



Personal Data Protection Policy and Practices (“the Policy”)

FWD Pension Trust Limited ("the Company") is committed to the implementation and compliance with the provisions of the Personal Data (Privacy) Ordinance ("the Ordinance"). In this context the Corporate Data Protection Officer is responsible for coordinating and overseeing compliance with the Ordinance and the upholding of the Data Protection Principles set out in the Ordinance.

This Policy applies to all products and services provided by the Company and sets out how the Company may collect, use and disclose your personal information.

Personal Information Collection Statement

1. From time to time, it is necessary for you to supply the Company with personal information and particulars in connection with the provision, continuation and administration of MPF related services and products by the Company. Failure to provide the necessary information and particulars may result in the Company being unable to provide or continue to provide these services and products to you.
2. The Company may also generate and compile information about you. Personal information and particulars provided by you and all information generated and compiled by the Company about you from time to time is collectively referred to as "Your Personal Data".
3. Your Personal Data may be used by the Company and/or FWD Life Insurance Company (Bermuda) Limited (the “Sponsor”) for one or more of the following purposes:
 - (i) processing, administrating, implementing and effecting your application and the provision of MPF services (including but not limited to customer survey and account consolidation services);
 - (ii) meeting disclosure requirements imposed by law or regulatory authorities (including the Mandatory Provident Fund Schemes Authority and the Securities and Futures Commission);
 - (iii) meeting disclosure requirements as pursuant to any order of a court of competent jurisdiction; and/or
 - (iv) fulfilling any other purposes incidental to or associated with (i) to (iii) above .
4. To facilitate the purposes set out in paragraph 3 above, the Company may transfer, disclose, grant access to or share Your Personal Data with the following parties (whether within or outside Hong Kong) and Your Personal Data may be transferred outside Hong Kong:
 - (i) any person or company which is acting for or on behalf of the Company or the Sponsor, or jointly with the Company and/or the Sponsor, in respect of a purpose or a directly related purpose for which your Personal Data was provided, such person or company include but not limited to administrative service providers and professional advisors; and

- (ii) any person or company to whom the Company and/or the Sponsor is under an obligation or otherwise required or expected to make disclosure under the requirements of any law, rules, regulations, codes of practice or guidelines (whether applicable in or outside Hong Kong) including, without limitation, any legal, regulatory, governmental, tax, law enforcement or other authorities, self-regulatory or industry bodies.
- 5. The Company and/or the Sponsor are allowed to use Your Personal Data in direct marketing only if you consent or do not object.
- 6. In connection with direct marketing, the Company and/or the Sponsor intend:
 - (i) to use your name, contact details, services and products portfolio information, financial background and demographic data held by the Company and/or the Sponsor from time to time in direct marketing activities of MPF products and/or MPF services; and/or;
 - (ii) to market the MPF product/ service information offered by the Company or the Sponsor from time to time.
- 7. **If you do NOT wish the Company or the Sponsor to use Your Personal Data in direct marketing, you may write to the Administrator of the Company (BestServe Financial Limited, at 10/F., One Harbourfront, 18 Tak Fung Street, Hunghom, Kowloon, Hong Kong) to opt out from direct marketing at any time.**
- 8. Under the Ordinance:
 - (i) you have the right to request access to Your Personal Data held by the Company and request correction of any of Your Personal Data which is incorrect; and
 - (ii) the Company has the right to charge you a reasonable fee for processing and complying with your data access request.

Accuracy of Personal Information

The Company will ensure the accuracy of all personal data collected and processed by the Company. Appropriate procedures are implemented so that all personal data is regularly checked and updated to ensure that it is reasonably accurate having regard to the purposes for which that data is used. In so far as personal data held by the Company consists of statements of opinion, all reasonably practicable steps are taken to ensure that any facts cited in support of such statements of opinion are correct.

The Company will at all times endeavour to ensure the accuracy of personal data held by the Company, and if such personal data is transferred to third parties, it will notify that third party of any correction to be made.

Retention of Personal Information

No personal data is kept for longer than is necessary and that the Company will comply with all statutory and regulatory requirements in the Hong Kong Special Administrative Region concerning the retention of personally identifiable information.

Data Security



The Company will ensure an appropriate level of protection for personal data in order to prevent unauthorized access, processing or other use of that data, commensurate with the sensitivity of the data and the harm that would be caused by unauthorized access to that data. It is the practice of the Company to achieve appropriate levels of security by restricting physical access to data, providing secure storage facilities and incorporating security measures into equipment in which data is held. Measures are taken to ensure the integrity, prudence, and competence of persons having access to personal data and personal data is only transmitted by secure means.

Data Access Request

The Company has the right to charge a reasonable fee in respect of a data access and/or correction request. If a person making a data access and/or correction request requires an additional copy of the personal data, the Company may charge a fee to cover the full administrative and other costs incurred in supplying that additional copy.

Use of Cookies and Third Party Links

The Company's website may include hyperlinks to third party websites. The Company has no control over the content, accuracy, opinion expressed, and other links provided at these third party websites or how these third party websites deal with your personal data. You should visit these third party websites for details of their privacy policies in relation to their handling of your personal data.

The Company may use "cookies" to improve our internet service to you. Cookies are small data files that are automatically stored on your web browser in your computer that can be retrieved by the Company's website. Cookies enable the Company's website to remember you and your preferences when you visit the website and enable us to tailor the website to your needs. The information collected by cookies is anonymous visitor's personalised settings information and contains no name or address information or any information that will enable anyone to contact you via telephone, e-mail or any other means. No customer personal data is stored in cookies. However, you can disable cookies by changing the settings of your web browser.

In case of discrepancies between the English and Chinese versions, the English version shall apply and prevail.

Further enquiries regarding the Company's Personal Data Protection Policy and Practices may be directed to:

The Corporate Data Protection Officer
1st Floor, FWD Financial Centre,
308 Des Voeux Road Central, Hong Kong
Telephone : (852) 3123 3123