

# Privacy Policy Statement

## 1. OUR CORPORATE POLICY

1.1 It is the corporate policy of Advanced Merchant Payments Ltd. and its subsidiaries and affiliates (collectively, “AMP”) to respect and safeguard the privacy of an individual’s personal data (“**data**”). This Privacy Policy Statement (“**Statement**”) stipulates clearly (1) types of data collected by AMP; (2) AMP’s purposes of data collection; (3) controls employed by AMP for protection of data; (3) the classes of persons AMP can transfer data to; and (4) the data access and correction rights of customers, (each a “**Data Subject**”).

1.2 From time to time, it is necessary for a Data Subject to supply AMP with data in connection with the establishment or continuation of credit facilities or provision of business advisory, lending and other financial services. Failure to supply such data may result in AMP being unable to provide the foregoing services to the Data Subject.

## 2. TYPES OF DATA/ INFORMATION COLLECTED AND HELD

2.1 For the purpose of conducting AMP’s business, AMP may collect from a Data Subject and hold some or all of the data and other information such as, but not limited to, the following:

2.1.1 Contact name;

2.1.2 Business name

2.1.3 Telephone number;

2.1.4 Email;

2.1.5 Business address;

2.1.6 Requested loan amount;

2.1.7 Credit card depositing bank;

2.1.8 Financial information regarding the Data Subject’s personal or business accounts; and

2.1.9 Information from any social media websites in the public domain posted by the Data Subject.

2.2 AMP’s web servers may also collect information relating to a Data Subject’s online session including his/her IP address and/or domain name, the use of which is to provide aggregated, anonymous, statistical information on the server’s usage so that AMP may better meet the demands and expectations of browsers to its website.

### 3. **COOKIES**

- 3.1 AMP may, from time to time, use cookies to identify a computer which may include an anonymous unique identifier. Cookies are small bits of information that are automatically stored on a person's web server in his/her computer that can be retrieved by this site.
- 3.2 The information collected by cookies is anonymous aggregated research data, and contains no name or address information or any information that will enable anyone to contact a Data Subject via telephone, email or any other means.
- 3.3 Most browsers are initially set to accept cookies. However, by disabling them, a Data Subject may not be able to take full advantage of AMP's website, including online services.

### 4. **PURPOSES OF USE OF DATA**

- 4.1 The purposes for which data relating to a Data Subject may be used by AMP are as follows:
  - 4.1.1 processing an application for AMP's services;
  - 4.1.2 the daily operation of the services and credit / financial facilities provided to the Data Subject;
  - 4.1.3 conducting credit checks and carrying out matching procedures;
  - 4.1.4 assisting other financial institutions to conduct credit checks and collect debts;
  - 4.1.5 ensuring ongoing credit worthiness of a Data Subject;
  - 4.1.6 designing credit / financial services or related products for a Data Subject's use;
  - 4.1.7 marketing the following services or products (in respect of which AMP may or may not be remunerated) financial, insurance, credit card, banking and related services and products which may be provided and/or marketed by AMP or third party financial institutions, insurers, credit card companies, securities and investment services providers;
  - 4.1.8 determining the amount of indebtedness owed to or by a Data Subject;
  - 4.1.9 enforcement of a Data Subject's obligations, including without limitation the collection of amounts outstanding from a Data Subject;
  - 4.1.10 meeting the requirements to make disclosure under the requirements of any law binding on AMP or under and for the purposes of any guidelines issued by regulatory or other authorities with which AMP is expected to comply;

- 4.1.11 comparing data of the Data Subject or other persons for credit checking, data verification or otherwise producing or verifying data, whether or not for the purpose of taking adverse action against the Data Subject;
- 4.1.12 maintaining a credit history of the Data Subject (whether or not there exists any relationship between the Data Subject and AMP) for present and future reference; and
- 4.1.13 prevention or detection of crime.

## 5. **TRANSFER OF DATA**

- 5.1 Data held by AMP relating to a Data Subject will be kept confidential but it may provide such information to the following parties (whether within or outside the Data Subject's country) for the purposes set out in paragraph 4.1:
  - 5.1.1 agents, contractors or third party service providers who provide administrative, accounting, legal advisory, telecommunications, computer, payment, data processing, credit reference, debt collection or securities clearing or other services to AMP in connection with the operation of its business;
  - 5.1.2 AMP's associated companies or affiliates which are under a duty of confidentiality to AMP and have undertaken to keep the data confidential;
  - 5.1.3 any law enforcement agencies, regulatory bodies and/or authorities to whom AMP is under an obligation to make disclosure under the requirements of any law or guidelines binding on AMP;
  - 5.1.4 any actual or proposed assignee of AMP or transferee of the rights of AMP in respect of the Data Subject or all or any part of the assets or business of AMP; and
  - 5.1.5 any third party giving or proposing to give a guarantee or security to guarantee or secure the Data Subject's obligations to AMP.

## 6. **SECURITY OF DATA**

- 6.1 AMP strives to ensure that data will be protected against unauthorized or accidental access, processing or erasure. In doing so, AMP has implemented appropriate physical, electronic and managerial measures and controls to safeguard and secure the data.
- 6.2 AMP's web servers are protected by appropriate firewalls which will be kept up-to-date. However, as the security of ordinary email cannot be guaranteed, a Data Subject should not send us any email containing any data.
- 6.3 AMP will not keep data longer than is necessary for the fulfillment of the purposes (including any directly related purpose) for which they are, or are to be, used. AMP will purge unnecessary data from its system in accordance with its internal procedures.

## 7. **ACCESS AND CORRECTION OF DATA**

### 7.1 Any Data Subject has the right:

- 7.1.1 to check whether AMP holds data about him / her and access to such data;
  - 7.1.2 to require AMP to correct any data relating to him/ her which is inaccurate;
  - 7.1.3 to ascertain policies and practices in relation to data and to be informed of the kinds of data held by AMP;
  - 7.1.4 in relation to consumer credit, to request to be informed which items of data are routinely disclosed to credit reference agencies or debt collection agencies, and be provided with further information to enable the making of an access and correction request to the relevant credit reference agency or debt collection agency, as the case may be; and
  - 7.1.5 In relation to data which has been provided by AMP to a credit reference agency, to instruct AMP upon termination of an account by full repayment to make a request to the credit reference agency to delete such data from its database, as long as the instruction is given within five years of termination and at no time did the account have a default of payment lasting in excess of 60 days within 5 years immediately before account termination. In the event the account has had a default of payment lasting in excess of 60 days, the data may be retained by the credit reference agency until the expiry of five years from the date of final settlement of the amount in default or five years from the date of discharge from a bankruptcy as notified to AMP, whichever is earlier.
- 7.2 AMP has the right to charge a reasonable fee for the processing of any data access request.
- 7.3 Requests for access to data or correction of data or for information regarding policies and practices and kinds of data held are to be addressed as follows:

Attention: Data Protection Officer

Address: Suite 2105A, 21/F Harcourt House, 39 Gloucester Road, Wanchai, Hong Kong

Tel: +852 2541 3180

Fax: +852 3017 6822

## 8. **DIRECT MARKETING**

- 8.1 A Data Subject may, at any time and without charge, request AMP to cease using his/her data for direct marketing purposes and sending him/her promotional materials by writing to AMP's Data Protection Officer at the contacts above.

9. **MISCELLANEOUS**

- 9.1 Nothing in this Statement shall limit the rights of Data Subjects under any laws or regulations relating to the protection of data.
- 9.2 AMP's website may, from time to time, contain links to other websites. This Statement only applies to this website so when you link to other websites, you should read their own privacy policies.

November 2011