



PRIVACY POLICY STATEMENT

The purpose of this Privacy Policy Statement is to establish the policies and practices of BBMSL Limited. The Company highly values personal privacy and strives to preserve the confidentiality and security of all the personal information which the Company may collect so as to strengthen the trust and confidence between the Company and the Data Subjects, Employees, Users and Other Individuals (as hereinafter defined).

The term "Data Subject(s)", wherever mentioned in this Statement, includes directors, shareholders, officers and managers of any corporate applicants and Data Subjects/Users for related services by the Company;

The term "Employee(s)", wherever mentioned in this Statement, includes employees and/or applicants for any openings offered by the Company.

The term "User(s)", wherever mentioned in this Statement, includes visitors and/or users of the Company's Website, or when the visitors and/or users communicate with the Company via any electronic devices including but not limited to computer and mobile phone ("Electronic Devices").

The term "Other Individuals", wherever mentioned in this Statement, include suppliers, contractors, service providers, business partners, participants of seminars, visitors, other contractual counterparties of the Company and the employee(s) of the above-mentioned parties (if applicable).

Kinds of Personal Data Held

There are three broad categories of personal data held in the Company. They comprise personal data contained in the following:

1. **Data Subject records**, which are necessary for Data Subjects to supply to the Company from time to time, which include but not limited to connecting with the opening or continuation of accounts and credit card acquiring related services.
2. **Employee records**, which include but not limited to the name, address, e-mail address, contact phone number, educational background, curriculum vitae and relevant personal data of family members of Employees.
3. **Other Individuals records**, which include but not limited to the name, address, e-mail address, contact phone number of suppliers, contractors, service providers, business partners, participants of seminars, visitors, other contractual counterparties of the Company and the employee(s) of the above-mentioned parties (if applicable); and other operational and administrative records that contain personal data.

Purposes of Keeping Personal Data

1. In relation to Data Subjects:



The purposes for which the data relating to the Data Subjects may be used are as follows:

- i. assessing the merits and suitability of the Data Subjects as actual or potential applicants for credit card acquiring related services processing and/or approving their applications, variation, renewals, cancellations, reinstatements and claims;
- ii. complying with the obligations, requirements or arrangements for disclosing and using data that apply to the Company or that it is expected to comply according to:
 - a) any law binding or applying to it within or outside the Hong Kong Special Administrative Region existing currently and in the future (e.g. the Inland Revenue Ordinance and its provisions including those concerning automatic exchange of financial account information);
 - b) any guidelines or guidance given or 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 the Hong Kong Special Administrative Region existing currently and in the future (e.g. guidelines or guidance given or issued by the Inland Revenue Department including those concerning automatic exchange of financial account information);
 - c) 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 that is assumed by or imposed on the Company or any of its branches by reason of its financial, commercial, business or other interests or activities in or related to the jurisdiction of the relevant local or foreign legal, regulatory, governmental, tax, law enforcement or other authority, or self-regulatory or industry bodies or associations;
- iii. complying with any obligations, requirements, policies, procedures, measures or arrangements for sharing data and information within the Company and/or any other use of data and information for compliance with sanctions or prevention or detection of money laundering, terrorist financing or other unlawful activities;
- iv. enabling an actual or proposed assignee of the Company, or participant or sub-participant of the Company's rights in respect of the Data Subjects to evaluate the transaction intended to be the subject of the assignment, participation or sub-participation;
- v. maintaining otherwise, a record of Data Subjects (whether or not there exists any relationship between Data Subjects and the Company) for present and future reference; and
- vi. purposes incidental, associated or relating to the abovementioned purposes.

2. In relation to employees (as and where applicable):



The purposes for which the data relating to the Employees may be used in connection with the employer and employee relationship and human resources management, including but not limited to the purposes as mentioned herein:

- i. processing employment application;
- ii. determining and reviewing salaries, bonuses and other benefits should be employed;
- iii. conducting reference check with previous employers;
- iv. conducting performance management process, promotion, transfer, job rotation, training, demotion, secondment, termination of employment, wherever applicable;
- v. monitoring compliance with internal rules of the Company;
- vi. any other purposes directly or indirectly relating to the compliance by the Company or any of the employment or statutory obligations; and
- vii. administering any affairs or benefits relating to the retirement and insurance plan of Employees; and
- viii. purposes incidental, associated or relating to the abovementioned purposes.

3. In relation to Other Individuals (as and where applicable):

The purposes for which the data relating to the Other Individuals may be used are as follows:

- i. engaging, managing, monitoring and assessing the business relationship with the suppliers, contractors, service providers, business partners and their staff who provide services to the Company;
- ii. organizing and delivering seminars for the Company;
- iii. facilitating the daily operation and administration of the above; and
- iv. purposes incidental, associated or relating to the abovementioned purposes.

Collection and Use of Personal Data

1. In relation to the collection of the personal data, the Data Subjects may visit the "Privacy Policy" on our website and/or (as and where applicable) the Employees with a copy of relevant Notice in connection with the collection of Employee records and/or (as and where applicable) will notify Other Individuals of the purpose of collection, classes of persons to whom the data may be transferred, their rights to access and correct the data, and other relevant information.\
2. In relation to the collection of the information and personal data on-line or when the Users communicate with the Company via Electronic Devices, the following provisions shall be



applicable to the Company's website or when the Users communicate with the Company via the Electronic Devices:

- i. This section is limited to the information collected on the Company's website, the Company's online advertisements and electronic communications. This section does not apply after the Users leave the Company's Website or when the users visit third-party's websites where the Company's online advertisements are displayed or links to third-party websites not operated or controlled by the Company.
- ii. By browsing the Company's Website, electronically responding to the Company's online advertisements, communicating with the Company via any Electronic Devices, the Users' consent to the Company's use of cookies and the Company's use of the Users' Information in the manner as set out in this section. The Users do not proceed further and do not provide the Information unless the Users' consent to the above.
- iii. The Company will record the information of visitors visiting the Company's Website through the web server access log (including the clicking date and time, IP address, pages clicked, browser type, device, operating system and Internet Banking account number (if applicable)). The Company might use the Users' record (and may combine with other personal information of the Users) for the purposes of improving the operation of this website, statistical analysis and marketing. The Company will keep the relevant information for an appropriate period of time based on the actual needs. The Company's web server access log will record the Users' information automatically by default. By continuing browsing the Company's Website, users are deemed to have given their consent for the Company to store, use and transfer the information in the above manner. Some of the Users' information including Users' personalized settings information will be gathered through the use of "cookies". Cookies are small bits of information that are automatically stored in the web browser in Users' Electronic Devices that can be retrieved by the Company's Website. The information collected by "cookies" is anonymous visitor's personalized settings information and contain no name or address information or any information that will enable anyone to contact the Users via any means. No Users' personal data will be collected or stored by the Company.
- iv. There are sections of the Company's Website where the Company specifically asks for the Users' personal data, for example, when completing online forms to submit an enquiry of product or service. If the Users do not consent to the same, please do not proceed further and do not provide the Users' personal data to the Company.

Retention of Personal Data

The personal data and information provided by Data Subjects and/or the Employees and/or the Users and/or Other Individuals will not be kept longer than necessary for the fulfillment of the purposes for which the personal data and information are or are to be used at the time of the collection and for compliance with the legal, regulatory and accounting requirements from time to time. The personal data would be retained for a reasonable period of time. All unnecessary personal data would be erased within a reasonable period of time.



All reasonable/practical measures would be taken to ensure security and confidentiality of the personal data during transmission.

Disclosure of Personal Data

The personal data and information would not be disclosed to other parties unless such disclosure is made in accordance with the Privacy Policy and/or (as and where applicable) the relevant Notice in connection with the collection of Employee records and/or the Data Subjects and/or the Employees and/or the Users and/or Other Individuals have been previously consented to and/or the disclosure is permitted or required by any law binding on the Company.

Security of Personal Data

The personal data and information provided to the Company are secured with restricted access by authorized personnel. Encryption technology is employed for sensitive data to protect the privacy of the Data Subjects, the Employees, the Users and Other Individuals during data transmission.

If the Company engages service providers to handle or process personal data (whether within or outside Hong Kong) on the Company's behalf, the Company would adopt contractual or other means to prevent unauthorized or accidental access, processing, erasure, loss or use of the data transferred to the service providers for processing.

Changes to the Privacy Policy Statement

The contents of this Statement may be amended from time to time. Please approach the Company and/or visit the Company's Website at www.bbmsl.com regularly for the Company's latest privacy policy.

Data Access Requests and Data Correction Requests

The Company would comply with and process all data access and correction requests in accordance with the provisions of the Ordinance.

[We comply with your data access request or data correction request within the time frame, if applicable, according to any applicable legislation, laws or regulations.]

The Company may impose a reasonable fee for complying with a data access request in accordance with the Ordinance.

Warranty Disclaimer

THE COMPANY'S WEBSITE ("SITE"), THE CONTENT AND THE SERVICES PROVIDED BY THE SITE ARE PROVIDED TO YOU ON AN "AS IS" BASIS WITHOUT WARRANTIES OF ANY KIND, EITHER EXPRESS OR IMPLIED. IN PARTICULAR, NO WARRANTY ABOUT MERCHANTABILITY, ACCURACY, FITNESS FOR A PARTICULAR PURPOSE,



TITLE AND NON-INFRINGEMENT OR ABSENCE OF COMPUTER VIRUS IS GIVEN IN CONNECTION WITH SUCH CONTENT AND INFORMATION.

Limitation of Liability

YOU WAIVE AND SHALL NOT ASSERT ANY CLAIMS OR ALLEGATIONS OF ANY NATURE WHATSOEVER AGAINST BBMSL LIMITED, ITS AFFILIATES OR SUBSIDIARIES, THEIR SPONSORS, CONTRACTORS, ADVERTISERS, VENDORS OR OTHER PARTNERS, ANY OF THEIR SUCCESSORS OR ASSIGNS, OR ANY OF THEIR RESPECTIVE OFFICERS, DIRECTORS, AGENTS OR EMPLOYEES (COLLECTIVELY, THE “RELEASED PARTIES”) ARISING OUT OF OR IN ANY WAY RELATING TO YOUR USE OF THE SITE OR THE CONTENT, INCLUDING, WITHOUT LIMITATION, ANY CLAIMS OR ALLEGATIONS RELATING TO THE ALLEGED INFRINGEMENT OF PROPRIETARY RIGHTS, ALLEGED INACCURACY OF CONTENT, OR ALLEGATIONS THAT ANY RELEASED PARTY HAS OR SHOULD INDEMNIFY, DEFEND OR HOLD HARMLESS YOU OR ANY THIRD-PARTY FROM ANY CLAIM OR ALLEGATION ARISING FROM YOUR USE OR OTHER EXPLOITATION OF THE SITE. YOU USE THE SITE AT YOUR OWN RISK. Without limitation of the foregoing, neither BBMSL Limited nor any other Released Party shall be liable for any direct, special, indirect or consequential damages, or any other damages of any kind, including but not limited to loss of use, loss of profits or loss of data, whether in an action in contract, tort (including but not limited to negligence) or otherwise, arising out of or in any way connected with the use of the Site or its content, including without limitation any damages caused by or resulting from your reliance on the Site or other information obtained from BBMSL Limited or any other Released Party or accessible via the Site, or that result from mistakes, errors, omissions, interruptions, deletion of files or email, defects, viruses, delays in operation or transmission or any failure of performance, whether or not resulting from acts of god, communications failure, theft, destruction or unauthorized access to BBMSL Limited or any other Released Party’s records, programs or Services.

Miscellaneous

The terms of this Privacy Policy Statement (“Terms”) constitute the entire agreement between you and BBMSL Limited regarding your use of the Site, and supersede all prior or contemporaneous communications whether electronic, oral or written between you and BBMSL Limited regarding your use of the Site. The section titles in the Terms are for convenience only and have no legal or contractual effect. If a court of competent jurisdiction determines that any provision of these Terms is invalid, unlawful, void or unenforceable, that provision shall be modified or severed to the maximum extent permitted by law; however, any and all other provisions shall remain valid and be given full force and effect in a valid and enforceable manner to accomplish the purposes of these Terms.

Contact Details

The persons to whom requests for access to data or correction of data or for information regarding policies and practices and kinds of data held is to be addressed is as follows:

 (852) 3910 5500  www.bbmsl.com  info@bbmsl.com

 Suite 1703-04, 17/F, Tower 2, Nina Tower, 8 Yeung Uk Road, Tsuen Wan, N.T., Hong Kong



Address : Suite 1703-04, Tower 2, Nina Tower, 8 Yeung Uk Road, Tsuen Wan,
New Territories, Hong Kong.
Telephone : (852) 3907 0307
Facsimile : (852) 3156 1720
Email : service_ops@bbmsl.com

If there is any inconsistency between the English version and the Chinese version of this Statement, the English version shall prevail.

May 2022