

July 2018

# Charles Schwab, Hong Kong, Ltd. Privacy Policy

## The Schwab Privacy Policy: A Commitment to Your Privacy

*At The Charles Schwab Corporation and its affiliates and subsidiaries, including Charles Schwab, Hong Kong, Ltd. and its clearing broker Charles Schwab & Co., Inc. (together, "Schwab"), our most important asset is our relationship with you. We are honored that you have entrusted us with your financial affairs, and we are committed to protecting the privacy of information we maintain about you. Establishing and adhering to an effective privacy policy, regarding proper handling and use, is an important part of that dedication.*

*Below, you will find details of Schwab's commitment to protecting your privacy, including the types of information we collect about you, how we use and share that information both within and outside the Schwab family of companies, and how you can instruct us to limit certain types of information sharing. Our privacy policy applies to all clients with whom we have a relationship and is also extended to each of our former clients.*

*During the course of our engagement, you may be provided with information relating to our privacy policy, in writing or otherwise. In the event of any inconsistencies and/or discrepancies between the terms of this Account Agreement relating to or in connection with data protection and such other terms and conditions as set out in any other information or documents provided, the terms contained in this Account Agreement prevail.*

### How We Collect Information About You

We collect personal information about you in a number of ways.

- **Application and registration information.** We collect information from you when you open an account or enroll in one of our services. You will also be asked for information when you choose to participate in a Schwab promotion. We may also collect information from consumer reporting agencies to verify your identity in the account-opening process or if you apply for other financial products or services. The information we collect may include personal information such as your name, address, phone number, email address, identity document number and date of birth, as well as details about your interests, investments and investment experience.
- **Transaction and experience information.** Once you have opened an account with us, we collect and maintain personal information about your account activity, including your transactions, balances, positions and history. This information allows us to administer your account and provide the services you have requested.
- **Third-party information providers.** We may collect information about you from information services and consumer reporting agencies to verify your identity, employment or creditworthiness, or to better understand your financial needs.
- **Website usage.** When you visit our website, our systems may use devices known as "cookies," graphic interchange format files (GIFs), or other similar web tools to enhance your web experience. These tools enable us to recognise you when you return to our site and maintain your web session while you browse, as well as help us provide you with a better, more personalised experience at Schwab. To learn more about our policies regarding using our website and the use of web tools, please visit Privacy and Security at [www.schwab.com.hk](http://www.schwab.com.hk).

Failure to supply such personal information may result in us being unable: to approve the opening of or to continue accounts, to establish or continue facilities, to provide related services, or to comply with applicable laws or regulations.

### How We Share and Use Information About You Within the Schwab Family of Companies

The term "Schwab" refers to a family of financial and nonfinancial services companies that are owned by The Charles Schwab Corporation. These companies are often referred to as "affiliates" and include financial companies such as Charles Schwab & Co., Inc.—a broker-dealer and clearing broker for Charles Schwab, Hong

Kong, Ltd.—Charles Schwab, Hong Kong, Ltd., Charles Schwab Bank, Charles Schwab Futures, Inc., Charles Schwab Investment Advisory, Inc. and Charles Schwab Trust Company; and nonfinancial companies such as Schwab Performance Technologies® and Schwab Compliance Technologies, Inc.

Many clients do business with more than one Schwab affiliate, creating an efficient, comprehensive financial relationship to meet individual needs. When appropriate, Schwab may share information we collect about you within our family of companies to:

- help provide you with better service or perform services on our behalf;
- respond to communications from you (or as you authorise or request);
- make it more convenient for you to open a new account.

### How We Share Information About You Outside of the Schwab Family of Companies

We provide access to information about you to outside companies and other third parties in certain limited circumstances, including:

- to help us process transactions for your account;
- when we use another company to provide services for us, such as printing and mailing your account statements;
- when we believe that disclosure is required or permitted under law. For example, we may be required to disclose personal information to cooperate with regulatory or law enforcement authorities, to resolve consumer disputes, to perform credit/authentication checks, or for risk control.

Schwab may also enter into a joint-marketing agreement with another financial institution in order to provide you with a Schwab-branded financial product or service.

You may instruct us **not** to share information about you with outside companies for this purpose, as explained under "How to Limit the Sharing and Use of Information About You."

### Use and Provision of Personal Information for Use in Direct Marketing

Schwab Hong Kong intends, from time to time, to use some of your personal information (including your name, contact details [such as your addresses, phone numbers and email addresses], products and services portfolio information, transaction patterns and behaviour, financial background and account history) for direct marketing to you the following classes of services and products: financial, securities, credit/debit cards, banking and payments, advisory, investment and related services and products; and we may invite you to take part in market research studies or consumer opinion surveys. This may include products and services offered by us or, as appropriate, our affiliates and those financial institutions with whom we have joint-marketing arrangements, whether they are available through us or otherwise. We cannot use your personal information for any of these purposes unless you consent (which includes an indication of no objection) to the intended use. We may also send you materials relating to networking, social, recreational or personal enhancement events or activities organised by us for our clients.

Schwab Hong Kong may provide your personal information as mentioned above, as appropriate, to any members of The Charles Schwab Corporation or those financial institutions with whom we have joint-marketing arrangements for use by them in direct marketing to you the classes of services and products listed above. We cannot provide your personal information to any of those parties for direct marketing unless you consent (which includes an indication of no objection) to that provision of personal information.

We only make such agreements with companies that we believe can help us provide a financial product or service that will benefit you.

You may instruct us not to share information about you with outside companies for this purpose, as explained under “How to Limit the Sharing and Use of Information About You.”

### **How to Limit the Sharing and Use of Information About You**

You may, at any time and without charge, require us to cease (a) the use of your personal information in direct marketing; and/or (b) to provide your personal information, as appropriate, to our affiliates and outside companies for their use in direct marketing (see “Use and Provision of Personal Information for Use in Direct Marketing” above).

Subject to applicable law, you may choose to limit the information we share about you among our affiliates and outside companies for marketing purposes. If you choose to do so, Schwab will not:

- use personal information about you in direct marketing
- share with our affiliates consumer reports and other personal information about you that may be used to determine your eligibility for credit (for example, information about your income, profession or employment status);
- allow our affiliates to market their financial products or services to you based on eligibility information they receive from us;
- share personal information about you with an outside company for joint-marketing purposes.

You may exercise this choice by calling us at **+852-2101-0500**.

- Your choice will be applied to you as an individual and will automatically be extended to your other accounts at Schwab.
- You may make your privacy choice at any time, and it will remain in effect until you tell Schwab to change it.

Except to the extent you request otherwise, Schwab will continue to share information among our affiliates that identifies you (such as your name and identity document number), as well as information about your transactions and experiences with us. In addition, except to the extent you request otherwise, Schwab affiliates may continue to use information about you to perform services on our behalf, to respond to communications from you, as you authorize or request, or, if you are their customer, to offer you products or services. We may also continue to share information about you with any third parties, subject to applicable law.

### **Transfer of Personal Information Outside HKSAR**

Personal information about you may be transferred to a place outside Hong Kong SAR.

### **Company Mailing Choice**

Unless we receive your objection, Schwab may be required under the provisions of Rule 14b-1 of the U.S. Securities and Exchange Act of 1934 to release your name, address and number of shares to the issuers of securities you hold. If you object, you will not receive any corporate communications mailed out by the issuer other than regulatory mailings required to be sent out to ALL holders, which you will receive from us. If you wish to exercise this preference, please call **+852-2101-0500**.

### **Access to Your Personal Information**

You have the right:

- to ascertain whether we hold your personal information and request access to such information within a reasonable time;
- to require us to correct any personal information about you which may be inaccurate; and
- to ascertain our policies and practices in relation to personal information and to be informed of the kind of personal information held by us.

We have the right to charge a reasonable fee for the processing of any data access request.

The person to whom requests for access to personal information or correction of personal information held by Schwab Hong Kong, or for information regarding data policies and practices and the kinds of personal information held by Schwab Hong Kong are to be addressed is the Operations Manager, Charles Schwab, Hong Kong, Ltd. Rooms 602–606, Gloucester Tower, The Landmark, 15 Queen’s Road Central, Central, Hong Kong.

### **Safeguarding Your Information, Maintaining Your Trust**

We take precautions to ensure the information we collect about you is protected and is accessed only by authorised individuals or organisations.

Companies we use to provide support services are not allowed to use information about our clients for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of information to the performance of the specific services we have requested.

We restrict access to personal information by our employees and agents. Our employees are trained about privacy and are required to safeguard personal information.

We maintain physical, electronic and procedural safeguards to protect personal information.

### **Greater Accuracy Means Better Protection**

We are committed to keeping accurate, up-to-date records to help ensure the integrity of the information we maintain about you. If you identify an inaccuracy in this information, or if you need to make a change to it, please contact us promptly by calling **+852-2101-0500**.

### **A Commitment to Keeping You Informed**

We will provide you with advance notice of important changes to our information-sharing practices.

### **Contact Us With Questions**

If you have any questions or concerns, please contact us by email at [asia@schwab.com.hk](mailto:asia@schwab.com.hk) or call us at **+852-2101-0500**.

