

Privacy Policy and Personal Information Collection Statement ("Statement")

Last Updated: March 7(th), 2025

Effective Date: March 7(th), 2025

Privacy Policy

1. In this Statement, the following terms shall have their respective meanings:

(a) "BCAN":

(i) means, in the context of Futu Securities' provision of the Stock Connect Northbound trading services, Broker-to-Client Assigned Number;

(ii) in the context of the SFC's Hong Kong investor identification regime and over-the-counter securities transactions reporting regime (when it comes into effect), has the meaning given to it in paragraph 5.6(b)(ii) of the Code of Conduct for Persons Licensed by or Registered with the Securities and Futures Commission (when it comes into effect);

(b) "CCASS Rules" means the General Rules of CCASS, as in force from time to time;

(c) "CID":

(i) means, in the context of Futu Securities' provision of the Stock Connect Northbound trading services, such identification information relating to you as SEHK may request from time to time under the Rules of the Exchange of SEHK;

(ii) in the context of the SFC's Hong Kong investor identification regime and over-the-counter securities transactions reporting regime (when it comes into effect), has the meaning given to it in paragraph 5.6(b)(iv) of the Code of Conduct for Persons Licensed by or Registered with the Securities and Futures Commission (when it comes into effect);

(d) "data subject", in relation to personal data, means the individual who is the subject of the data;

(e) "Futu Group" means Futu Securities and its subsidiaries, holding companies, subsidiaries of those holding companies and other associated or related entities;

(f) "Futu Securities", or "we" or "us" means Futu Securities International (Hong Kong) Ltd;

(g) "GDCA" means Global Digital Cybersecurity Authority CO., Ltd (数安时代科技股份有限公司);

(h) "HKEX" means Hong Kong Exchanges and Clearing Limited;

(i) "Hong Kong" means the Hong Kong Special Administrative Region of the People's Republic of China;



(j) "China mainland" means the People's Republic of China, excluding Hong Kong, Macau, and Taiwan;

(k) "PDPO" means the Personal Data (Privacy) Ordinance (Cap. 486, Laws of Hong Kong);

(l) "personal data" means any data:

(a) relating directly or indirectly to a living individual;

(b) from which it is practicable for the identity of the individual to be directly or indirectly ascertained; and

(c) in a form in which access to or processing of the data is practicable;

(m) "non-personal data" means any data not falling within the meaning of "personal data";

(n) "SEHK" means the Stock Exchange of Hong Kong; and

(o) "SFC" means the Securities and Futures Commission of Hong Kong.

2. Futu Securities is committed to providing its clients with excellent securities services. Based on your service needs, we will collect and use different types of your personal data and non-personal data. We treat the use and confidentiality of our clients' personal data and non-personal data seriously.

3. The security and privacy of our clients' personal data and non-personal data is a matter of utmost importance for Futu Securities. We are committed to protecting the privacy, confidentiality, and security of our clients' personal data and non-personal data; in the case of personal data by complying with the requirements of the PDPO through the implementation of the policies set out in this Statement.

4. Where our operations are also subject to privacy legislation other than that of Hong Kong, such as the privacy laws of China mainland, we will seek to comply with all such applicable laws and regulations to the extent that it is possible for us to do so. Where there is a conflict between different systems of laws, we will, in most cases, comply with the system of law that imposes a stricter standard on us.

5. Please note that this Statement may be amended from time to time, with prior notice to you. Nevertheless, you are advised to check the latest version of this Statement on our websites on a regular basis.

Collection and Use of Data

6. Futu Securities may collect personal data provided voluntarily by visitors to this website/application.

7. Individual clients (which includes you) may be required to provide us with the following data:

(a) their personal data, including name, age, occupation, marital status, email address, telephone number, personal identity information, biometric data, photograph and video, electronic signature, address and other contact information, location data, financial information, credit history, source of wealth, risk tolerance, investment experiences and objectives;

(b) transaction records;

(c) account balance and securities portfolio;

(d) IP address, browser type and version, time zone settings, browser plugin types, operating systems or platform and device data (including where the IMEI number of mobile device, wireless networks and general network data);

8. Futu Securities may also obtain your personal data from publicly available sources of information, recording telephone conversations and/or communications by using electronic media, or from third party risk intelligence applications.

9. Your personal data and non-personal data will be recorded when you visit this website/application, used for the purposes of data analysis, including analyzing the number of visitors to the website/application. For further information on how we make use of cookies, please refer to our Cookie Policy.

10. We will only use the personal data we collect for the purposes set out in this Statement. If you do not supply the personal data requested, we may not be able to provide or continue to provide our services to you, including without limitation, providing you with trading services in respect of certain markets and/or products. Your personal data (whether individually, or aggregated with the personal data of other people) may be used for the following purposes:

(a) Providing you with our products or services (including the provision of financial advice);

(b) Verifying your identity as part of the initial and on-going Know-Your-Client (KYC) due diligence process and otherwise for the purposes of complying with anti-money laundering laws and regulations which we are subject to;

(c) Conducting matching procedures (as defined in s.2 of the PDPO, which broadly includes comparison of two or more sets of your personal data, for the purpose of taking actions adverse to your interests, such as declining an application);

(d) Conducting or arranging for you certification services recognized by the Electronic Transactions Ordinance (Cap 553) such as services provided by certification authorities in Hong Kong or other places (including but not limited to China mainland) for client identity verification purposes, and specifically, if you are domiciled in China mainland, for the purpose of applying for a certificate with the GDCA or such other certification authority as we consider appropriate;

(e) Dealing with service applications submitted by you, your guarantors or your security providers;

(f) Performing credit checks, verification procedures, data verification, due diligence and risk management processes;

(g) Assisting other financial institutions to conduct credit checks and collect debts;

(h) Assessing your and your guarantors' and security providers' credit worthiness;

(i) Designing financial and other related services and products for your use;

(j) Promoting and marketing certain services and products to you (please refer to the section entitled "Use of Data in Promotion and Direct Marketing" below for further details);

(k) Determining the amount of debt owed to us by you, your guarantors and/or your security providers ;

(l) Collecting debts from you, your guarantors and your security providers;

(m) Complying with any applicable laws, rules, regulations, court orders or the requests or requirements of any regulatory body;

(n) Enabling any of our actual or proposed transferees / assignees to assess any proposed merger, re-organization or other similar process;

(o) Any purposes allowed by applicable laws;

(p) Defending our rights or participating in any legal or administrative proceedings;

(q) Observing the requirements of the "Codes on Takeovers and Mergers and Share Buy-backs" (as amended from time to time) which are issued by the SFC and/or the laws and/or regulatory rules in Hong Kong and/or other places;

(r) Conducting marketing research, surveys and other similar activities;

(s) Generating unique internal identification numbers for organizational and reporting purposes and other forms of statistical analysis;

(t) When the SFC's Hong Kong investor identification regime or over-the-counter securities transactions reporting regime comes into effect (as the case may be), allowing SEHK to:

- collect, store, process and use your personal data (including CID and BCAN(s)) for market surveillance and monitoring purposes and enforcement of the Rules of the Exchange of SEHK;

- disclose and transfer such information to the relevant regulators and law enforcement agencies in Hong Kong (including, but not limited to, the SFC) so as to facilitate the performance of their statutory functions with respect to the Hong Kong financial markets; and

- use such information for conducting analysis for the purposes of market oversight;

(u) When the SFC's Hong Kong investor identification regime or over-the-counter securities transactions reporting regime comes into effect (as the case may be), allowing the SFC to:

- collect, store, process and use your personal data (including CID and BCAN(s)) for the performance of its statutory functions including monitoring, surveillance and enforcement functions with respect to the Hong Kong financial markets; and

- disclose and transfer such information to relevant regulators and law enforcement agencies in Hong Kong in accordance with applicable laws or regulatory requirement;

(v) allowing each of SEHK and the relevant SEHK Subsidiaries (as defined in the Rules of the Exchange) to:

- collect, use and store your BCAN, CID and any consolidated, validated and mapped BCANs and CID information provided by the relevant China Connect Clearing House (as defined in the CCASS Rules) (in the case of storage, by any of them or via HKEX) for market surveillance and monitoring purposes and enforcement of the Rules of the Exchange;
- transfer such information to the relevant China Connect Market Operator (as defined in the Rules of the Exchange) (directly or through the relevant China Connect Clearing House) from time to time for the purposes set out in paragraphs 10(w) and (x) below; and
- disclose such information to the relevant regulators and law enforcement agencies in Hong Kong so as to facilitate the performance of their statutory functions with respect to the Hong Kong financial markets;

(w) allowing the relevant China Connect Clearing House (as defined in the CCASS Rules) to:

- collect, use and store your BCAN and CID to facilitate the consolidation and validation of BCANs and CID and the mapping of BCANs and CID with its investor identification database, and provide such consolidated, validated and mapped BCANs and CID information to the relevant China Connect Market Operator, SEHK and the relevant SEHK Subsidiary;
- use your BCAN and CID for the performance of its regulatory functions of securities account management; and
- disclose such information to the China mainland regulatory authorities and law enforcement agencies having jurisdiction over it so as to facilitate the performance of their regulatory, surveillance and enforcement functions with respect to the China mainland financial markets;

(x) allowing the relevant China Connect Market Operator to:

- collect, use and store your BCAN and CID to facilitate their surveillance and monitoring of securities trading on the relevant China Connect Market (as defined in the Rules of the Exchange) through the use of the China Connect Service (as defined in the Rules of the Exchange) and enforcement of the rules of the relevant China Connect Market Operator; and
- disclose such information to the China mainland regulatory authorities and law enforcement agencies so as to facilitate the performance of their regulatory, surveillance and enforcement functions with respect to the China mainland financial markets;

(y) Generating anonymised statistics, information and reports in relation to, or for the purpose of, the design of our financial products and services and/or the marketing or provision of our services; and

(z) Any functions related to the foregoing.

Disclosure of Personal Data

11. Personal data held by Futu Securities will be kept confidential, but may be disclosed to the following persons

for one or more of the purposes set out in paragraph 10:

(a) Any of our officers, employees, agents, contractors or third party service providers who provide administrative, credit data, debt collection, telecommunications, client verification, due diligence, computing, payment, promotional, marketing or other services related to our business operations to us (e.g. IT vendors, electronic storage vendors, biometric authentication service providers);

(b) Any member of the Futu Group;

(c) Any of your guarantors and security providers or prospective guarantors and security providers;

(d) Any financial institution trading with or intending to trade with you, or any of your counterparties in a trade;

(e) Credit data service institutions or debt collecting institutions (where you owe us money or where there has been an event of default (howsoever described));

(f) Any actual or proposed assignee or transferee of Futu Securities, or participant or sub-participant or transferee of Futu Securities in respect of our rights against you;

(g) Any person or entity or data recipient who has already established or intends to establish any business relationship with Futu Securities;

(h) Any certification authority whether in Hong Kong or other places (including but not limited to China mainland);

(i) Any agencies in Hong Kong or other places for compliance with applicable laws, regulations, rules or guidelines regarding the automatic exchange of financial account information or the Foreign Account Tax Compliance Act promulgated by the United States; and

(j) Any local or foreign legal agency, regulatory body, government, tax authority, law enforcement agency, administrative or statutory agency, stock exchange or clearing house, or other self-regulatory agency or industry organization or group in Hong Kong or other places (including but not limited to China mainland), and this includes the SEHK, the relevant SEHK Subsidiaries and the SFC.

12. Futu Securities may transfer your personal data to a place outside Hong Kong in accordance with this Statement. Your personal data may not be afforded the same or similar level of protection as it is under the PDPO.

Use of Data in Promotion or Direct Marketing

13. Futu Securities may use your personal data to send you information about products, services and other marketing materials that we think you might be interested in.

14. You can choose to receive direct marketing materials by email, direct mail and/or other means. If you do not wish to receive such direct marketing materials, you may elect to opt-out at any time by contacting our Futu Data and Personal Data Protection Centre. Futu Securities intends to use your personal data for direct marketing purposes, for which we have to obtain your consent (which includes an indication of no objection). In this regard, pl

ease note that:

In this regard, please note that:

(a) Your name, contact details, product and service, investment portfolio information, trading patterns and conduct, financial background and statistics held by Futu Securities from time to time may be used for direct marketing;

(b) The following categories of services, products and subjects may be marketed to you:

(i) Finance, insurance, securities, commodities, investment and related services and products and facilities;

(ii) reward, loyalty, co-branding or privileges programmes and related products and services;

(iii) financial or banking products and services offered by our business partners (the names of such partners will be provided to you); and

(iv) donations and contributions for charitable and/or non-profit making purposes;

(c) The above services, products and subjects may be marketed by Futu Securities and/or the following persons:

(i) Any member of the Futu Group;

(ii) Third-party financial institutions, underwriters, securities, commodities and investment service providers;

(iii) Providers of third-party reward, loyalty, co-branding or privileges programme (the names of such co-branding partners will be provided to you);

(iv) Our business partners;

(v) Charitable and/or non-profit organizations;

(d) In addition to promoting the above services, products and subjects, Futu Securities may provide the personal data mentioned in paragraph 14(a) to any of the persons as mentioned in paragraph 14(c) above for the purpose of promoting their services, products and subjects. In order for us to do so, we need to obtain your written consent (which includes an indication of no objection) for this purpose;

(e) If you do not wish Futu Securities to use or provide your personal data to other persons for the direct marketing purposes set out in paragraph 14(d), please notify our Futu Data and Personal Data Protection Centre; and

(f) We may receive money or other property in return for providing your personal data to the other persons in paragraph 14(d) and, when requesting your consent or no objection we will inform you if we will receive any money or other property in return for providing the personal data to the other persons.

Providing Another Person's Personal Data

15. Where you provide to us personal data about another person, you must give to that person a copy of this Statement and, in particular, tell him/her that you have provided us with their personal data and how we may use his/her personal data.

Personal Data Protection Measures

16. Futu Securities implements protective measures to safeguard and secure personal data to ensure it is protected against unauthorised or accidental access, processing, or erasure. These measures include the following:

Access or use of such data is limited to authorized staff or agents on a "need to know" basis and such data is accessed utilizing secured methods (e.g. personal data is encrypted when necessary);

We do not distribute your personal data to other persons except to the classes of transferees set out in this Statement and for the purposes set out in this Statement;

The use and transfer of your personal data between members of the Futu Group is subject to strict internal security standards, confidentiality policies, privacy laws and other applicable laws;

We ensure that our employees fully comply with such standards, policies and laws;

We provide training to our staff on the proper handling of your personal data; and

We will not share or sell the U.S. person's mobile information (including the name and phone numbers) to any external parties not under Futu Group regarding the external parties' marketing and/or promotional purposes.

17. As we further develop new products and services, we will continue to make every effort to ensure that your personal data is properly used and protected.

Data Access and Correction Requests

18. According to and in accordance with the terms of the PDPO, you have the right to:

obtain information regarding the processing of your personal data and access the personal data which we hold about you;

request that we rectify your personal data if it is inaccurate or incomplete; and

lodge a complaint with the Privacy Commissioner for Personal Data if you think that any of your data privacy rights have been infringed by us;

19. You may ask that we erase some or all of your personal data, but please note that we are under no legal obligation to do so, and it may not be legally or operationally possible for us to do so.

20. If there is a change to any of the personal data that you have provided to us, please contact our Futu Data and Personal Data Protection Centre.

21. You should send requests for access to, and correction of, your personal data to us at:

Attention: Futu Data and Personal Data Protection Centre

Futu Securities International (Hong Kong) Ltd

Address: 34/F, United Centre, 95 Queensway, Admiralty, HK.

Email: cs@futu.hk

*Please indicate your name, Futubull account No. and contact number for us to follow up with your request. You may be asked to provide additional information to authenticate your identity in order for us to follow up your request.

22. In accordance with the terms of the PDPO, Futu Securities reserves the right to charge a reasonable fee for processing any data request.

23. Nothing in this statement shall limit your rights under the PDPO.

Retention Period of Personal Data

24. We will not keep personal data longer than is necessary for the fulfillment of the purpose for which it was collected. The retention period of personal data collected depends on different factors, including:

Usage: we may have to continue to retain the personal data for the purpose(s) for which it was collected for; and

Legal obligations: there may be minimum retention periods for that personal data, as stipulated in applicable laws and regulations.

Note In case of any discrepancy between the English and Chinese versions of this Privacy Policy Statement, the English version prevails.

Appendix: Supplemental Personal Data Protection Policy for Clients of China Mainland

1 Purposes and Applicability of the Appendix

This Appendix (China) is applicable to clients of China mainland (which, for the purposes of this Appendix, excludes the Hong Kong Special Administrative Region, Macao Special Administrative Region and Taiwan). If you are a client of China mainland, you are aware of, and pay due attention to, the fact that, during the account opening process and subsequent securities transactions carried out via the Futubull app, the personal information you provide is directly collected and processed by Futu Securities.

This Appendix conforms to the "Personal Information Protection Law of the People's Republic of China" and relevant laws and regulations (hereinafter referred to as "China mainland laws"), and serves as supplementary information to the "Privacy Policy and Personal Information Collection Statement" (the "Statement") between clients of China mainland and Futu Securities. Where applicable, in the event of any discrepancies between the terms of this Appendix and the provisions contained in the Statement, the former shall prevail. Provisions of the Statement shall be applicable to unaccomplished matters under this Appendix.

For the sake of clarity, "personal information" mentioned in this Appendix, similar to "personal data" mentioned in the Statement, refers to information related to an identified or identifiable natural person recorded electronically or otherwise, excluding anonymized information; "sensitive personal information" refers to personal information that, once leaked or used illegally, is likely to cause damage to the personal dignity of natural persons or endanger personal and property safety, including biometrics, religious beliefs, specific identities, medical health, financial accounts, whereabouts, and personal information of minors under the age of 14, etc. The abbreviations of proper nouns not defined in this Appendix have the same meanings as those given in the Statement.

If you need to provide any other personal information when using our services, a separate agreement, business rules, etc. (hereinafter collectively referred to as the "separate agreement") may exist for such services, and you need to read and agree to such separate agreement.

2 How Do We Publicly Disclose, Transfer, Process and Share Your Personal Information?

2.1 Public disclosure

We will publicly disclose your personal information, only in the following circumstances:

(1) We may publicly disclose your personal information with your express consent or according to your voluntary choice;

(2) We may supply or publicly disclose your personal information pursuant to the laws, legal or administrative proceedings, or in compliance with litigation or mandatory requirements of competent government authorities.

We will publicly disclose your personal information in accordance with the types of personal information and disclosure methods specified in such request for public disclosure. Upon receipt of such request for information disclosure, we will require the individual or organization making the request to produce relevant legal documents, e.g. subpoena or letter of inquiry. As regards the information we are requested to provide, we firmly believe in being as transparent as possible to the extent permitted by law. All requests for public disclosure of personal information will be duly reviewed to ensure that such requests are made on a lawful basis, and only target data that law enforcement authorities have the legal authority to retrieve for specific investigation purposes. To the extent permitted by applicable laws and regulations, we will adopt encryption measures for the aforementioned information publicly disclosed.

2.2 Transfer

We do not transfer your personal information to any company, organization or individual, unless:

(1) An express consent on information transfer has been obtained - we may transfer your personal information to a third party after obtaining an express permission from you;

(2) A merger or acquisition or liquidation proceedings entail the transfer of personal information, in which case we will inform you of the name and contact information of the recipient of the information transferred. We will require that the Statement and this Privacy Policy continue to be binding on the company or organization, to which your personal information is transferred, otherwise we will require the company or organization to seek your authorization and permission again.

2.3 Data processing by commission

Where we commission another company, organization or individual to process your personal information, we will enter into a strict confidentiality agreement or data protection agreement with the commissioned entity, requiring that it handles the personal information in compliance with our requirements, laws and regulations and other relevant confidentiality and security measures aimed at ensuring personal information confidentiality and security.

We may commission the following entities (including individuals, companies, organizations, etc.) to process clients' personal information (and other data):

(1) Any staff, employees, agents, contractors or third parties (e.g. our IT service providers, electronic data storage service providers and biometric authentication service providers) who provide Futu Securities with administrative, credit information, debt collection, telecommunications, computer, payment, etc. services for its business operations;

(2) Third-party agencies and persons that set up, maintain and test procedures and systems for client data verification and due diligence, and are subject to strict authority control with respect to such procedures and systems.

2.4 Sharing

We will not share your personal information with third parties external to Futu Securities, unless:

(1) A specific individual cannot be identified for the information processed, and such information cannot be reversed;

(2) Your prior separate consent has been obtained;

(3) As regards information shared between any companies within the Futu Group, including but not limited to holding companies or affiliates located in Hong Kong or elsewhere, and affiliates to the Futu Group, we only share personal information on a need-to-know basis, and information sharing will be limited to the purposes specified in the Statement. In the event that our affiliates want to change the objectives or purposes of information processing set out in this Privacy Policy, we will seek your authorization and consent again;

(4) The provision of information to third parties is justified under other circumstances according to the laws and regulations.

3 Cross-border Transfer of Personal Information

Your personal information will be stored in a server in Hong Kong, subject to strict protection under the Statement and this Appendix. However, Futu Securities may share/transfer personal information about related clients

to locations outside Hong Kong according to the purposes specified in the Statement and this Appendix, as required to perform the contract executed with you and the obligations under the laws and regulations. We will make sure that overseas recipient, when storing and transmitting your personal information, will protect such information in accordance with the requirements of the relevant laws and regulations of the People's Republic of China, to an extent equivalent or comparable to that of protection afforded in the Statement and this Appendix.

The overseas recipient of personal information is [Futu Securities International (Hong Kong) Ltd.]
Correspondence address: [34/F, United Centre, 95 Queensway, Admiralty, HK]
Telephone: [400-870-1818]

4 How Do We Protect Your Personal Information?

As we stated in the Statement, we promise that Futu Securities adopts industry-standard physical, technical and organizational security measures to protect clients' personal information from accidental or illegal destruction, loss, use, modification, misuse or unauthorized access, modification or destruction. For example, we will take various security measures when storing and transmitting the personal information as prescribed in this Appendix, e.g. encryption and de-identification. Unfortunately, the internet does not provide a 100% secure environment, so we cannot absolutely guarantee that your information will be completely secure during transmission or storage, and nor can we guarantee that the physical, technical or organizational measures we take will never be compromised.

In the event of a security incident, we will comply with our notification obligations and promptly inform you of the following information: Basic information about the security incident and its potential impact (including the type of personal information leaked, lost or tampered with, the cause of the incident, and potential consequences), the remedial actions we adopt, and suggestions on how to protect yourself and reduce risks. We will make our best endeavors to notify you in time by email, push notification, short message service (SMS), etc. Where it is impossible to notify every subject of personal information one-by-one, we will announce the information using a reasonable and effective method. Furthermore, we will also proactively report to authorities at higher levels on the handling of the personal information security incident, in accordance with the requirements of the regulatory bodies.

While ensuring compliance of our business operations with the requirements of relevant laws and regulations and those set by regulatory authorities, we will ensure that you will be able to exercise the following rights over your personal information as follows:

4.1 Information Review/Access, Correction, Revision and Supplement

You have the right to access, correct, revise, or make supplementary additions to, your personal information held by us, unless otherwise prescribed in the laws and regulations of China mainland;

If you cannot access, correct, revise, or make supplementary additions to, your personal information through the channels specified above, you can contact us at any time using the contact information set out in this Privacy Policy, and we will respond to your request within 15 working days;

In the event of any change in the personal information you provided to us, please correct it in a timely manner using the method described above. We will not be held liable for any violation of privacy caused by your failure to notify us of such changes.

4.2 Withdrawal of Consent

We will process your personal information (e.g. dissemination of marketing information) based on your consent, and you have the right to withdraw your consent allowing us to process your personal information at any time. Please be aware and understand that, when opening a securities account or carrying out transactions, you are required to provide relevant personal information in accordance with the requirements of relevant applicable laws and regulations, and we still have the right to process related personal information.

4.3 Deletion of Personal Information and Securities Account Cancellation

You have the right to require that we delete your personal information, if:

(1) We process personal information in violation of the laws, administrative regulations in China Mainland or agreements entered into with you;

(2) The purpose for which the information is processed has been achieved or cannot be achieved, or the personal information is no longer required for such purpose;

(3) We no longer provide you with any products or services, or the retention period thereof has expired;

(4) Where personal information is processed with your consent, you withdraw your consent;

(5) Other circumstances stipulated by laws and regulations arise.

You can apply for securities account cancellation application via Futubull [Account and Security -> Cancellation of Securities Account]. Please be aware that we are required under laws and regulations to collect your personal data during account opening for providing you with securities brokerage service, you can only request to delete personal information provided by you during account opening when you cancel your securities account.

You can also contact us using the contact information set out in this Privacy Policy, and we will assist you with the cancellation of your securities account after verifying your identity. After canceling the securities account, we will stop providing you with products or services, and delete or anonymize your personal information according to your requirements and the provisions of this Privacy Policy. However, if the retention period prescribed by laws and administrative regulations has not expired, or it is technically difficult to delete your personal information, we will suspend the deletion of your personal information and stop further handling your personal information other than data storage and adoption of necessary safety precautions.

4.4 Right to Interpretation

You have the right to request an explanation of our rules on the processing of personal information. You may get in touch with us using the contact information set out in this Appendix.

4.5 How We Respond to Your Request

If you have any questions or concerns as to how we exercise the rights owned by you with respect to personal information, please do not hesitate to contact us using the contact details shown at the bottom of this Appendix. We may require that you supply a written request, so as to ensure safety and compliance with relevant laws and regulations in China mainland. We may first ask you to provide your transaction password to verify your identity, before your request can be processed. If you contact us using the contact information set out in this Privacy Policy, please contact us by email or post. We will respond to your request within 15 working days or the time

limit prescribed by laws and regulations.

If we decide not to respond to your request, we will inform you of the decision and the reasons for the decision, in which case you may get in touch with us using the contact information set out in this Appendix.

5 Information about Minors

If you are a minor, we will refuse to provide you with related services according to applicable laws and regulations. If we find that you are a minor, we will refuse to provide you with related services and delete your personal information promptly in accordance with applicable laws and regulations. In the event that, at any time, a guardian reasonably believes that we have collected personal information of minors, please contact us through the contact information set out in this Appendix.

6 Update and Notification

We will publish changes made to the Statement and this Appendix on our website and via the app, and notify you of the revised policies by posting them on our website or through other means that may be appropriate for you to receive the notices. In the case of substantial changes, we will also notify you using a more prominent form of presentation such as website and app pop-ups, in which case, if you continue to use our services, you will be deemed to have agreed to be bound by the revised and updated Statement and Appendix. We recommend that you regularly review the latest versions of the Statement and Appendix.

7 How to Contact Us?

If you have any questions, suggestions or complaints about this Appendix, please contact us using following contact information specified in this Appendix:

(1) E-mail: cs@futu.hk

(2) Correspondence address: Futu Data and Personal Data Protection Centre, Futu Securities International (Hong Kong) Limited: [34/F, United Centre, 95 Queensway, Admiralty, HK]

We will review your feedback as soon as possible, and reply within 15 working days or the time limit prescribed by laws and regulations.

Note In the event of any inconsistency between the English and Chinese versions of this Appendix, the Chinese version shall prevail.

(End)

Notice Regarding Use of AI Model in Futu Securities Account Opening Process ("AI Notice")

To enhance account opening efficiency and customer experience in response to the increasing volume of universal account opening applications, Futu Securities has integrated an AI model into its universal account opening process. This AI model will be used to receive and analyze personal data submitted by clients for preliminary account opening review. You are hereby notified of the following:

Unless the context otherwise requires, terms defined in Futu Securities' Privacy Policy and Personal Information Collection Statement ("Privacy Statement") shall have the same meaning in this AI Notice.

Application:

1. This AI Notice forms part of the Privacy Statement. By opening a universal account with Futu Securities, you acknowledge that you have understood and agreed to this AI Notice and Privacy Statement.
2. If you do not agree to the terms of this AI Notice, Futu Securities may be unable to process your application for a universal account.

Purpose of Personal Data Use:

3. Without limiting Futu Securities' use of your personal data for other purposes stated in the Privacy Statement, Futu Securities' use of the AI model involving your personal data shall be strictly limited to processing your application for universal account opening with Futu Securities.
4. The AI model's preliminary review constitutes merely part of Futu Securities' universal account opening process. Futu Securities reserves the final decision over the account opening applications. Outputs generated by the AI model are for internal reference of Futu Securities only, and clients shall have no right to request the disclosure of such outputs.

Cross-border Transfer and Storage:

5. Futu Securities' universal account opening process will involve the sharing/transfer your personal data to servers outside Hong Kong based on the location of the AI model server.
6. To Futu Securities' understanding, personal data transferred outside Hong Kong for the purpose of processing universal account opening applications using the AI model will be deleted upon completion of the account opening process and will not be permanently stored. Your personal data will be stored in servers located in Hong Kong.

AI Model:

7. Technical details of the AI model used by Futu Securities are available at https://www.futuhk.com/support/topic2_2092.