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## Hong Kong Privacy Notice

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## Hong Kong Privacy Notice

Global Investment Strategy HK Limited ("GIS HK", "we", "us") is committed to protecting personal data in accordance with the Personal Data (Privacy) Ordinance (Cap. 486) of Hong Kong ("PDPO"). This Privacy Notice explains how we collect, use, disclose, store and protect personal data when carrying on our business in or from Hong Kong.

### 1. Scope and Application

This Privacy Notice applies to personal data of investors, clients, counterparties, officers, employees, service providers and other individuals whose personal data is collected or processed by GIS HK in connection with its Hong Kong activities.

### 2. Personal Data Collected

We may collect personal data including identification details, contact information, employment or professional information, transactional data, regulatory and compliance information, and other data necessary for our business and regulatory purposes.

### 3. Purposes of Collection and Use (DPP1 & DPP3)

Personal data is collected and used for purposes directly related to our business operations, regulatory obligations, risk management, investor relations, and internal administration, or for a purpose directly related thereto.

### 4. Accuracy and Retention (DPP2)

We take reasonable steps to ensure personal data is accurate and up to date. Personal data is retained only for as long as necessary, taking into account business needs, regulatory record-keeping requirements and applicable laws.

### 5. Data Security (DPP4)

Appropriate technical and organisational safeguards are applied to protect personal data against unauthorised or accidental access, processing, erasure, loss or use.

### 6. Openness (DPP5)

Information about our data protection policies and practices is made available through this Privacy Notice and related internal policies.

### 7. Data Subject Rights (DPP6)

Individuals have the right to request access to and correction of their personal data in accordance with the PDPO. Requests will be handled within statutory timeframes and subject to applicable exemptions.

### **8. Transfers and Outsourcing**

Personal data may be transferred to service providers or group entities for business or regulatory purposes. We apply contractual and practical safeguards consistent with PDPO requirements. Section 33 of the PDPO has not yet commenced; nevertheless, we adopt reasonable measures to protect personal data transferred outside Hong Kong.

### **9. Direct Marketing**

Personal data will not be used for direct marketing without prescribed consent in accordance with the PDPO.

### **10. Data Incidents**

Data incidents are handled promptly in accordance with our internal incident management procedures and PCPD good practice guidance.

### **11. Contact Details**

Requests or enquiries concerning personal data should be directed to:

Global Investment Strategy HK Limited

Room 4337, 43/F, Champion Tower

3 Garden Road, Central, Hong Kong

### **12. Changes to This Privacy Notice**

This Privacy Notice may be updated from time to time. The latest version will be made available upon request.