

Personal Information Collection Statement 個人資料收集聲明

ZA International Insurance Broker Limited (“ZA Broker”/ “We”) is committed to the protection of privacy in relation to personal information. ZA Broker collects, uses and retains your personal information in accordance with the Data Protection Principles and all relevant provisions of the Personal Data (Privacy) Ordinance (the “Ordinance”).

眾安國際保險經紀有限公司（「眾安國際經紀」/「我們」）致力保護閣下的私隱。眾安國際經紀根據載於香港《個人資料(私隱)條例》（「條例」）的保障資料原則及各項有關規定收集、使用及保留閣下的個人資料。

1) Personal information we collect and/or hold 我們收集及/或持有的個人資料

Your personal information that we collect and/or hold, we believe to be relevant for us to understand your financial needs as well as to provide our service to you.

我們收集及/或持有我們認為相關而有助於瞭解閣下理財需要及為閣下提供服務的個人資料。

Broadly, we collect personal data (such as your name, identity card number, date of birth, correspondence address, phone number, email address, identification document image, facial image, employment information, address and income proof images etc.), supplied by you to us from time to time in connection with matters and purposes set out in paragraph 3.

就廣義而言，我們會不時收集閣下提供予我們與第3段所述事項及目的相關的個人資料（例如閣下的姓名、身份證號碼、出生日期、通訊地址、電話號碼、電郵地址、身份證明文件影像、面部圖像、僱用資料、地址及收入證明影像、信用相關資料等）。

We may also collect your data, directly or indirectly, in the ordinary course of our business, including (without limitation) information received from third parties, the public domain, collected through your use of the mobile applications, websites, cookies, behavioural or location tracking tools, banking services, financial services or other services of ZhongAn Technologies International Group Limited and its subsidiaries and affiliates (“ZhongAn Group”).

我們亦可能在日常業務過程中直接或間接收集閣下的資料，包括（但不限於）從第三方、公共領域、透過閣下使用移動應用程式、網站、cookies、行為或位置追蹤工具、銀行服務、金融服務或眾安科技（國際）集團有限公司及其附屬公司及聯屬公司的各別公司或統稱「眾安集團」的其他服務。

2) Importance of personal information collection 收集個人資料的重要性

The provision of your personal information is on a voluntary basis; however, if you do not provide sufficient information, we may not be able to provide service to you.

閣下提供個人資料皆是自願的。但倘若閣下未能提供足夠資料，我們可能無法為閣下提供服務。

3) Usage of personal information 個人資料的用途

Your personal information held by ZA Broker may be used for the following purposes:-

眾安國際經紀所持有的閣下個人資料可能會被用於下列用途：

- (a) establishing and serving you as a client of ZA Broker, the third-party Financial Services and/or Financial Products suppliers of ZA Broker and their respective affiliates and/or business partners; 確立閣下為眾安國際經紀、眾安國際經紀的第三者理財服務及/或理財產品供應商及彼等聯營及/或業務夥伴的客戶並向閣下提供服務；
- (b) constructing and maintenance of contact lists; 建立及維持聯絡人名單；
- (c) determining whether any Financial Services and/or Financial Products of ZA Broker, the third party, suppliers of ZA Broker and their respective affiliates and/or business partners (“Financial Services and/or Financial Products”) are suitable for you and to offer any such Financial Services and/or Financial Products to you, 決定任何眾安國際經紀、第三者，眾安國際經紀的供應商及彼等聯營及/或業務夥伴的理財服務及/或理財產品（“理財服務及/或理財產品”）是否適合閣下，並以任何該等理財服務及/或理財產品向閣下提出要約；
- (d) identity verification and records purposes; 核對身份及儲存紀錄之用；
- (e) complying with any law or regulation binding on or applicable to ZA Broker; 遵守適用於眾安國際經紀的法律或規例；
- (f) operating and maintaining Financial Services and/or Financial Products, including to understand the overall picture of your relationship with the ZhongAn Group by linking data in respect of all accounts you are connected to; 營運及維持理財服務及/或理財產品，包括透過連接與閣下所有賬戶相關的資料以了解閣下與眾安集團關係的整體情況；
- (g) meeting our internal operational requirements or that of the ZhongAn Group (including credit and risk management, system or product development and planning, insurance, audit and administrative purposes); 符合我們或眾安集團的內部營運要求（包括信貸及風險管理、系統或產品開發及規劃、保險、審核及行政目的）
- (h) in connection with matching against any data held by us or the ZhongAn Group for any purpose set out in this paragraph (whether or not with a view to taking any adverse action against you); 就我們或眾安集團為這段所載任何目的（不論是否對閣下採取任何不利行動）所持有的任何資料進行配對；
- (i) designing financial products and services (including banking, cards, financial, insurance, securities and investment services or related products, if applicable) for your use; 設計金融產品及服務（包括銀行、銀行卡、金融、保險、證券及投資服務或相關產品（如適用））供閣下使用；
- (j) marketing services, products and other subjects including but not limited to promoting, marketing or selling of Financial Services and/or Financial Products by electronic or other means (see paragraph 7 below); 推廣服務、產品及其他主題包括但不限於透過電子或其他模式作推廣、宣傳或銷售理財服務及/或理財產品。（見下文第7段）；

- (k) enforcing your obligations, to us or any other member of the ZhongAn Group, including collecting amounts outstanding from you; 履行閣下對我們或眾安集團任何其他成員公司的義務，包括收取閣下的未付款項；
- (l) meeting or complying with any obligations, requirements or arrangements for disclosing and using data that apply to us or any other member of the ZhongAn Group or that it is expected to comply according to: 符合或遵守任何義務、要求或安排，以披露及使用適用於我們或眾安集團任何其他成員公司的資料，或預計會用以遵守以下規定：
 - (i) any present or future law or regulation within or outside Hong Kong (e.g. the Inland Revenue Ordinance (Cap. 112) and its provisions including those concerning automatic exchange of financial account information); 香港境內或境外的任何現行或日後的法律或法規（例如稅務條例（第112章）及其條文，包括有關自動交換財務賬戶資料者）；
 - (ii) any present or future guidelines or guidance issued by any legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations of financial services providers within or outside Hong Kong (e.g. guidelines or guidance given or issued by the Inland Revenue Department including those concerning automatic exchange of financial account information); 由香港境內或境外的任何法律、監管、政府、稅務、執法或其他機構，或自我監管或行業團體或金融服務提供者協會發出的任何現有或日後指引或指導（例如由稅務局頒布或發出的指引或指導，包括有關自動交換財務賬戶資料者）；
 - (iii) any present or future contractual or other commitment with local or foreign legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations of financial services providers applicable to us or any member of the ZhongAn Group by reason of its financial, commercial, business or other interests or activities in or related to the relevant jurisdiction (“Authorities”, and each an “Authority”); and 就於相關司法管轄區內或與之相關的金融、商業、業務或其他利益或活動而言，與本地或外國法律、監管、政府、稅務、執法或其他機構，或自我監管或行業機構或適用於我們或眾安集團任何成員公司的金融服務供應商協會（「監管當局」，以及各自稱為「當局」）的任何現有或日後合約性或其他承諾；
 - (iv) any demand or request from an Authority; 當局的任何要求或規定；
- (m) meeting any obligations, policies, measures or arrangements for sharing data and information within the ZhongAn Group and/or any other use of data and information pursuant to any group-wide programmes for compliance with sanctions or prevention or detection of money laundering, terrorist financing, fraudulent activities or other unlawful activities; 履行在眾安集團內有關共享資料及信息的任何義務、政策、措施或安排及/或根據任何集團範圍內的計劃使用任何其他資料及信息，以遵守制裁或預防或偵查洗錢、恐怖主義融資、欺詐活動或其他非法活動；
- (n) enabling an actual or potential assignee of all or any part of our business and/or asset or participant or sub-participant of our rights in respect of you, to evaluate the transaction intended to be the subject of the assignment, participation or sub-participation; 讓我們的全部或任何部分業務及/或資產的實際或潛在受讓人或我們對閣下的權利的參與者或次級參與者能夠評估旨在作為轉讓、參與或次級參與主體的交易；
- (o) in connection with any member of the ZhongAn Group defending or responding to any legal, governmental, or regulatory or quasi-governmental related matter, action or proceeding (including any prospective action or legal proceedings), including where it is in our legitimate interests or any member of the ZhongAn Group to seek professional advice, for obtaining legal advice or for establishing, exercising or defending legal rights; 與眾安集團任何成員公司有關的任何法律、政府或監管或準政府相關事宜、訴訟或程序（包括任何日後的訴訟或法律訴訟）的辯護或回應，包括其在符合我們的合法利益或任何眾安集團成員公司尋求專業意見、獲取法律意見或建立、行使或維護法律權利；
- (p) organising and delivering seminars for you; 為閣下籌組及開辦研討會；
- (q) managing, monitoring and assessing the performance of any agent, contractor or third party service provider who provides administrative, telecommunications, computer, payment or securities clearing or other services to us in connection with the establishment, operation or maintenance of Financial Services and/or Financial Products, if applicable; and 管理、監控及評估任何為我們提供與理財服務及/或理財產品的設立、營運或維持相關的行政、通信、電腦、付款或證券結算或其他服務（如適用）的代理人、承包商或第三方服務供應商的表現；及
- (r) any other purposes relating to the purposes listed above. 與上述目的有關的任何其他目的。

4) Information confidentiality 資料保密

Your personal information held by ZA Broker will be kept confidential. But for the purpose of providing service to you as set out in paragraph 3, we may provide, transfer or disclose your personal information to any one or more of the following parties (whether within or outside Hong Kong):

眾安國際經紀所持有的閣下個人資料會被保密。但在為閣下提供服務的目下依照第3段，眾安國際經紀可能會把閣下個人資料給予轉讓或披露給以下任何一方或多方（無論在香港境內還是境外）：

- (a) any third-party Financial Services and/or Financial Products suppliers of ZA Broker and their respective affiliates and/or business partners; 任何眾安國際經紀的第三者理財服務及/或理財產品供應商及彼等聯營及/或業務夥伴；
- (b) any agent, contractor or third party services and/or products providers of ZA Broker and their respective affiliate and/or business partner who provides administrative, telecommunications, computer, payment, anti-money laundering and/or other regulatory screenings and/or other services to ZA Broker for any of the purposes set out above; 任何向眾安國際經紀提供行政、電訊、電腦、繳費、反清洗黑錢及/或其他法規的審查及/或其他服務的代理、承包商或第三者服務及/或產品供應商及彼等聯營及/或業務夥伴，以作上述任何用途；
- (c) branch, subsidiary, holding company, associated company and/or affiliates of ZA Broker. 眾安國際經紀的分行、附屬公司、控股公司、有聯繫公司及/或關聯方

- (d) any person to whom ZA Broker is under an obligation to make disclosure under the requirement of any law or regulation binding on or applicable to ZA Broker or any of its group companies; 根據法律或規例約束力的規定下，眾安國際經紀或其集團公司有責任向其作出披露的任何人士；
- (e) any other person under a duty of confidentiality to ZA Broker which has undertaken to keep such information confidential including any other member of ZhongAn Group; and 其他對眾安國際經紀資料有保密責任的人士包括眾安集團任何其他成員公司；及
- (f) any person or entity to whom we or any other member of the ZhongAn Group is under an obligation or otherwise required to make disclosure in connection with or for the purposes set out in paragraphs 3(l) and 3(m) above; 我們或眾安集團任何其他成員公司有義務須就上文第3(l)及3(m)段所述目的以其他方式作出披露的任何人士或實體；
- (g) any financial institution and merchant acquiring company with which you have or propose to have dealings; 與閣下或擬與閣下進行交易的任何金融機構及收購公司的商戶；
- (h) any actual or proposed assignee of all or any part of our business and/or asset or participant or subparticipant or transferee of our rights in respect of you; 我們的全部或任何部分業務及/或資產的任何實際或潛在受讓人，或我們對閣下的權利的參與者或次級參與者或受讓人；
- (i) any party giving or proposing to give a guarantee or third-party security to guarantee or secure your obligations; 任何一方就擔保或確保閣下的義務而給予或建議提供擔保或第三方擔保；
- (j) any interface (such as an application programming interface) that links to, or in any way makes available information about our Financial Services and/or Financial Products; 連接或以任何方式提供有關我們的理財服務及/或理財產品的資料的任何界面（例如應用程序編程界面）；
- (k) any member of the ZhongAn Group acting as a data controller in respect of your data; 眾安集團的任何成員公司就閣下的資料擔任資料監管人；
- (l) third party financial institutions, insurers, credit card companies, securities and investment services providers; 第三方金融機構、保險公司、信用卡公司、證券及投資服務供應商；
- (m) third party reward, loyalty, co-branding and privileges programme providers; 第三方獎勵、忠誠、聯乘品牌及優惠計劃供應商；
- (n) our co-branding partners and/or co-branding partners of any member of the ZhongAn Group (the names of such co-branding partners can be found in the application form(s) for the relevant services and products, as the case may be); 我們的聯乘品牌合作夥伴及/或眾安集團任何成員公司的聯乘品牌合作夥伴（此等聯乘品牌合作夥伴的名稱可在相關服務及產品的申請表中找到（視情況而定））；
- (o) charitable or non-profit making organisations; and/or 慈善或非牟利機構；及/或
- (p) external service providers (including but not limited to mailing houses, telecommunication companies, telemarketing and direct sales agents, call centres, data processing companies and information technology companies) that we engage for the purposes set out in paragraph 3(j) above. 我們就上文第3(j)段所述目的而聘用的外聘服務供應商（包括但不限於郵寄公司、電信公司、電話銷售及直銷代理、電話熱線中心、數據處理公司及信息技術公司）。

5) Transfer of information outside Hong Kong 轉移資料往香港以外地區

ZA Broker may from time to time transfer your personal information outside Hong Kong for different purposes including processing or storage.

眾安國際經紀可能不時為不同的目的（包括處理或儲存）將閣下的資料轉移往香港以外地區。

6) Data Access 資料查閱

6.1 Under and in accordance with the terms of the Ordinance, you have the right to (i) check whether ZA Broker holds data about you and seek access to such data; and (ii) require ZA Broker to correct any data relating to you which is inaccurate.

根據條例中的條款，閣下有權(i)查詢眾安國際經紀是否持有閣下的資料及查閱有關的資料；及(ii)要求眾安國際經紀改正有關閣下不準確的資料。

6.2 ZA Broker may charge a reasonable fee for the processing of any data access request.

眾安國際經紀有權就處理任何查閱資料的要求收取合理費用。

6.3 Requests under section 6.1 should be addressed to the following:

ZA Broker Data Protection Officer

28/F Infinitus Plaza,

199 Des Voeux Road Central, Hong Kong

任何關於上述條款 6.1 的要求，應向下列人士提出：

眾安國際經紀資料保護主任

香港上環德輔道中199號無限極廣場28樓

7) Direct Marketing 直接促銷

We intend to use your data for direct marketing but we may not do so unless we have received your consent (or indication of no objection). Please note that:

我們擬在直銷中使用閣下的資料，但我們在未取得閣下同意（或表示不反對）前不會使用閣下的資料。請注意以下各項：

- (a) we may use your name, contact details, products and services portfolio information, transaction pattern and behaviour, financial background and demographic data in direct marketing; 我們或會在直銷中使用閣下的姓名、聯絡方式、產品及服務組合資料、交易模式及行為、財務背景及人口統計數據；
- (b) we may market the following classes of services, products and subjects: 我們或會推銷以下類別的服務、產品及主題：
 - (i) Financial Services and/or Financial Products, financial, insurance, fiduciary, investment services, credit card, securities, investment, banking and related services and products; 理財服務及/或理財產品、金融、保險、信託、投資服務、信用卡、證券、投資、銀行及相關服務及產品；
 - (ii) reward, loyalty or privileges programmes and related services and products; 獎勵、忠誠或優惠計劃及相關服務及產品；
 - (iii) services and products offered by our co-branding partners (the names of such co-branding partners can be found in the application form(s) and/or advertising material(s) for the relevant services and products, as the case may be); and 我們的聯乘品牌合作夥伴提供的服務和及產品（此等聯乘品牌合作夥伴的名稱可在相關服務及產品的申請表及/或廣告宣傳中找到（視情況而定））；及
 - (iv) donations and contributions for charitable and/or non-profit making purposes; 為慈善及/或非牟利目的而作出捐贈及捐助；
- (c) we and/or any of the following persons may provide or solicit the above services, products and subjects: 我們及/或以下任何人士或會提供或索取上述服務、產品及主題：
 - (i) any member of the ZhongAn Group; 眾安集團任何成員公司；
 - (ii) third party financial institutions, insurers, credit card companies, securities and investment services providers; 第三方金融機構、保險公司、信用卡公司、證券及投資服務提供商；
 - (iii) third party reward, loyalty, co-branding or privileges programme providers; 第三方獎勵、忠誠、聯乘品牌或優惠計劃供應商；
 - (iv) our co-branding partners and/or co-branding partners of any member of the ZhongAn Group; and 我們的聯乘品牌合作夥伴及/或眾安集團任何成員公司的聯乘品牌合作夥伴；及
 - (v) charitable or non-profit making organisations. 慈善或非牟利機構。

You may opt-in of receiving direct marketing materials from us or request us to cease using your personal data or contact information for direct marketing purposes by notifying us.

閣下可以選擇同意接收我們的直銷宣傳資料或通知我們要求我們就直銷目的停止使用閣下的個人資料或聯繫信息。

If you consent to ZA Broker using your personal information for the above purposes, please tick the relevant "opt-in" box on this Client Agreement, and we will do so. You may also subsequently withdraw your consent by writing to our ZA Broker Data Protection Officer. If you exercise your right to opt-in of the use of your personal information for the above purposes, it will mean that ZA Broker will be able to send you any market commentary, direct marketing, targeted or special offers in the future.

如閣下同意眾安國際經紀就以上用途使用閣下的個人資料，請在本客戶協議內有關的選擇同意方格中畫上✓號，我們將會使用閣下的個人資料作以上用途。閣下亦可隨時通知我們的眾安國際經紀資料保護主任撤回閣下的同意意願。若閣下行使你的權利同意閣下的個人資料被用作以上用途，這代表將來閣下能從眾安國際經紀處收到任何市場評論與及針對性或特別優惠的直接促銷。

8) Provision of data for use in direct marketing 提供用於直銷的資料

In addition to marketing the services, products and subjects set out in paragraph 7(b) above ourselves:
除銷售上文第7(b)段所述服務、產品及主題外：

- (a) we also intend to provide the data described in paragraph 7(a) above to all or any of the persons described in paragraph 7(c) above for use by them in marketing those services, products and subjects, and we require your written consent (which includes an indication of no objection) for that purpose; and 我們亦擬將上文第7(a)段所述的資料提供予上文第7(c)段所述的所有或任何人士，供彼等在銷售該等服務、產品及主題時使用，而我們要求閣下就此目的發出書面同意（包括不反對的指示）；及
- (b) we may receive money or other property in return for providing the data to the other persons in paragraph 8(a) above and, when requesting your consent or no objection pursuant to paragraph 8(a) above, we will inform you if we will receive any money or other property in return for providing the data to the other persons. 我們或會就提供資料予上文第8(a)段所述人士而換取到金錢或其他財產，並在根據上文第 8(a)段要求閣下作出同意或不反對時，我們會通知閣下我們是否將收到的任何金錢或其他財產，以換取向其他人士提供資料。

If you wish us to provide your data to other persons for use in direct marketing, you may exercise your opt-in right by notifying us.

如閣下希望我們就直銷而將閣下的資料提供予其他人士，閣下可通知我們行使閣下的同意選擇權利。

9) Personal data of another person 其他人士的個人資料

Where you have provided us with another person's personal data, you should provide him/her with a copy of this Agreement and inform them of how we may use their data.

如閣下已向我們提供其他人士的個人資料，閣下須向其提供本通知的副本，並知會彼等有關我們將如何使用其資料。

This Personal Information Collection Statement shall be deemed an integral part of all contracts, agreements and other binding arrangements which you have entered into or intend to enter into with ZA Broker.

此個人資料收集聲明將成為閣下與眾安國際經紀或將與眾安國際經紀訂定之所有合約、協議、及其他約束性安排之一部份。