

## **Personal Information Collection Statement for the Infrastructure Financing and Securitisation Business of The Hong Kong Mortgage Corporation Limited (PICS)**

*A privacy notice or personal information collection statement (**Privacy Notice**) may be provided to you by the lead arranger or agent bank or other entities performing similar functions under the infrastructure loan and related arrangements. Such a Privacy Notice shall govern the manner in which your Personal Information may be collected, used, transferred and/or disclosed by the parties and/or to other persons or entities described therein. In the absence of such a Privacy Notice or to the extent not already covered by the Privacy Notice, the provisions of the below PICS shall apply in relation to any of your Personal Information collected or obtained by the HKMC (relevant terms as defined below).*

In this PICS:

**Agreement** means the relevant agreement setting out the terms of the infrastructure loan facility and related financing and security arrangements;

**Borrower** means each party so described in the Agreement;

**Finance Party** means each party that provides finance under the Agreement and any agent or security trustee appointed under such Agreement;

**HKMC** means The Hong Kong Mortgage Corporation Limited and **HKMC Group** means the HKMC and its subsidiaries and subsidiary undertakings. The terms **we**, **our** and **us** mean one or more members of the HKMC Group (including our successors and assigns), as the context requires; and

**Personal Information** means any information (including an opinion) relating to an identified or identifiable individual.

For further information about the privacy policies and practices in relation to the Personal Information that we handle (including the accuracy, retention and security of Personal Information), please refer to the Privacy Policy Statement of the HKMC Group (**PPS**) (see below).

### **1. Collection of Personal Information**

In relation to the infrastructure financing and securitisation business and related programmes, services and products from time to time provided or operated by any member of the HKMC Group (**IFS Business**), we may collect or obtain Personal Information of various categories of individuals, including without limitation (collectively **you** or **your**):

- (a) shareholders, directors, controlling persons, authorised signatories, officers, managers, staff, agents and advisers of the Borrower and its related entities;
- (b) staff, representatives, agents and authorised signatories of a business counterpart (including any Finance Party, banks and other financial institutions) under or in connection with any IFS Business transactions entered into or contemplated by any member of the HKMC Group; and
- (c) other relevant individuals of any IFS Business transactions such as guarantors and persons providing financial or credit support for/to the Borrower or service providers.

Such Personal Information may include but is not limited to identification information (including names, identity card numbers or passport numbers), address, age, date of birth, nationality, gender, copies of official identification documents, online identifiers, business contact details, information as regards your official capacity and employment status and information collected from publicly available resources. For the

purposes of performing our know-your-customer, anti-money laundering or other regulatory-related checks, we may also collect more sensitive Personal Information about you which includes information about criminal convictions and offences and negative media reports.

Failure to provide the Personal Information requested may result in us being unable to assess, screen or negotiate the terms of the IFS Business transactions or proposed transactions or to provide or operate the programmes, services or products in relation to or under our IFS Business.

We may collect your Personal Information not only directly from you, but also from the Borrower, any guarantor, any Finance Party or any related entity of a Finance Party.

## **2. Purpose of collection of Personal Information**

Depending on your role in the IFS Business transactions, we may collect and use your Personal Information for one or more of the following purposes:

- (a) acquiring, providing and/or managing facilities offered to the Borrower under the Agreement including entering into a transfer, assignment, participation or other agreement in connection with the Borrower's facilities;
- (b) evaluating loans in which we are considering acquiring an interest and monitoring the performance of loans for credit monitoring and other purposes;
- (c) identifying and/or verifying the identity of you, the Borrower or a business counterpart with whom we are dealing;
- (d) establishing and managing relationships with business counterparts with whom we engage in IFS Business;
- (e) communicating with you and handling any feedback, request, enquiry or complaint made by or otherwise involving the Borrower and/or a business counterpart;
- (f) complying with any obligations pursuant to any applicable laws, rules, regulations, codes of practice, guidelines or international and intergovernmental agreements, including but not limited to compliance with anti-money laundering, counter-terrorist financing, sanctions, tax or anti-corruption laws, regulations, guidelines and agreements;
- (g) identifying, preventing or investigating any actual or suspected fraud, unlawful activity or misconduct;
- (h) any internal management and reporting purpose;
- (i) any purpose in connection with an actual or proposed assignment or transfer of any of our interests in any facilities or loans under the IFS Business; and
- (j) complying with the terms of and enforcing our rights under any Agreement to which we are a party or in which we have an interest.

## **3. Disclosure of Personal Information**

Any Personal Information held by us will be kept confidential but we may disclose or transfer such information to the following parties within or outside Hong Kong for or in relation to the purposes described in paragraph 2 above:

- (a) any member of the HKMC Group;
- (b) any Finance Party and its related entities;
- (c) regulatory bodies, government agencies, law enforcement bodies, courts and parties to whom we are authorised or required by law or court order to disclose information including in connection with lawsuits, enquiries, proceedings or investigations;
- (d) participants in payments systems (including payment organisations and merchants) and other financial institutions;

- (e) the Borrower's legal representatives or anyone else acting for the Borrower or guarantor in connection with the Borrower's facilities;
- (f) any provider of a guarantee or other credit support for the Borrower's obligations to the Finance Parties;
- (g) any professional advisers or service providers who are under a duty of confidentiality to keep such information confidential; and
- (h) any person with whom a Finance Party may enter into a transfer, assignment, participation or other agreement in connection with the Borrower's facilities.

#### **4. Automated Decision Making and Profiling**

We do not carry out decision making and profiling based solely on automated processing of your Personal Information.

#### **5. Access and Correction Rights**

You may access or seek correction of your Personal Information by making a request in writing to our Data Protection Contact designated to handle such request.

Data Protection Contact  
The HKMC Group  
Level 65, International Commerce Centre  
1 Austin Road West  
Kowloon, Hong Kong

Email address: [data\\_subject\\_requests@hkmc.com.hk](mailto:data_subject_requests@hkmc.com.hk)

We have the right to charge a fee which is not excessive for the processing of any data access request, to the extent permitted pursuant to applicable laws or regulations.

If you have any questions, you may contact us using the above details.

Additional terms and information relating to our processing of your Personal Information apply where you are located in the European Economic Area (**EEA**) or the United Kingdom (**UK**) and where your Personal Information is subject to the data protection laws of the EEA or the UK. These additional terms and information are set out in the Appendix of this PICS.

*In case of inconsistency between the English and Chinese versions of this PICS, the English version shall prevail.*

*(Effective from February 2026)*

## Appendix: EEA and UK Specific Provisions

Where you are located in the EEA or the UK and where your Personal Information is subject to the data protection laws of the EEA or the UK (including the General Data Protection Regulation (**GDPR**)), the following provisions also apply in addition to, and are supplemental to, the terms of the PICS.

To the extent that there is a conflict, the provisions of this Appendix shall take precedence over the terms of the PICS and the PPS in relation to the collection, processing, use, disclosure, correction and/or erasure of Personal Information subject to EEA or UK data protection laws.

In this Appendix:

**Contract Performance** means where we are required to collect and process your Personal Information in order to perform our obligations in a contract we have entered into with you, or to take steps to enter into such a contract (Article 6(1)(b) GDPR);

**Controller** means the entity which, alone or jointly with others, determines the purposes and means of the collection, use and processing of your Personal Information;

**Explicit Consent** means where you have given explicit consent to the processing of Special Categories of Personal Information for one or more specified purposes. Where applicable, consent may be withdrawn by contacting us in accordance with paragraph 5 of the PICS. If consent is withdrawn, we may be prevented from fulfilling the above specified purposes that require the use and processing of such Personal Information (Article 9(2)(a) GDPR);

**Legal Claims** means where the processing of Special Categories of Personal Information is necessary for us to establish, exercise or defend any legal claims (Article 9(2)(f) GDPR);

**Legal Obligations** means where we need to use your Personal Information to comply with our legal obligations as set out in EEA or UK laws (as applicable) (Article 6(1)(c) GDPR);

**Legitimate Interests** means where we have a legitimate interest in using your Personal Information where this is not outweighed by any interests that you may have, or any prejudice that you may suffer, from the relevant use of the Personal Information (Article 6(1)(f) GDPR);

**Public Availability** means where you have made Special Categories of Personal Information about yourself public (Article 9(2)(e) GDPR);

**Special Categories of Personal Information** means Personal Information that may reveal your physical/mental health, race/ethnicity, religious/similar beliefs, political affiliation, trade union membership, sexual orientation/sex life, genetic/biometric data, and shall for the purpose of this Appendix, include in certain circumstances, criminal convictions data; or any other categories stipulated by EEA or UK laws (as applicable); and

**Substantial Public Interest** means where we need to process Special Categories of Personal Information for reasons of substantial public interest as set out in EEA or UK laws (as applicable) (Article 9(2)(g) GDPR).

## **Controller**

The applicable company of the HKMC Group that collects your Personal Information is generally the Controller of the Personal Information under EEA and UK data protection laws. This company will generally be the HKMC.

If you have questions about your rights or concerns regarding the way in which your Personal Information is used, please contact our Data Protection Contact at the address(es) specified under paragraph 5 of the PICS above.

## **Lawful Bases for Processing**

Under EEA and UK data protection laws, the use and disclosure of Personal Information must be based on one or more lawful bases and we are required to set out the lawful bases in respect of each use made of your Personal Information.

For the purposes (including disclosures) listed in paragraphs 2 and 3 of the PICS:

- (a) we generally use and disclose your Personal Information on the basis of our Legitimate Interests (in order to perform our obligations, operate the IFS Business in a compliant manner, conduct, improve, develop and amend the IFS Business, and comply with our legal and regulatory obligations or internal policy requirements);
- (b) to the extent you are a party to a contract with us, we may use and disclose your Personal Information on the basis of Contract Performance;
- (c) where applicable, we may use and disclose your Personal Information on the basis of our Legal Obligations; and
- (d) where the use and disclosure involves the processing of Special Categories of Personal Information, the lawful bases we usually rely on are Substantial Public Interest (e.g. for the purpose of preventing or detecting fraud or unlawful acts), Public Availability and/or Legal Claims. In certain cases, we may ask for your Explicit Consent.

## **Transfer of Personal Information outside the EEA and the UK**

Personal Information relating to you may be held in, or transferred to, countries/territories outside of the EEA and the UK (e.g. Hong Kong) by our staff, affiliates, service providers, business partners and other recipients as set out in paragraph 3 of the PICS.

In some of these countries/territories, the local data protection laws may be of a lower standard than EEA and UK data protection laws, and may provide you with fewer data protection rights.

We take steps to ensure that international transfers of Personal Information are conducted in accordance with the requirements of applicable EEA and UK data protection laws, which may include utilising appropriate legal mechanisms to legitimate the transfers such as EEA/UK-approved standard contractual clauses. In certain cases, we may implement additional safeguards and security measures, such as encryption.

Please contact us if you want further information on the specific safeguards applied to the export of your Personal Information to a destination outside the EEA or the UK (if applicable).

## Your Rights under EEA and UK Data Protection Laws

In addition to your rights to access and to correct your Personal Information as set out in paragraph 5 of the PICS, you may, under certain circumstances, also have the right to:

- (a) be provided with details about the Personal Information we hold about you;
- (b) withdraw consent where our lawful basis is your consent;
- (c) be provided with a copy of your Personal Information you have provided to us in a machine-readable format so that you can transfer it to another provider or ask us to transfer this to another data controller (where our lawful basis for the processing is Contract Performance or your consent);
- (d) require us to delete your Personal Information (including where our lawful basis for the processing is your consent or our Legitimate Interests);
- (e) restrict how we use your Personal Information whilst a complaint is being investigated;
- (f) object to our processing of your Personal Information (where our lawful basis for the processing is our Legitimate Interests); and
- (g) ask us not to reach decisions affecting you using automated processing or profiling.

Additionally, if you are based in France, you have the right to define directives on the processing of your Personal Information after your death in compliance with the French data protection act (law n°78-17 of 6 January 1978 as amended).

Your exercise of these rights is subject to certain exemptions such as to safeguard the public interest (e.g. prevention or detection of crime) and our interests (e.g. maintenance of legal privilege). If you exercise any of these rights, we will check your entitlement and will respond in most cases within a month.

If you are not satisfied with our use of your Personal Information or our response to any exercise of your rights, you have the right to lodge a complaint with your appropriate EEA or UK data protection authority (see [https://edpb.europa.eu/about-edpb/about-edpb/members\\_en](https://edpb.europa.eu/about-edpb/about-edpb/members_en) and <https://ico.org.uk/global/contact-us/>).

No fee will be charged pursuant to paragraph 5 of the PICS and paragraph 4.2 of the PPS in relation to the exercise of rights afforded to you under EEA and UK data protection laws, unless the exercise of such rights is manifestly unfounded or excessive.

For further information about the accuracy, retention and security of Personal Information, please refer to the PPS.

## Data Protection Representative in the EEA and the UK

Pursuant to the EEA and UK data protection laws, we have appointed European Data Protection Office (**EDPO**) and EDPO UK Ltd (**EDPO UK**) as our Data Protection Representative in the EEA and the UK respectively. You may contact them regarding matters pertaining to our processing of your Personal Information:

- (a) by using their online request form:  
EDPO: <https://edpo.com/gdpr-data-request/>  
EDPO UK: <https://edpo.com/uk-gdpr-data-request/>
- (b) by writing to:  
EDPO at Avenue Huart Hamoir 71, 1030 Brussels, Belgium  
EDPO UK at 8 Northumberland Avenue, London WC2N 5BY, United Kingdom

# Privacy Policy Statement of the HKMC Group (PPS)

## 1. Introduction

In this Statement, unless the context does not permit or otherwise requires,

**Company, we, our** and **us** mean the company named in the document collecting the relevant data (which is a member of the HKMC Group) and its successors and assigns;

**Data Subject**, in relation to personal data, means the individual who is the subject of the personal data; and

**HKMC Group** means The Hong Kong Mortgage Corporation Limited and its subsidiaries and subsidiary undertakings.

This Statement is intended mainly to inform the Data Subject of our policies and practices in relation to our handling of personal data as well as the kinds of personal data which we hold and the main purposes for which such personal data is or is to be used and to whom any data access or correction request should be addressed.

## 2. Our Policy

We respect personal data privacy and it is our policy to comply with the Personal Data (Privacy) Ordinance (**PDPO**), relevant codes of practice which may be issued by the Office of the Privacy Commissioner for Personal Data, Hong Kong from time to time and other applicable data protection laws and regulations. We will ensure that our staff members comply with the policies and practices set out in this Statement and maintain appropriate standards of security and confidentiality in meeting such commitment.

## 3. Our Practices

*Paragraph 3.1 below does not apply to our Infrastructure Financing and Securitisation Business. Please refer to paragraph 3.4 below for details.*

### 3.1 Customers

(a) **Types of Personal Data Held:** In relation to our products/services/events (including their amendments and enhancements as may be effected from time to time) relating to our financing, loans and loans acquisition, retirement planning (such as our AMIGOS by HKMC loyalty programme), insurance and credit support businesses (such as our mortgage purchase programme, mortgage insurance programme, reverse mortgage programme, SME financing guarantee scheme and policy reverse mortgage programme) and their administration, operation, servicing, marketing, maintenance, enhancement and support from time to time provided or operated by us (**Services**), we collect or obtain, hold and use personal data of various categories of individuals:

- (i) Such personal data may, depending on the Services concerned, include but is not limited to identification information (including names, Hong Kong Identity Card numbers or passport numbers), contact details, address, age, date of birth, place of birth, jurisdiction(s) of tax residence, tax identification number(s) in that/those jurisdiction(s), gender, relationship with other Data Subjects, personal profile, financial information, health condition, medical history, medical diagnosis, treatment and related expenses, bank account information, employment and remuneration information, educational and professional qualifications, credit standing, bankruptcy/debt restructuring status, information on property(ies), insurance policy(ies) and

other assets held or owned as well as any information provided in the course of applications, requests, enquiries, complaints or feedback and information from the Data Subject's use of or access to our mobile application(s) (**App(s)**) and websites (such as behavioural information, activities/browsing history, internet protocol addresses and push token); and

- (ii) Such categories of individuals include but are not limited to:
- (1) existing and prospective applicants, borrowers or customers/users (including policyowner(s), claimant(s), beneficiary(ies), payee(s) and/or insured(s)) under or in connection with any of our Services;
  - (2) shareholders, directors, controlling persons, officers and managers of a corporate applicant, borrower or customer/user and its subsidiaries and related entities;
  - (3) partners or members of a partnership, or representatives, agents, attorneys or nominees of an applicant, borrower or customer/user; and
  - (4) other relevant individuals of any of our Services such as sureties and persons providing financial or credit support for/to a customer or borrower, any person who is a joint bank account holder with a customer or borrower where such bank account is or will be used to make or receive payments, and individuals providing supporting services, in relation to or under the Services.

(b) ***How We Use the Personal Data:*** The purposes for which personal data of the Data Subject may be used will vary depending on the circumstances and context of its collection, but the purposes perceived by us will include the following:

- (i) administering, maintaining, operating, servicing, marketing, enhancing and supporting our Services;
- (ii) processing, screening and evaluating any applications, requests, enquiries or complaints involving the Data Subject relating to our Services;
- (iii) providing subsequent or ongoing services in relation to our Services involving the Data Subject, including but not limited to providing information and administering the policies or guarantees issued or the loans or credit supports granted;
- (iv) any purposes in connection with any claim or requests made by or against or otherwise involving the Data Subject in respect of our Services, including the related verification, screening and investigation work;
- (v) detecting, investigating and preventing fraud, crime, wrongdoing or irregularity;
- (vi) facilitating design of products/services/events of any members of the HKMC Group;
- (vii) conducting research and maintaining databases for marketing, statistical, actuarial, product development, research or other purposes;
- (viii) matching any personal data held which relates to the Data Subject from time to time for any of the purposes listed herein and verifying data or information provided by any third party;
- (ix) creating and maintaining Data Subject profile and segregation and business model and performing risk management;
- (x) evaluating any future application by or involving the Data Subject in relation to our Services;
- (xi) registering Data Subjects and administering the provision of Services through telecommunications or online channels and/or platforms, or App(s);
- (xii) conducting underwriting, identity and credit checks and debt collection;
- (xiii) offering, providing and marketing to the Data Subject the Services of the Company, other members of the HKMC Group or our business partners;
- (xiv) carrying out business co-operation with the Data Subject (including referral or other modes of co-operation);
- (xv) sending to the Data Subject newsletters and materials (whether printed or accessible or viewable through online means) about educational, recreational or other events of any member of the HKMC Group;

- (xvi) providing benefit(s) to the Data Subject for relationship management purposes;
- (xvii) making disclosures as required by any applicable law, rules, regulations, codes of practice or guidelines or for assisting law enforcement purposes, investigations or enquiries by police or other government or regulatory authorities in Hong Kong or elsewhere;
- (xviii) complying with the laws, regulatory requirements and any other rules, guidelines, orders or requests of any governmental or regulatory body or law enforcement agency in any applicable jurisdiction which we are expected to or would normally comply with;
- (xix) complying with any obligations, requirements, policies, procedures, measures or arrangements for sharing personal data and information within the HKMC Group and/or any other use of personal data and information for compliance with sanctions or prevention or detection of money laundering, terrorist financing or other unlawful or prohibited activities or conduct, including but not limited to screening of applications and ongoing monitoring for sanctions and of relevant databases;
- (xx) enabling an actual or potential assignee of us, or participant or sub-participant of our rights in respect of the Data Subject to evaluate the transaction intended to be the subject of the assignment, participation or sub-participation; and
- (xxi) purposes directly relating to any of the above.

(c) **Disclosing the Personal Data:** Personal data will be kept confidential but, subject to the provisions of any applicable law, may be provided or transferred to the following parties within or outside Hong Kong, including cloud service providers, for the purposes outlined in paragraph 3.1(b) above:

- (i) any member of the HKMC Group;
- (ii) any broker, referrer or introducer of the Data Subject in Hong Kong or elsewhere;
- (iii) any co-applicant or co-borrower, and any person proposing to provide or providing any financial or credit support in relation to the Data Subject's obligations in connection with our Services;
- (iv) any business partner which has participated in programmes operated by any member of the HKMC Group in relation to our Services;
- (v) any person in connection with any claims made by or against or otherwise involving the Data Subject in respect of any Services provided by the Company or any member of the HKMC Group;
- (vi) any agent, contractor or third party, which provides administrative, audit, data-processing (including online cloud processing), document management, technology, telecommunication, storage (including online cloud storage), database, payment or other services (including direct marketing and push and/or alert notification services) to any member of the HKMC Group in Hong Kong or elsewhere under a duty of confidentiality to the same;
- (vii) where applicable, any insurer or reinsurer (including any re-insurers of such reinsurer) of, or any entity providing financial support in relation to our Services;
- (viii) any valuer, medical service provider or provider of products or services which is, or will be paid by funds drawn from the Services;
- (ix) credit reference agencies (including the operator of any centralised database used by credit reference agencies), and, in the event of default, debt collection agencies;
- (x) any agent, auditor, accountant, tax adviser, lawyer, consultant or other professional adviser;
- (xi) any court, tribunal or administrative, governmental or regulatory body or law enforcement agency in Hong Kong or elsewhere (including local or foreign tax authorities); and
- (xii) any actual or potential assignee, transferee, participant or sub-participant of our rights or business.

**(d) Use and Provision of Personal Data in Direct Marketing**

- (i) We intend to:
- (1) use the names, contact details, Services portfolio information, transaction pattern and behaviour, financial, employment or other background and demographic data of the Data Subject held by us from time to time for direct marketing and we cannot use such data unless we have received the Data Subject's consent or indication of no objection; and
  - (2) conduct direct marketing in relation to the following classes of products/services/events:
    - insurance, financial services, retirement planning and related products/services/events; and
    - reward, loyalty, co-branding or privilege programmes, and related products/services/events.
- (ii) The above products/services/events may be provided or solicited by us and/or:
- (1) any member of the HKMC Group;
  - (2) third-party financial institutions and insurers; and
  - (3) third-party reward, loyalty, co-branding or privilege programme providers or operators.
- (iii) In addition to marketing the above products/services/events, we may provide the Data Subject's information described in paragraph 3.1(d)(i)(1) to all or any of the persons described in paragraph 3.1(d)(ii) above for use by them in marketing those products/services/events, and we require the Data Subject's written consent (which includes an indication of no objection) for that purpose.

***If the Data Subject does not wish us to use or provide to other persons his personal data for use in direct marketing as described above, the Data Subject may exercise his opt-out right by notifying us.***

**3.2 Job Applicants, Staff and Directors**

- (a) ***Types of Personal Data Held:*** We collect or obtain, and hold, the personal data of persons who are (1) applying for employment, (2) employed or appointed by, or seconded to us as one of our officers or staff, (3) hired or engaged to provide services to us under any contract or form of arrangement other than employment, appointment or secondment (except our Business Contacts as described in paragraph 3.3(a) below), (4) our prospective officers and staff (including secondees and interns), (5) no longer our officers and staff (including secondees and interns), (6) family members of our officers and staff who will enjoy or who are enjoying any of our staff benefits and (7) emergency contacts of our officers and staff.

Such personal data may include but is not limited to identification information (including names, Hong Kong Identity Card numbers or passport numbers), biometric data (e.g. fingerprint), health or medical records, age, contact details, curriculum vitae, past employment and remuneration-related information, educational and professional qualifications, training records, appraisal information and references as well as relationship with our officers and staff.

- (b) ***How We Use the Personal Data:*** Generally, we hold and use such personal data mainly for the following purposes:
- (i) consideration of employment, appointment or secondment as one of our officers or staff;
  - (ii) consideration of hiring or engagement to provide services to us as one of our officers or staff under any contract or form of arrangement other than employment, appointment or secondment;
  - (iii) recruitment, staff supervision, training and human resources management;
  - (iv) determination and review of salaries, bonuses and other benefits;
  - (v) consideration for and facilitating appraisals, promotion, career development, staff planning,

- training, secondment or transfer;
- (vi) administration of staff benefits, compensation, reimbursements, payroll and entitlements;
- (vii) provision of staff references;
- (viii) administration of the mandatory provident fund schemes (**MPF**);
- (ix) making tax returns;
- (x) staff disciplinary matters;
- (xi) review of decision on employment, appointment, secondment or hiring or engagement under any contract or other form of arrangement;
- (xii) application, registration, waiver(s) or exemption(s) in relation to any licence, approval or registration required for our officers and staff to carry out duties;
- (xiii) compliance with any disclosure, reporting, filing or notification or other similar obligation pursuant to any judicial, statutory or regulatory requirement including compliance with applicable laws, regulations and guidelines, whether of Hong Kong or any other relevant jurisdiction, which we are bound by or any failure to comply with will result in adverse consequences (sanctions, penalties, imprisonment, etc.) for us or our officers and staff, including but not limited to screening of applications and ongoing monitoring for sanctions and of relevant databases;
- (xiv) conducting user authentication on our systems or devices (e.g. Windows operating systems) and providing access to authorised resources for selected users;
- (xv) monitoring and taking action in relation to compliance with legal, regulatory and internal policy requirements;
- (xvi) contacting emergency contacts of our officers and staff in case of emergencies; and
- (xvii) providing and supporting human resources functions not mentioned above, including but not limited to recruitment, employment, compensation and benefits and learning and development.

(c) **Disclosing the Personal Data:** Such personal data held by us will be kept confidential but we may disclose or transfer such information to the following parties within or outside Hong Kong for the purposes set out in paragraph 3.2(b) above:

- (i) any member of the HKMC Group to which the Data Subject may be seconded or which the Data Subject may be assigned to provide any services;
- (ii) any authorized insurer, licensed insurance agency, licensed insurance broker company and any other entity as required or recommended by any relevant regulatory body from time to time;
- (iii) any bank in relation to remuneration arrangements;
- (iv) any bank, fund, professional investor, broker and arranger in relation to MPF arrangements;
- (v) any service provider (such as payroll administrators and recruitment system platform provider) providing administrative or other support services for staff matters and/or us;
- (vi) any auditor, accountant, tax adviser, lawyer, consultant or other professional adviser;
- (vii) any court, tribunal, administrative, governmental or regulatory body or law enforcement agency in relation to the purposes set out in paragraphs 3.2(b)(xiii) and (xv) above; and
- (viii) any person with the Data Subject's consent (including any potential future employer).

### 3.3 Business Counterparts

(a) **Types of Personal Data Held:** We collect or obtain, and hold, the personal data of persons who serve as officers, agents or representatives of the Services participants, potential and actual vendors/suppliers of goods, services and support to us and potential and actual business counterparts (**Business Contacts**). Such personal data may include but is not limited to identification information, contact details, and information as regards Business Contacts' official capacity and employment status.

(b) **How We Use the Personal Data:** Generally, we hold and use Business Contacts' personal data mainly

for the following purposes:

- (i) managing our business relationships;
- (ii) communicating on business, administrative, logistical and/or promotional arrangements in relation to our Services and/or any function and activity related thereto;
- (iii) communicating on quotations or bids for goods or services;
- (iv) liaising on goods, services and/or support contracted for or agreed upon;
- (v) complying with obligations and enforcing rights under terms of contracts or arrangements we are a party to;
- (vi) handling any feedback, requests, claims, enquiries or complaints;
- (vii) ascertaining authority for execution of legal documents; and
- (viii) complying with any disclosure, reporting, filing or notification or other similar obligation pursuant to any judicial, statutory or regulatory requirement including compliance with applicable laws, regulations and guidelines, whether of Hong Kong or any other relevant jurisdiction, which we are bound by or any failure to comply with will result in adverse consequences (sanctions, penalties, imprisonment, etc.) for us or our officers and staff.

(c) **Disclosing the Personal Data:** Business Contacts' personal data held by us will be kept confidential but we may disclose or transfer such information to the following parties within or outside Hong Kong for the purposes set out in paragraph 3.3(b) above:

- (i) any auditor, accountant, tax adviser, lawyer, consultant or other professional adviser;
- (ii) any service providers (such as technical experts, due diligence service providers, etc.) providing technical and other expert advice and services including advice on any quotation for goods and/or services;
- (iii) any non-governmental organisations providing community, educational or charitable services;
- (iv) other Services participants; and
- (v) any court, tribunal or administrative, governmental or regulatory body in relation to the purposes set out in paragraph 3.3(b)(viii) above.

### 3.4 Infrastructure Financing and Securitisation Business

In relation to the infrastructure financing and securitisation business and related programmes, services and products from time to time provided or operated by us in connection with such business (**IFS Business**), we may collect or obtain, hold and use personal information of various categories of individuals.

For further details about our collection, processing, use, disclosure, correction and/or erasure of such personal information (including in relation to individuals located in the European Economic Area or the United Kingdom), please refer to the "Personal Information Collection Statement for the Infrastructure Financing and Securitisation Business of The Hong Kong Mortgage Corporation Limited (**PICS**)" (see above).

### 3.5 Use of Cookies

We use cookies and/or similar tracking technologies (**Cookies**) on the websites/App(s) from time to time operated by us. Cookies are small text/data files that are automatically stored in the mobile/web browser of a visitor's/user's internet-enabled device(s) (e.g. computer, smartphone or tablet) while the visitor/user is visiting/using our websites/App(s), and can be retrieved by us when the visitor/user returns to our websites/uses or accesses our App(s).

For more information on how we use Cookies and what we use them for, please see our "Cookie Policy"

which is available on request.

### **3.6 Accuracy and Retention of Personal Data**

We have certain procedures in place to maintain, so far as is reasonably practicable, the accuracy, completeness and relevance of the personal data held by us in relation to the purposes for which the data is used. We aim to keep the personal data accurate and updated. However, we rely primarily on the relevant Data Subject to disclose all material information to the Services participant(s) (which will update us) or us, as appropriate, and to inform the Services participant(s) and/or us of any inaccuracy or changes in such information.

We maintain and execute retention policies of records containing personal data to ensure that such personal data is not kept longer than necessary for the fulfilment of the purposes for which it is or is to be used. Different retention periods apply to the various kinds of personal data collected or obtained and held by us in accordance with our internal policies on retention of personal data, and also as prescribed or permitted by applicable laws and regulations.

For further details, please contact our Data Protection Officer or Contact whose contact details are set out in paragraph 4.1 below.

### **3.7 Security of Personal Data**

We take appropriate steps to protect the personal data we hold against unauthorised or accidental access, processing, erasure, loss or use of the personal data. These steps include restricting physical and electronic access to personal data on a “need-to-know” and “need-to-use” basis, and having in place internal security policies and practices which require our officers and staff to comply with the requirements of the PDPO and other applicable laws and regulations. We also provide relevant training, including induction and ongoing training, to officers and staff to handle personal data properly.

### **3.8 Outsourcing Arrangements**

Our internal information technology (IT) systems are developed and maintained by our in-house staff and local third-party service provider(s). The third-party service provider(s) does/do not have access to personal data stored in our IT systems except when carrying out maintenance/checking/trouble shooting supervised by our IT staff. Where we engage external third party to handle or process information, we use contractual or other reasonably practicable steps to prevent unauthorised or accidental access, processing, erasure, loss or use of any personal data and, where applicable, require such third-party data processor not to keep the relevant data longer than is necessary for processing of the data.

## **4. Data Access Request and Data Correction**

**4.1** The Data Subject may request access to or correction of his personal data by making a request in writing to our Data Protection Officer at Level 65, International Commerce Centre, 1 Austin Road West, Kowloon, Hong Kong.

Data Subjects located in the European Economic Area or the United Kingdom and involved in the IFS Business transactions may have additional rights under relevant laws and regulations, and may write to our Data Protection Contact as specified in the PICS for exercising their rights.

**4.2** We may charge a fee which is not excessive for processing any data access request, to the extent permitted pursuant to applicable laws or regulations.

## **5. Enquiries**

Should the Data Subject have any query on this Statement or wish to obtain further information on our privacy policies and practices, please contact our Data Protection Officer or Contact whose contact details are set out in paragraph 4.1 above.

## **6. No Limitation of Rights**

Nothing in this Statement shall limit any rights of the Data Subject under the PDPO and other applicable laws and regulations.

## **7. Amendment of this Statement**

This Statement may from time to time be revised or updated by us.

**The HKMC Group**  
**February 2026**