

Data Privacy Policy

Updated as at 16 January 2023

The following sets out how Pioneer Asset Management Limited (“we”, “us”, “Pioneer” or the “Company”) will collect, use, store, share, transmit, delete or otherwise process (collectively, “process”) your personal data during our operation of the website <https://www.pioneer-am.com/> (the “Website”). Personal data means any information relating to you directly or indirectly, from which it is practicable for your identity to be directly or indirectly ascertained, or such wider definition as may be prescribed in the Personal Data (Privacy) Ordinance (Cap. 486 of the laws of Hong Kong).

The standard of personal data protection set out in this policy will be used by us to provide adequate and consistent protection for the processing of your personal data.

To ensure that you can make informed decisions and feel confident about providing your personal data to us, we outline in this policy our principles and your rights concerning the collection, handling, and use of your personal data. We shall only process your personal data in accordance with these principles.

- **Accountability:** we value your privacy and aim to protect it.
- **Collection:** we will only collect your personal data that is needed and by lawful and fair means, including but not limited to:
 - your personal information (e.g., your name, gender, date of birth, passport or other personally identifiable information, your photo, your bank account details);
 - your contact information (e.g., telephone number, mailing addresses, email address);
 - your business information (e.g., company name/ address, registration details);
 - information when you use our Website (e.g., behavioural information, location information, browser details, IP addresses, user acquisition data) – please also see our Cookies Policy.

We will collect your personal data:

- when you provide such data to us directly by phone, mail or email;
 - when you submit such data to us on the Website (for example, by completing and submitting any forms);
 - from third parties such as co-hosts or co-presenters in marketing events;
 - from publicly available sources of information;
 - when you navigate through the Website; and
 - when we are legally required to do so.
- **Data Sharing:** we may use the personal data collected in order to: (i) provide the Services you require; (ii) operate, improve and maintain our Services; (iii) respond to any queries or feedback you may have; (iv) verify your identity and location; (v) assess whether you are eligible to access the Website; (vi) send you our news and publications; (vii) communicate with you about us, our Services and our marketing materials; (viii) track your activities on the Website; (ix) conduct data analyses and general research; (x) maintain security of the Website; and (xi) detect fraud or criminal activity. We will share your personal data with third parties where it is necessary to satisfy the purposes for which the data is collected as set out above, including without limitation:
 - our staff who need the information to discharge their duties;

- our affiliates for marketing or sales outreach;
- co-hosts or co-presenters for authorised and managing marketing events;
- our service providers for data analyses;
- any person or entity to whom we are under an obligation to make disclosure under applicable laws, regulations or guidelines issued by government, regulatory or other authorities; and
- any person you have authorised to interact with us on your behalf.

We will never sell your personal data to any third party.

- **Processing:** we will process your personal data fairly and only for those purposes we have told you, for purposes permitted by you or as permitted by applicable law. In addition, you may object to certain types of processing as expressly permitted by applicable law. The personal data that we collect may be transmitted to and stored in the data centres of third-party data storage provider(s) in or out of Hong Kong.
- **Direct marketing:** We may from time to time use your personal data, and/or provide your personal data to our affiliates without any gain, in order to send you marketing materials about, without limitation, events, programmes and newsletters. We may not use your personal data for direct marketing or provide your personal data to third parties for direct marketing unless we have received your consent. You may opt out of receiving marketing communications at any time by submitting an “unsubscribe” request. Such request can be made by (i) clicking the “unsubscribe” button at the bottom of our marketing communications or (ii) sending us an email <info@pioneer-am.com> with your full name and contact details. We will then stop sending you any marketing related communication or providing your personal data to a third party for use by that party in direct marketing. We will also notify any third party to whom your personal data has been so provided to stop using the data in direct marketing. Please note that you may continue to receive marketing communications for a short period after changing your preferences while we or the third parties are updating the systems. If your personal data is used in any direct marketing communications, you have the right to request that we provide you with the source of that personal data. There is no fee for requesting this information. We will provide you with the source of personal data unless it is impracticable or unreasonable to do so.
- **Data Quality:** we use appropriate technology and well-defined practices to process your personal data promptly and accurately. We will not keep your personal data longer than is necessary, except as otherwise required by applicable law.
- **Security and Confidentiality:** we will keep your personal data confidential and limit access to your personal data to those who specifically need it to conduct their business activities, except as otherwise permitted by applicable law. We refer to industry standards and use reasonable administrative, technical, and physical security measures to protect your personal data from unauthorised access, destruction, use, modification, or disclosure.
- **Disclosure:** subject to any legal, statutory, regulatory or accounting requirements, there may be circumstances under which we may disclose your personal data to third parties (including but not limited to regulators and auditors) to whom we are under an obligation or otherwise required to make disclosure.
- **Data Retention:** subject to any legal, statutory, regulatory or accounting requirements, the personal data you provide to us will be kept by us in the appropriate form only for as long as is necessary to fulfil the purposes of providing you with the Services after which it will be destroyed.
- **Data Security:** in order to ensure the correct use and to maintain the accuracy of the personal data collected from you, as well as preventing unauthorised or accidental access, processing, erasure or other use of the personal data, we

have implemented various internal policies (including physical, electronic and management measures) to safeguard and secure the personal data we collect.

- Openness and Data Access: Upon request, we will inform you about how your personal data is processed and the rights and remedies you have under these principles. You may, by sending an email to info@pioneer-am.com, enquire as to the nature of the personal data stored or processed about you by us, including:
 - asking us to correct your personal data which is held by us;
 - requesting deletion or erasure of your personal data;
 - objecting to the sharing of your personal data (in certain circumstances); OR
 - objecting to the profiling of your personal data.

Certain personal data (e.g., relating to your personal information and contact information) are required for your continued use of the Website. By providing your personal data to us, you acknowledged that such provision is fair and reasonable in the circumstances.

The principles set out in this policy show our commitment to you in respect of your personal data. The policy and principles we uphold thereunder may be amended and/ or updated from time to time. You are advised to check this policy periodically, to see and be informed of our current principles for the protection of your personal data.

If you have questions or comments in relation to the principles or your personal data, please contact us at:

Address: 18/F, On Hing Building, No.1 On Hing Terrace, Central, Hong Kong.

Email: info@pioneer-am.com