

## PRIVACY POLICY

MCTRUST LIMITED (“**MCTRUST**”) is devoted to ensure that all personal data submitted to our website are handled in strict adherence to the relevant provisions of the Personal Data (Privacy) Ordinance (Chapter 486) of the Laws of the Hong Kong.

### THE PERSONAL DATA WE COLLECT

To effectively provide our services, we collect the following types of personal data, including but limited to:

- *Identifying details:* This may include name, date of birth, age, gender, nationality, telephone number email address, mailing address, etc.
- *Bank account details:* Bank account details such as credit or debit card number, billing address and expiry date may be collected when you make payment through our website to purchase our products or services.
- *Technical information:* The device information such as Internet protocol address, operating system and platform, browser type and version, connection speed, carrier name, time zone setting and location may be collected when you access our website.

### WHY WE COLLECT YOUR PERSONAL DATA

By sharing your personal data to us, you assist us in enhancing our ability to deliver quality services tailored to your individual needs and preferences. To offer certain customized products and services, we may need certain personal details from you. If some information is not provided, we may not be able to fully meet your specific needs.

By submitting your personal data to us, you agree that it may be used for the following purposes, including but not limited to:

- creating customer profiles and maintaining customer records to facilitate requests and respond to inquiries or feedback;
- processing applications for and managing services provided by the MCTRUST to you or third parties;
- client relationship management initiatives like rewards programs and account privileges;
- maintaining financial and transaction records for present and future business needs;
- marketing and related services, products or goods, if you have consented to direct marketing;
- determining amounts owed to you or owed to MCTRUST;

- collecting overdue amounts from you to MCTRUST;
- providing personalized advertising to you on third party websites;
- tailoring personalized content and recommendations based on your interests, preferences and profile;
- monitoring, evaluating and analysing trends, usage and activities to improve our services and products;
- any other purposes disclosed on our website;
- participating in any legal or administrative proceedings;
- meeting any legal or regulatory disclosure requests or requirements; and
- any other lawful and related purpose to any of the above.

We can also generate additional data about you through internal analysis and combining information across our organization based on your interactions with us. For example, through analysis of the cookies and similar technologies placed on your devices when you access our website or applications. This allows us to better understand usage patterns and customize your experience.

## **WHO WE SHARE YOUR PERSONAL DATA WITH**

We may disclose personal data about you to the following third parties or as otherwise permitted by law, including but not limited to:

- third party service providers that support MCTRUST's business operations and provision of financial services, including but not limited to technology, payment, auditing, consulting and outsourcing service providers;
- affiliates and branches of MCTRUST for business and operational purposes;
- potential or actual guarantors related to your accounts or transactions;
- third parties subject to contractual confidentiality obligations with MCTRUST;
- other financial institutions as necessary in connection with your accounts or proposed transactions;
- third parties with your expressed consent to share your personal data;
- credit reference agencies and, where relevant due to default, and debt collection agencies;
- potential assignees or transferees of MCTRUST or its assets;
- regulatory and law enforcement authorities as required by law;
- other third parties as required by applicable laws or regulations; and
- MCTRUST may transfer your personal data internationally, including to places outside Hong Kong, as necessary to provide services to you and as permitted by law.

## **DIRECT MARKETING**

We may use certain personal data such as name, email, mailing address, phone number for marketing and promotional purposes. This includes newsletters, event/offer notifications via email, post or texts.

Our goal is to share interesting and relevant content based on customer profiles. We limit marketing to reasonable, proportionate outreach.

All direct marketing includes an unsubscribe option or opt-out further communication on any direct marketing communication delivered to you.

## **ACCESS AND RECTIFICATION OF PERSONAL DATA**

As a customer of MCTRUST, certain rights apply with respect to your personal information under our care. These include:

- *Right of access:* You can request details on the data retained, its usage and storage period.
- *Right of rectification:* If any information is inaccurate or incomplete, we will make the appropriate corrections upon your written request.
- *Right of erasure:* Under certain situations prescribed by law, you may request removal of your personal profile from our systems.
- *Right to restrict or object to processing:* You have the ability to limit or prevent use of your data for certain purposes such as direct marketing.
- *Right to withdraw consent:* Provided consent for a specific reason can be revoked, with the understanding this may impact ongoing services and account management.

Should you wish to exercise these rights, submit your written request to our **Privacy Data Officer** at **[Unit 902, 9/F, Central Plaza, 18 Harbour Road, Wan Chai, Hong Kong]**. Please provide sufficient identifying details to properly access your records. MCTRUST reserves the right to charge a reasonable administrative fee for certain data provision requests mentioned above.

This document is written in English language and may be translated into other languages. In case of any discrepancy or inconsistency between the English and the translated version of this document, the English version shall prevail.