

April 2025

Charles Schwab, Hong Kong, Ltd. Privacy Notice

At The Charles Schwab Corporation and its affiliates one of our most important assets is our relationship with you.

This Privacy Notice sets forth the privacy practices of The Charles Schwab Corporation and all affiliates (collectively, referred to as “we” or “Schwab” except as otherwise noted herein), including the types of information we collect about you, how we use and share that information both within and outside Schwab, and how you can instruct us to limit certain types of information sharing. This Privacy Notice applies to clients who have established a contractual relationship with Charles Schwab, Hong Kong, Ltd. (Schwab Hong Kong), one of our affiliates.

Clients of Schwab Hong Kong may exercise the rights outlined in this Privacy Notice by contacting the Operations Manager at asia@schwab.com.hk or calling us at +852-2101-0500.

By using Schwab Hong Kong's products and services, you expressly consent to the collection, use, processing, and sharing of your personal information in according to the provisions set forth in the Privacy Notice.

Supplying your personal information is required since we cannot do business with you unless we collect certain personal information. Failure to supply such personal information may result in us being unable to: approve the opening or continue the servicing of your account(s); provide related services or support to your account(s); or comply with applicable laws or regulations.

How We Collect Information About You

Schwab collects 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 products and 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.** We use cookies and other such technologies on our website(s) to measure website usage, for information security, to render a catered personal experience, and/or to market our products and services. By continuing to browse and use our website, you consent to these technologies. Most web browsers are initially set up to accept cookies and similar technologies. You can choose not to accept cookies and other types of online tracking by configuring your browser or installing browser extensions to reject them but doing so may cause some features of our website to malfunction. 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.

How We Share and Use Information About You with Schwab Affiliates

Your personal information may be shared amongst any of the Schwab affiliates, including but not limited to, financial companies such as Charles Schwab & Co., Inc.—a broker-dealer and clearing broker for Schwab Hong Kong; Charles Schwab Bank, SSB; Charles Schwab Futures and Forex LLC; Charles Schwab Investment Advisory, Inc.; and Charles Schwab Trust Company; and nonfinancial companies such as Performance 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 with one or more Schwab affiliates for the following purposes:

- to help provide you with better service, which may include:
 - researching, designing, and launching financial services or related products for clients;
 - improving our products and services and our use of technology, including the testing and upgrading of systems and processes; and
 - analyzing the results of our marketing activities to measures their effectiveness and relevance of our campaigns.

- to communications with you (or as you authorize or request) where it relates to:
 - the daily operation of your account and the services to be provided to you;
 - the administration of the products and services offered by Schwab Hong Kong;
 - the direct marketing of products and services offered by Schwab Hong Kong (see “Use and Provision of Personal Information for Use in Direct Marketing” below); and
 - the handling of any client service-related queries and complaints.
- to process your application to open a new account with Schwab Hong Kong, including the verification of your identity;
- to meet our ongoing regulatory and compliance obligations, which may include:
 - carrying out legal and regulatory compliance checks as part of the account opening process, including compliance with anti-money laundering regulations and fraud prevention;
 - preventing and detecting crime, including fraud, misuses of our products or services as well as the security of the Schwab IT systems, architecture and networks;
 - making disclosure as required by any applicable law, rules, regulations, codes of practice or guidelines or to assist in law enforcement purposes, investigations by police or other government or regulatory authorities in Hong Kong or elsewhere.
- to enable other Schwab affiliates to perform any of the above on behalf of Schwab Hong Kong; and
- any purposes directly relating to any of the above.

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

Schwab provides 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 trade confirmations and account statements. Our relationships with external service providers are governed by contracts that restrict processing of personal information for only permitted uses and require the service providers to maintain the confidentiality of this information; and
- when we believe that disclosure is required or permitted under law. For example, we may be required to disclose information to cooperate with regulatory or law enforcement authorities, to resolve consumer disputes, to perform credit/authentication checks, or for risk control.

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 for the following classes of services and products: financial, securities, 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, Schwab affiliates.

We may also provide your personal information to Schwab affiliates for use by them in direct marketing to you. We will not use your personal information or share your personal information with our affiliates for any of these purposes unless you have consented (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.

How to Limit the Sharing and Use of Information About You

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

If you choose to do so, Schwab Hong Kong 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;

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 Schwab. In addition, except to the extent you request otherwise, Schwab affiliates may continue to use information about you to provide products or 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.

Schwab may also continue to share information about you with any third parties, subject to applicable law.

Information Storage Period

We process and store personal information for as long as is required to provide our products and services to you, or as otherwise required by applicable laws.

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. Room 3401, 34th Floor, Gloucester Tower, The Landmark, 15 Queen's Road Central, Central, Hong Kong.

Security of Personal Information

We use technical, administrative, and physical controls to protect the confidentiality, integrity, and availability of your personal information. To learn more about information security at Schwab, please visit schwab.com/schwabsafe.

International Transfers

We transfer data outside of Hong Kong SAR when necessary and as required by the legal obligations of any of our affiliates under relevant applicable laws. We may transfer personal information to our clearing broker Charles Schwab & Co., Inc. and other affiliates based in the U.S.

Some business functions and services are provided by external suppliers either within or outside Hong Kong SAR. For example, we use third-party service providers for computing and communication services. Our relationships with external service providers are governed by contracts that restrict processing and maintain confidentiality.

Updates

We may update or change this Privacy Notice from time to time without advance notice. Should any new Privacy Notice go into effect, we will post it on our website. When we make changes, we will update the "Effective Date" at the bottom of this page. Any changes to this Privacy Notice will become effective when posted.

Effective Date: April 2025



Charles Schwab, Hong Kong, Ltd. is registered with the Securities and Futures Commission (“SFC”) to carry out the regulated activities in dealing in securities and advising on securities under registration CE number ADV256.