

## Privacy Policy

### Overview

Overseas Company Services Limited values the Client's privacy and cares about the way in which the Client's personal information is treated. This Privacy Policy describes how Overseas Company Services Limited and its Group Companies and other member Company, firms, connected parties and/or affiliates of Overseas Company Services Limited and their respective agents (hereinafter 'OCS'), collects, uses, shares, and otherwise processes the Client's Personal Data (defined below).

In this Privacy Policy, "**Personal Data**" means information that (either in isolation or in combination with other information held by OCS) enables the Client to be identified as an individual or recognized directly or indirectly.

### **1. What Personal Data OCS collects**

OCS collects various categories of Personal Data from the Client, including but not limited to:

- 1.1. The Client's name and contact information such as the Client's home or business address, email address, telephone number(s) and other contact details;
- 1.2. Biographical information such as the Client's identity, including the Client's date of birth, tax identification number and the Client's passport number or national identity card details, country of domicile and/or the Client's nationality;
- 1.3. Information relating to the Client's financial situation such as income, expenditure, assets and liabilities, sources of wealth, as well as the Client's bank account details and transaction, payment history;
- 1.4. Information about the Client's knowledge and experience;
- 1.5. An understanding of the Client's goals and objectives in procuring OCS services;
- 1.6. Information about the Client's background including employment, education, family or personal circumstances, and interests, where relevant;
- 1.7. Information to assess whether the Client may represent a politically exposed person or money laundering risk; and
- 1.8. Any other data relating to the Client which may be provided to OCS, in the course of providing services to the Client.

OCS obtains the Client's Personal Data and other information about the Client as part of OCS's business acceptance processes and as necessary in the course of providing related services.

### **2. How OCS collects Personal Data**

OCS collects the Client's Personal Data in a number of ways, including but not limited to:

- 2.1. From the information the Client, or through his/her contact person, company or intermediary, provides to OCS when the Client meets in person with representatives of OCS or communicates with OCS by telephone, fax, email or other forms of electronic communication. In this respect, OCS may monitor, record and store any such information and communication;
- 2.2. When the Client, or through its contact person, company or intermediary, completes (or OCS completes on behalf of the Client) client on-boarding or application or other forms;
- 2.3. From other companies in the OCS Group;
- 2.4. From the Client's contact persons, agents, advisers, intermediaries, and custodians of the Client's assets; and

- 2.5. From publicly available sources or from third parties, most commonly where OCS needs to conduct background checks about the Client.

Where OCS receives data from its Clients about employees, customers or other individuals, the Client is responsible for ensuring that any such data is transferred in compliance with applicable data protection laws.

### **3. Purpose and Usage of Personal Data**

The purposes for which OCS uses Personal Data, and the legal bases for such processing, are as follows:

- 3.1. **Performance of a contract with the Client.** OCS processes the Client's Personal Data because it is necessary for the performance of a contract to which the Client are a party or in order to take steps at the Client's request prior to entering into a contract. In this respect, OCS uses the Client's Personal Data for the following:
  - 3.1.1. To prepare a proposal for the Client regarding the services OCS offers;
  - 3.1.2. To provide the Client with the services as set out in OCS's Service Agreement with the Client or as otherwise agreed with the Client from time to time;
  - 3.1.3. To deal with any complaints or feedback the Client may have;
  - 3.1.4. For any other purpose for which the Client provides OCS with their Personal Data.
- 3.2. **Legitimate interests.** OCS also processes the Client's Personal Data because it is necessary for OCS's legitimate interests, or sometimes where it is necessary for the legitimate interests of another person. In this respect, OCS uses the Client's Personal Data for the following:
  - 3.2.1. For marketing to the Client. In this respect, see the separate section on Marketing below;
  - 3.2.2. Training OCS's staff or monitoring their performance;
  - 3.2.3. For the administration and management of OCS's business, including recovering money the Client owes to OCS, and archiving or statistical analysis;
  - 3.2.4. Seeking advice on OCS's rights and obligations, such as where OCS requires OCS's own legal advice;
- 3.3. **Legal obligations.** OCS also processes the Client's Personal Data for OCS's compliance with a legal obligation which OCS is under. In this respect, OCS will use the Client's Personal Data for the following:
  - 3.3.1. To meet OCS's compliance and regulatory obligations, such as compliance with anti-money laundering laws;
  - 3.3.2. As required by tax authorities or any competent court or legal or government authority of any jurisdiction.
- 3.4. **Keeping the Client's Personal Data.** The Client's Personal Data will be retained for as long as it is necessary to fulfill the purposes outlined in this Privacy Policy and as otherwise specified in applicable record retention policies and procedures.

#### 4. Sharing the Client's Personal Data

OCS is an international corporate consultant and company formation organization and any information provided by the Client may be shared with and processed by any entity in its Group or worldwide network, and/or a connected party or an affiliate of OCS.

- 4.1. **OCS's professional advisers and auditors.** OCS may share Personal Data with OCS's professional advisers and auditors where it is necessary for OCS to obtain their advice or assistance.
- 4.2. **Suppliers and service providers.** OCS may share Personal Data with suppliers and service providers to enable such parties to perform functions on behalf of OCS and under OCS's instructions in order to carry out the purposes identified above.
- 4.3. **Financial institutions.** OCS may share Personal Data with financial institutions.
- 4.4. **Mandatory disclosures and legal claims.** OCS may share Personal Data in order to comply with any subpoena, court order or other legal process, to comply with a request from any government regulators, government agencies, governmental request or any other legally enforceable demand. OCS may also share Personal Data to establish or protect OCS's legal rights, property, or safety, or the rights, property, or safety of others, or to defend against legal claims.

OCS does not sell, rent or otherwise make personal information commercially available to any third party, except with the Client's prior permission. If the Client has questions about the parties with which OCS shares Personal Data, please contact OCS as specified below.

#### 5. Cross-Border Data Transfers

OCS may transfer Personal Data to jurisdictions as necessary for the purposes described above, including to locations outside the jurisdiction in which the Client provides it, as the transfer of Personal Data is necessary to provide the requested information and/or to perform any requested transaction by the Client.

#### 6. Client's Rights regarding their Personal Data

The European Union's General Data Protection Regulation and other applicable data protection laws provide certain rights for data subjects. The rights includes:

- 6.1. **Access.** The Client has the right to request a copy of their Personal Data OCS holds, which OCS will provide in electronic form. At OCS's discretion OCS may require the Client to prove their identity before providing the requested information. If the Client requires multiple copies of their Personal Data, OCS may charge a reasonable administration fee.
- 6.2. **Rectification.** The Client has the right to require that any of their incomplete or inaccurate Personal Data that OCS holds to be amended.
- 6.3. **Deletion.** The Client has the right to request OCS to delete any of their Personal Data that OCS holds, unless OCS is required to retain such data in order to fulfill the purposes set out above in section 3 and comply with a legal obligation or to establish, exercise or defend legal claims.
- 6.4. **Restriction.** The Client has the right to request to restrict OCS's processing of the Client's Personal Data where:
  - 6.4.1. The Client believes such data to be inaccurate;
  - 6.4.2. OCS's processing is unlawful; or
  - 6.4.3. OCS no longer need to process such data for a particular purpose, which OCS is

unable to delete due to a legal or other obligation or because the Client does not want it to be deleted.

6.5. **Objection.** Where the legal justification for OCS's processing of the Client's Personal Data is OCS's legitimate interest, the Client has the right to object to such processing on grounds relating to the Client's particular situation. OCS will abide by the Client's request unless OCS has compelling legitimate grounds for the processing which override the Client's interests and rights (such as to comply with any rules and regulations in which OCS operates), or if OCS needs to continue to process the data for the establishment, exercise or defence of a legal claim.

6.6. **Withdrawal of consent.** If the Client has consented to OCS's processing of the Client's Personal Data, the Client has the right to withdraw the Client's consent at any time. This includes cases where the Client wishes to opt out from marketing messages that the Client receives from OCS.

## 7. **Data Security**

It is important to note that no security system or system of transmitting information over the Internet is guaranteed to be secure. There is an inherent risk in the submission of information online, use of e-mail and facsimile. OCS uses a variety of technical and organisational measures to help protect the Client's personal information from accidental, unlawful or unauthorised access, use, disclosure, alteration, loss or destruction consistent with applicable data protection laws.

Despite such efforts, however, please note that no company can fully eliminate risks or guarantee the security of personal information. Unauthorized entry or use, hardware or software failure, and other factors may compromise the security of information about the Client at any time, and OCS bears no liability for uses or disclosures of personal information or other data arising in connection with theft of the information or other malicious actions in relation to the Client's Personal Data.

## 8. **Marketing**

OCS will send marketing materials about similar services OCS provides to the Client, as well as other information in the form of alerts, newsletters and invitations to events or functions which OCS believes might be of interest to the Client. OCS will communicate this to the Client in a number of ways including by post, telephone, email, SMS or other digital channels.

Please contact OCS if the Client wish to opt-out of any marketing information.

## 9. **Contact us**

If the Client needs further information or have any questions or complaints about OCS's privacy policy or practices, please contact:

Data Privacy Team

Email: [info@ocsnt.com](mailto:info@ocsnt.com)

Telephone: +852 8206 0232

Post: 10/F., Tower A, Billion Centre, 1 Wang Kwong Road,  
Kowloon Bay, Kowloon, Hong Kong, China