

ZA International Financial Services Limited (“ZAIIF”, “we”, “us” or “our”)  
**Personal Information Collection Statement relating to the Personal Data (Privacy)  
Ordinance (“Statement”)**

This Statement applies only to information submitted and collected through your registration as ZA Fam membership under ZAIIF, use of our services or participation in any of our ZAIIF events, ZA Coin Programme or other activities made available through this site (collectively, “Event”). By submitting your personal information, you agree to this Statement, as amended from time to time. Please also refer to the terms and conditions of our Privacy Policy as set out on [https://cdn.za.group/if/za-group-portal-web/assets/files/ZAIIF\\_PPS\\_Eng.pdf](https://cdn.za.group/if/za-group-portal-web/assets/files/ZAIIF_PPS_Eng.pdf)

We regularly review this Statement and may from time to time revise its terms and conditions by updating it on our site <https://zaif.za.group/> (“Site”). By continuing to use the Site or our services after the revised Statement is posted, you agree to this Statement as revised, so please do visit our Site or our periodically for updates.

## **Collection**

We may collect your personal data in connection with purposes set out in this Statement. You agree that you can only use the Site, our services or participate in any of our Events if you accept this Statement. By registering with our Site or using our services or participating in the Event you agree to be bound by this Statement. If you do not agree to this Statement, you must not register with us, use our services or participate in the Event.

If the information requested by us is not provided, we may not be able to process your registration, provide our service or participation in the Event.

If at any time you provide us with the personal data of any third party (e.g. employees, representatives, etc), you warrant and undertake that you have obtained the consent of the relevant individual to provide their personal data to us, for us to use and transfer their personal data in accordance with this Statement.

We may also collect your information, directly or indirectly, in the ordinary course of our business, including information collected through the use of our websites, cookies or other services.

## **The Personal Data We Collect**

We will collect and process some or all of the following Personal Data about you:

**Information about you and your membership:** Your personal information such as your name, email address, contact details, your membership number, your username and records of your earning and redemption activities ;

**Your payment details:** Payment details used to redeem our ZA Coin such as card holder name, debit card number and expiry date, account information relating to other payment services (such as online or mobile payment services ) and billing information;

**Information we collect in relation to your earning of ZA Coin:** Information about your earning of ZA Coin with our ZhongAn Group.

**Our interactions with you:** A record of any interactions and correspondence between us such as calls made through our call centre, any interactions you have with our staff or representatives for research (e.g. conversations with research interviewer), and non-

research (e.g. AML events) purposes and any interactions with us or posts that refer to us on social media;

**Your interests, preferences, habits and opinions:** Information that we collect about your interests, preferences, habits and opinions including products, services and events you are interested in, your opinion on our offers, your feedback and satisfaction scores so as to provide a more personalised service and more relevant communications to you regarding your redemption experiences;

**Survey information:** Your responses to surveys, workshops, seminars, and contests conducted by us or on our behalf; and

**Your use of our website and social media platforms:** Details of your visits to our website, your use of social media platforms and other information collected through cookies and other tracking technology including information that you look at. We may also collect information about you that is publicly available online, including your social media profiles.

## How we collect Personal Data

We will collect some Personal Data from you directly. We will collect other Personal Data from ZhongAn Group and third parties including:

- a) our service providers and agents such as our call centre agents who provide customer service (if any);
- b) the third parties that we partner with in connection with ZAIF, including finance and insurance partners, transportation service providers, utility companies, healthcare-related service providers, charity and retailers;
- c) our third party marketing and research partners;
- d) organisations which conduct credit and fraud checks; and
- e) providers of third party websites, apps and social media platforms.

## Why we collect and use your Personal Data

When you share information with us, you help us make our services to you better. Here are some of the ways we will use your Personal Data.

- (a) **To operate and facilitate your participation in ZA Fam, ZA Coin Programme:** Where you are a member of ZA Fam, we will use Personal Data that we collect about you for the operations of ZA Fam such as processing your membership application and to ensure that you get the benefit of our ZA Coin programme including to track your earning and redemption activities and record your ZA Coin.
- (b) **To administer your earning and redemption arrangements:** To administer your earning and redemption arrangements including cash rebate to send you service-related communications, to identify and verify your identity in connection with the services we provide and to provide or facilitate any special assistance you may have asked for;
- (c) **To tailor and personalise the offers we provide to you:** To tailor and personalise the offers that we provide to you. We may also tailor our communications to you and tailor what we present to you to match your preferences and interests better;
- (d) **To provide member support:** For member support purposes including responding to your application, enquiries or feedback and providing general assistance and relaying your feedback and comments;

- (e) **For marketing purposes:** For providing you with marketing communications, as explained in more detail in section “Use of data in Direct Marketing and Provision of Direct Marketing” below;
- (f) **For social interactions:** To administer campaigns, workshops, seminars, and contests conducted by us when you choose to participate in them, including disclosing the winners of any such contests;
- (g) **To improve ZA Fam and ZA Coin Programme:** For the purposes of improving our programme for the benefit of our members generally, including to ensure that our websites, and web pages (including social media pages) function correctly and in accordance with your preferences and circumstances;
- (h) **For legal and administrative purposes:** For legal and administrative purposes such as to comply with our legal and regulatory obligations, verifying and processing payment, screening against fraud, criminal or unlawful activities, or abusive redemption activities and identify suspicious membership accounts that may breach the ZA Coin Terms & Conditions, accounting, billing and audit purposes, developing, maintaining and testing our systems, for claims handling and for understanding, exercising, enforcing or protecting our legal rights and those of others.

## **Who we share your Personal Data with**

ZhongAn Group for marketing, research and analytics purposes: We may disclose your Personal Data to ZhongAn Group, so they can provide marketing services or conduct marketing or social interaction activities on our behalf such as campaigns, promotional activities, contests, market research, member surveys and data analytics to help us improve and tailor our marketing activities, products and services.

Subject to us having obtained appropriate consent from you, we may also disclose your Personal Data to ZhongAn Group in order that they may market their products and services to you.

Government and regulatory bodies and other individuals, bodies and organisations (for example regulators and the police) for the purposes of complying with our legal obligations, to enable us to provide our offers to you, as well as for legal and administrative purposes: “We may disclose your Personal Data to governments, regulatory authorities and bodies and to other individuals, bodies and organisations such as dispute resolution, prosecution and law enforcement bodies, legal advisers, and organisations which conduct credit and fraud checks, for the purposes of complying with our legal obligations.

For the purposes set out above, we may transfer any personal data held by us to: (a) any member of the ZhongAn Group; and (b) third party service providers of any member of the ZhongAn Group (including those that provide back-office or IT services, event management services or marketing and promotional services or security services in relation to the Event) whether within or outside Hong Kong.

## **Use of data in Direct Marketing and Provision of Direct Marketing**

Subject to your consent (which includes an indication of no objection), we intend to use your name, email address and telephone number to send you information relating to:

- (a) sending or showing you updates on latest news, offers and promotions, including workshops, seminars, and contests, in connection with ZA Fam and ZA Coin Programme; (ii) for sending or showing you joint marketing offers about our ZhongAn Group including finance and insurance partners , and charity; or (iii) for tailoring and tracking your interactions with internet banner advertisement and links from third party websites to our website.
- (b) analysing our members' preferences and market trends and derive insights, which we may use to tailor the types of offers that we present to you. This may involve us combining Personal Data that we hold about your use of our services with information that we have collected about your web usage. We may also combine information that we have collected about you with information that we have collected about our other customers in order to derive these insights and establish market trends.
- (c) communicating marketing, promotions and research invitations to you by email, SMS, telephone, or online (including online banner advertisement) and, as appropriate and where required, we will ask you for your consent, or otherwise provide you with the opportunity to choose not to receive marketing, at the time we collect your data.
- (d) providing an option to unsubscribe or opt out of further communication on any direct marketing or provision of direct marketing communication sent to you. You may also opt out by contacting us as set out in below "Your Rights and Contacting Us" section.
- (e) Please note that if you choose to unsubscribe or opt out from the use of your personal data in direct marketing, you will still continue to receive administrative emails, account summaries and updates to our services.

## **Consequence of failing to provide Personal Information**

Unless otherwise specified by us, it is mandatory for you to provide the Personal Information requested by us. If you do not provide such Personal Information, we may not be able to provide you the product or service that you've requested.

## **Your Rights and Contacting us**

You have the right to:

- (a) check whether we hold your personal data and to have access to that personal data;
- (b) require us to correct any personal data which is inaccurate;
- (c) ascertain our policies and practices in relation to the personal data and to be informed of the kind of personal data held by us; and
- (d) request us not to use your personal data for direct marketing purposes as described in the above "Use of data in Direct Marketing and Provision of Direct Marketing" section, in which case we will cease to do so at no cost to you.

Any personal data access request should be made in writing to our Data Protection Officer at ZAIFDPO@za.group. We reserve the right to charge you a reasonable fee for complying with any request for access to your personal data.

Nothing in this Statement shall limit your rights under the Ordinance.

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

## **Definitions**

In this document, unless inconsistent with the context or otherwise specified, the words below shall have the following meanings:

<b>“ZAIF”, “we” or “our”</b>	means ZA International Financial Services Limited
<b>“ZA Coin”</b>	is a unit under the ZA Coin Programme offered and operated by ZAIF in accordance with these terms and conditions. You are required to registered as a member of ZA Fam and agree to the terms and conditions herein.
<b>“ZA Coin Programme”</b>	means the reward programme offered and operated by the ZAIF
<b>“ZA Card”</b>	includes a virtual debit card and the corresponding physical debit card issued by the Bank;
<b>“ZA Fam”</b>	a membership programme offered and operated by ZAIF.
<b>“ZhongAn Group”</b>	ZhongAn Technologies International Group Limited and its subsidiaries including but not limited to ZA International Financial Services Limited, ZA Life Limited, ZA Bank Limited and ZA Care Limited as changed from time to time.