

Client Data Policy for all clients of the Oriental Patron Financial Group (Client Data Policy)

Oriental Patron Financial Group* ("Oriental Patron") wants to provide the best service possible to Oriental Patron's clients. One way that Oriental Patron does this is by using client information to provide Oriental Patron's clients with convenient access to the right products and services. Oriental Patron also recognizes that Oriental Patron's clients have important expectations regarding the use of that information. Safeguarding client information is a matter that Oriental Patron takes seriously. That is why Oriental Patron has set forth the following principles to affirm Oriental Patron's long-standing commitment to confidentiality:

- From time to time, it is necessary for clients who are individuals to supply Oriental Patron with data which are personal data ("Data") for the purposes of the Personal Data (Privacy) Ordinance (Cap. 486 of the laws of Hong Kong). The purposes for which Data (and other information) relating to clients may be used are as follows:
 - ◇ the daily operation of the services and facilities provided to clients;
 - ◇ conducting credit checks;
 - ◇ assisting other institutions to conduct credit checks;
 - ◇ ensuring clients' ongoing credit worthiness;
 - ◇ designing financial services or related products for clients' use;
 - ◇ marketing financial services or related products to clients;
 - ◇ determining the amount of indebtedness owed to or by clients;
 - ◇ meeting the requirements to make disclosure under the requirements of any law or regulations; and
 - ◇ any purposes relating to any of the foregoing.
- Data (and other information) held by Oriental Patron relating to clients will be kept confidential but Oriental Patron may disclose, and it is a condition of Oriental Patron providing services, products and information to clients that each client consents to the disclosure of, all Data (and other information) to:
 - ◇ any officer, employee, agent, contractor or third party who provides administrative, credit information, debt collection, telecommunications, computer, payment or other services to Oriental Patron in connection with the operation of their business;
 - ◇ any financial institution with which the client has or proposes to have dealings;
 - ◇ regulatory authorities and other relevant government bodies;
 - ◇ any other person under a duty of confidentiality to Oriental Patron including a company within Oriental Patron which has undertaken to keep such information confidential;
 - ◇ Oriental Patron shares information regarding clients among Oriental Patron only in accordance with strict internal security standards and confidentiality policies and with applicable law;
 - ◇ Oriental Patron holds Oriental Patron's employees fully accountable for adhering to those standards, policies and laws;
 - ◇ Oriental Patron does not share information about Oriental Patron's clients with other companies except in order to conduct Oriental Patron's business, comply with applicable law, protect against fraud or make available special offers of products and services that Oriental Patron feel may be of interest to Oriental Patron's clients;
 - ◇ Oriental Patron may also provide information to regulatory authorities and law enforcement officials in accordance with applicable law; and
 - ◇ Oriental Patron has established high standards for protecting information regarding Oriental Patron's clients from unauthorized alteration or destruction.

Oriental Patron may, in accordance with the Personal Data (Privacy) Ordinance and any other applicable law:

- match, compare or exchange any Data or other information provided by, or in respect of, a client with Data (or other information) held by Oriental Patron or any other person for the purpose of:
 - ◇ credit checking;
 - ◇ Data (and other information) verification; and
 - ◇ otherwise producing or verifying Data (and other information) which may be used for the purpose of taking adverse action against the client or any other person at any time.
- transfer such Data (and other information) to any place outside Hong Kong (whether for the processing, holding or use of such Data (and other information) outside Hong Kong).

Under and in accordance with the terms of the Personal Data (Privacy) Ordinance each client has a right to:

- check whether Oriental Patron holds Data about the client and the right of access to such Data;
- require Oriental Patron to correct any Data relating to the client which is inaccurate;
- ascertain Oriental Patron's policies and practices in relation to Data and to be informed of the kind of personal data relating to the client held by Oriental Patron; and
- request Oriental Patron to cease using Data about the client for direct marketing purpose.

In accordance with the terms of the Personal Data (Privacy) Ordinance, Oriental Patron has the right to charge a reasonable fee for the processing of any Data access request. At Oriental Patron, information regarding Oriental Patron's clients are used solely in the legitimate conduct of Oriental Patron's business, to deliver superior service and to design products and special offers that demonstrate Oriental Patron's understanding of clients and client's needs. As Oriental Patron move forward in developing new products and services in an era of vast technological change, Oriental Patron will continue to maintain Oriental Patron's dedication to assuring that client information is properly used and appropriately safeguarded.

Requests for access to data or correction of data or for information regarding policies and practices and kinds of data held should be addressed to:

The Data Protection Officer
Oriental Patron Financial Group
27/F, Two Exchange Square, Central, Hong Kong
Facsimile: (852) 2842-5833

May 2011

*Oriental Patron Securities Limited is one of members of the Oriental Patron Financial Group, adopting the Client Data Policy contained herein.