and other personal particulars for the following purposes, such as evaluating your financial needs, processing your requests and transactions, informing you about investment products and services and providing customer service. The types of personal information may include:

- Application information. Information you provide to us on applications and other forms, such as your name, address, birth date, identification card number, occupation, assets, and financials.
- Transaction information. Information about your transactions as well as information about our communications with you. Examples include your account balances, trading activity, your inquiries, and our responses.
- Verification information. Information necessary to verify your identity, such as a passport or driving license. Additional examples also include background information we receive from public records or from other entities not affiliated with Rakuten Securities HK. Rakuten Securities HK may also be required to collect your information and take actions necessary to verify your identity in accordance with regulatory requirements.

Rakuten Securities HK or Rakuten Group<sup>^</sup> intends to use your name, telephone number and email address for direct marketing investment products and services and Rakuten Securities HK requires your consent for that purpose. By applying for and/or opening a live or demo Rakuten Securities HK account, you acknowledge and agree that your consent is voluntarily provided to Rakuten Securities HK. If you do not wish Rakuten Securities HK to use your data for use in direct marketing as described in this policy, you may exercise your right to opt-out by notifying Rakuten Securities HK.

In compliance with the Personal Data (Privacy) Ordinance, Rakuten Securities HK would like to inform you that your personal information may be used for the following purposes:

1. Sharing, cross-checking and transferring that personal data with any Rakuten Securities HK's affiliated or associated companies or Rakuten Group or iSAM Securities\* whether in relation to new or existing client verification procedures, ongoing account administration or direct or indirect marketing of any investment, dealing or related services or products;
2. The comparison and or transfer to third party service providers of such personal data for the purposes of credit checking and or data verification;
3. Any purpose relating to or in connection with the compliance of any law, regulation, court order or order of a regulatory authority, including the provision of any such data to any such regulatory authority as required by law or regulation;

4. Any other purpose relating to or in connection with Rakuten Securities HK's business or dealings or the business or dealing of Rakuten Securities HK's affiliated or associated company or any member of Rakuten Group or iSAM Securities.

Your personal data held by Rakuten Securities HK will be kept confidential but Rakuten Securities HK's affiliated or associated company or Rakuten Group or iSAM Securities may provide information to 1) any agent or third party services provider who provides services to any of Rakuten Securities HK's affiliated or associated companies or Rakuten Group or iSAM Securities in connection with the operation of its business 2) any regulatory or governmental authorities which relates to or govern any business of any of Rakuten Securities HK's affiliated or associated companies or Rakuten Group or iSAM Securities and 3) any person that Rakuten Securities HK considers as appropriate or fit including any of Rakuten Securities HK's affiliated or associated companies or a member of Rakuten Group or iSAM Securities or a member and its employees under a duty of confidentiality. Your personal data may be transferred to a place outside Hong Kong where it may not have protection to the same or similar level in Hong Kong.

In accordance with the terms of the Personal Data (Privacy) Ordinance, any client has the right:

- To determine whether Rakuten Securities HK holds data about that client and of access to such data;
- To request Rakuten Securities HK correct any inaccurate data relating to the client;
- To ascertain Rakuten Securities HK's policies and practices in relation to data and be informed of the kind of personal data held by any of Rakuten Securities HK's affiliated or associated companies or Rakuten Group or iSAM Securities;
- To request Rakuten Securities HK or its affiliated or associated companies or Rakuten Group or iSAM Securities to cease from using his/her personal data for direct or indirect marketing purpose by writing.

Rakuten Securities HK has the right to charge a reasonable fee for the processing of any data access request in accordance with the terms of the Personal Data (Privacy) Ordinance. Requests for access to data or correction of data or for information regarding Rakuten Securities HK's privacy policy and practices should be addressed to the following:

The Data Protection Officer, Unit 501, 5/F, Nexxus Building, 41 Connaught Road Central, Hong Kong  
Telephone: (852) 2119-0116 Fax: (852) 2119-0117

You are not required to supply any of the personal information that we may request. However, failure to provide all required information may prevent us from opening and/or maintaining your account or providing services to you. While we make every effort to ensure that all information we hold about you is accurate, complete, and up to date, you can help us considerably in this regard by promptly notifying us if there are any changes to your personal information.

## ABOUT COOKIES

### Introduction

Rakuten Securities Hong Kong Limited ("Rakuten Securities HK") may use cookies when you visit our website the sec.rakuten.com.hk domain (the "Website") including any other media form, the mobile website to help customize the Website and improve your experience. By using the Website, you consent to our use of cookies according to this Cookies Policy. If you refuse to accept cookies, please refer to Managing Cookies below.

We reserve the right to make any changes to this Cookies Policy at any time and for any reason. All modifications will be effective immediately upon posting the updated Cookies Policy on the Website, and

you waive the right to receive specific notice of each modification. You will be deemed to have been made aware of, will be subject to, and will be deemed to have accepted the modification in any revised Cookies Policy by your continued use of the Website after the date such revised Cookies Policy is posted.

What are cookies?

Cookies are small text files that assign you a unique identifier that usually we store on your computer and/or mobile devices. Cookies are used to recognize visitors each time they submit a query to the Website. Rakuten Securities HK and/or Rakuten Group may use Cookies to personalize users' preference when they return to the Website, deliver and tailor the marketing and advertising, and improve the users' experience on the Website and the services we provided. Such information that we collect and share would be anonymous and not personally identifiable.

Use of cookies

The Website uses cookies served by third parties on our behalf. The table below describes what cookies are used:

Service	Purpose	More Information
Google Analytics	These cookies are used to collect information about how visitors use the Website anonymously. We use the information to compile reports and to help us improve the Website.	<a href="#">Google privacy information</a>
Google reCAPTCHA	These cookies are used to collect information to protect our Website from spam software and non-human visitors.	<a href="#">Google privacy information</a>

Managing cookies

If you do not agree to the use of cookies, you can clear all the cookies on your devices (i.e. computer and mobile device). You can also disable cookies by changing the setting within your browser. Please note that if cookies are disabled, you may experience reduced functionality or will be prevented from using this Website. For details, please visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

Contact us

If you have any questions or comments about this Cookies Policy, please contact us directly. Please find our contact information on our Website.

## SECURITY TECHNOLOGY

Rakuten Securities HK uses Secure Socket Layer (SSL) encryption technology in order to protect certain information that you submit. This type of technology protects you from having your information intercepted by anyone other than Rakuten Securities HK while it is being transmitted to us. We work hard to ensure that our Web sites are secure and that they meet industry standards. Rakuten Securities HK also uses other safeguards such as firewalls, authentication systems (e.g., passwords and personal identification numbers), and access control mechanisms to control unauthorized access to systems and data.

## SHARING INFORMATION WITH OUR AFFILIATES

Rakuten Securities HK may share personal information described above with our affiliates or Rakuten Group for business purposes, such as, but not limited to, servicing customer accounts and informing customers about new investment products and services, or to aid in the trading activity of the company, its affiliates, or employees, and as permitted by applicable law. Our affiliates may include companies controlled or owned by us as well as companies that have an ownership interest in our company. The information we share with affiliates or Rakuten Group may include any of the information described above, such as your name, address, transaction and account information. Our affiliates or Rakuten Group maintain the privacy of your information to the same extent Rakuten Securities HK does in accordance with this Policy.

If you do not wish to have your personal information disclosed to our affiliates or other third parties as described in this Policy, please contact us via e-mail at: [compliance@sec.rakuten.com.hk](mailto:compliance@sec.rakuten.com.hk), or send your request to:

**Rakuten Securities Hong Kong Limited**

Attention: Compliance Officer

Unit 501, 5/F, Nexus Building, 41 Connaught Road Central, Hong Kong

Hong Kong

**SHARING INFORMATION WITH THIRD PARTIES**

Rakuten Securities HK does not disclose your personal information to third parties, except as described in this Policy. Third party disclosures may include sharing such information with non-affiliated companies that perform support services for your account or facilitate your transactions with Rakuten Securities HK, including Rakuten Group or iSAM Securities and those that provide professional, legal, or accounting advice to Rakuten Securities HK. Non-affiliated companies that assist Rakuten Securities HK in providing services to you are required to maintain the confidentiality of such information to the extent they receive it and to use your personal information only in the course of providing such services and only for the purposes that Rakuten Securities HK describes in this policy.

We may also disclose your personal information to third parties to fulfill your instructions or pursuant to your expressed consent.

We want you to know that Rakuten Securities HK will not sell your personal information.

**REGULATORY DISCLOSURE**

Under limited circumstances, Rakuten Securities HK may disclose your personal information to third parties as permitted by, or to comply with, applicable laws and regulations. For example, we may disclose personal information to cooperate with regulatory authorities and law enforcement agencies to comply with subpoenas or other official requests, and as necessary to protect our rights or property. Except as described in this privacy policy, we will not use your personal information for any other purpose, unless we describe how such information will be used at the time you disclose it to us or we obtain your permission.

**^RAKUTEN GROUP**

Rakuten Group, Inc., a publicly traded company listed on the Tokyo Stock Exchange (TOKYO: 4755), and its consolidated subsidiaries. Rakuten Securities HK is a wholly owned subsidiary of Rakuten Securities, Inc., a member company of Rakuten Group.

\*iSAM Securities: Refers to iSAM Securities Limited incorporated in Cayman Islands and its subsidiaries iSAM Securities (UK) Limited, iSAM Securities (USA) Inc, iSAM Securities (HK) Limited.