

Privacy Notice for HKEX Foundation

HKEX Foundation Limited, Hong Kong Exchanges and Clearing Limited and its affiliated companies referred in the Annex (together "HKEX", "we", "our" or "us") are committed to protecting all Personal Data under our custody, control, or possession. "Personal Data" is any information that relates to an identifiable individual or can be used to identify an individual (referred to as "you" or a "Data Subject" in this notice).

This privacy notice for HKEX Foundation ("Notice") applies to Personal Data of Data Subjects that we collect and generate from any activities, events, initiatives, programmes, schemes, campaigns and/or projects that are organized, arranged or otherwise supported by HKEX Foundation including, but not limited to, the focus areas of promoting financial literacy, social empowerment, talent development and environmental sustainability (collectively, "Projects").

Some of these Projects may also be co-organized, arranged or supported by independent third parties (e.g. other charitable organizations). We encourage you to read the privacy policies of these third parties as we cannot control nor are we responsible for how they handle your Personal Data for the relevant Projects.

This Notice sets out what Personal Data we process, how we process it, who it might be transferred to, how we protect it, and rights under the applicable data protection laws. We will revise this Notice from time to time to reflect any relevant developments at HKEX relating to our operations or services for or in relation to the relevant Projects, or due to changes in the applicable laws and regulations. To the extent required under applicable data protection laws, we will notify Data Subjects of the material changes and, where required, seek their consent.

If the correct Personal Data is not submitted to us, we may not be able to process any applications and/or submissions that you may make for or in connection with the relevant Projects and/or we may also be unable to process requests from the Data Subjects relating to their rights under the applicable data protection laws. HKEX is also required to perform certain regulatory functions which may not be possible if we are not provided with the requested Personal Data.

This Notice is available in English and Chinese versions. In the event of any conflicts or discrepancies between these different language versions, the English version will prevail.

What Personal Data do we collect and how do we collect it?

Information directly submitted by or collected from you:

- Identity data such as name, nationality, identification document number, and position in a company.
- Contact data such as phone number, contact address, email address, and contact preferences.
- Communications data such as voice recordings and transcripts from logs of telephone calls to HKEX.
- Social Media data such as User IDs, posts, tweets, and comments.
- Due diligence data such as the position in management or a board.
- Financial data such as bank account details, credit card number, billing transaction details.
- Regulatory filing and disclosure data such as name, age, education, work experience, position and shareholding in a company.
- Usage data such as your activities/interactions in the relevant Projects and/or on our relevant websites.

Information collected automatically from a device or system:

- Technical data such as unique device identifiers, IP address, browser type and settings.
- Usage data such as open rates, click through rates, and other metrics on when and how our Website is used.
- Visual data such as videos and photographs.

Information collected from third parties:

- When you provide any Personal Data for the relevant Projects co-organized, arranged or supported by a third party.
- When information is retrieved from publicly available sources such as: (i) print and digital media; (ii) promotional material relating to you as the Data Subject; (iii) websites of organisations with which you as the Data Subject are connected; and (iv) government, regulator, or industry registries.
- When we have engaged another party to enable or support our relevant operations and services for or in relation to the relevant Projects.
- When content has been provided to us to be used in the relevant Projects.

For Data Subjects in Mainland China

- to verify your identity, conduct fraud monitoring and comply with regulatory requirements, we may process your name, nationality, identity document number or other personally identifiable number, and signature;
- to communicate with you and issue Marketing Communications (defined below), we may process your name, phone number, email address, contact preference, voice recording and transcripts from logs of telephone calls, our correspondence with you and your Social Media data such as User IDs, posts, tweets, and comments;
- to conduct due diligence, we may process your position in management or a board;
- to process your applications and/or submissions for the relevant Projects, and/or to register you for the relevant Projects, we may process your name, company name, email address, phone number, and any other Personal Data specified in your submitted forms and documents;
- to perform network security measures, we may process your unique device identifiers, IP address, browser type and settings;
- to prepare our publication and promotional material, we may process and publish the videos and photographs of you; and
- to conduct analytics and profiling and to provide you with personalised information, we may process unique device identifiers, details of your visits to our relevant websites or social media platforms collected through cookies or other tracking technologies.

For Data Subjects who are California residents

To the extent the California Consumer Privacy Act and the California Privacy Rights Act apply, the types of Personal Data we collect (and have collected in the past 12 months) includes the categories listed below, as defined by California state law:

Category	Source	Purpose of Processing
Personal identifiers such as your name, postal address, email address, social security number*, and passport number*.	Collected directly from you or the relevant third parties mentioned in this Notice.	For security management, to prevent illegal activities and to administer your relationship with us, including to provide you with services / benefits and to meet our legal obligations.
Information About You including your name, signature, social security number*, address, telephone number, passport number, education, bank account number and credit / debit card number.		
Professional or employment-related information		To administer your relationship with us, including to meet our legal obligations and to efficiently manage our operations and activities.

Category	Source	Purpose of Processing
Legally protected characteristics including marital / familial status, age, disability, sex, national origin, religion, colour, race, sexual orientation, gender identity / expression, veteran status, medical condition, ancestry, and source of income.		To administer your relationship with us, including to provide you with services / benefits, to meet our legal obligations, and to comply with our diversity and inclusion objectives.
Internet usage information such as your browsing history, search history, and your interaction with our Website, applications or advertisement.	Typically collected from you through cookies or similar technology.	For security management, to prevent illegal activities and to administer your relationship with us, including to meet our legal obligations and efficiently manage our operations and activities.
Geolocation information such as the country / region you are located at (but not your precise geolocation).	Collected from your interaction with our websites / systems.	
Recordings such as audio, electronic and visual recordings.	Collected from recordings of customer service calls, devices with geo-tracking and through internal and external CCTVs.	For quality control and training purposes, security management, to prevent illegal activities, and to meet our legal obligations.

Personal Data marked with an * indicates Sensitive Personal Data, as further discussed immediately below.

Sensitive Personal Data

Some Personal Data that we process is classified as “**Sensitive Personal Data**” under applicable data protection laws. What is considered Sensitive Personal Data varies by jurisdiction. If we are required to process Sensitive Personal Data, we will only do so in accordance with applicable law, and with your consent to the extent required under applicable data protection laws.

Our processing of Sensitive Personal Data in certain jurisdictions for the purposes of this Website requires specific disclosure:

Mainland China

- To verify your identity to process your Data Subject Requests and conduct due diligence, we may process your specific identity information in the form of identification documents or vehicle licence numbers;
- To provide regulatory disclosure of interest under applicable law, we may process and publish the Chinese character code on your Hong Kong identity card;
- To communicate with you and conduct due diligence, we may process your residential address;
- To process payment transactions with you, we process your financial account information, credit card numbers and billing transaction details; and
- To provide access to services delivered through our relevant websites and conduct statistical analysis, we may process unique device identifiers, IP address, browser type and settings, open rates, click through rates, and other metrics on when and how our websites are used.

You need to carefully consider whether your Sensitive Personal Data should be disclosed to us through your application and/or participation in our Projects. It is necessary for you to provide us with such Sensitive Personal Data, so that we can provide certain services to you in relation to the relevant Projects. If you do not provide us with your separate consent, we may not be able to provide corresponding services to you for the particular Project(s) concerned, but it would not affect our other services to you.

California

We do not use or disclose Sensitive Personal Data we collect for purposes other than those generally permitted under California law, including as needed to perform our services, verify and maintain the quality and safety of our services, and prevent fraud or illegal actions. We collect the following Sensitive Personal Data:

- Social security number, driver's licence number or other state ID number, and passport information: This information is collected directly from you or our service providers. A social security number is necessary to administer your relationship with us, particularly as it relates to anti-money laundering and other due diligence compliance checks.

Sometimes we will aggregate information into aggregated data, but aggregated data will not necessarily constitute Personal Data. Any aggregated data that does constitute Personal Data will be processed in accordance with this Notice.

Why do we use the Personal Data and how do we use it?

The “**Legal Basis**” is what data protection laws set out as the lawful reasons for processing Personal Data, such as a legitimate interest for the operation of HKEX Foundation so long as it does not materially and adversely impact your interests, rights, and freedoms.

Legal Basis	Purpose
Legitimate Interests	<ul style="list-style-type: none">• Identity and contact data to maintain our correspondence databases for administrative and marketing purposes• Identity data to facilitate registration for the relevant Projects• Communications data to facilitate internal training and enhance the quality of our service• Identity and contact data to update you on changes to the relevant Projects for which you have already registered• Identity and contact data to inform you of logistics to the relevant Projects which you are already registered• Identity, contact and Social Media data to respond to your enquiries and feedback• Identity and visual data to maintain safety and security at our premises• Information such as contact, social media, and usage data to conduct research and statistical analysis for developing the relevant Projects and enhancing your experience with our relevant websites and related digital content• Information such as usage data to evaluate our marketing and development programmes for the relevant Projects• Visual data to record in-person events and webinars for circulation• Social Media data to display information you choose to share publicly

Legal Basis	Purpose
	<ul style="list-style-type: none"> • Technical and technical account data to maintain the security of our networks, and systems • Technical data to optimise the performance of our relevant websites and test the features and functionality • Information such as Identity and financial data to conduct fraud monitoring • Information such as technical data to meet our audit requirements • Information such as identity and due diligence data to protect HKEX, its staff and assets in any actual or potential dispute • Information such as identity and due diligence data in connection with an acquisition / reorganisation within the HKEX Group • Information such as financial and technical data to administer our relationship with our third party service providers (as summarised in this Notice)
Consent	<ul style="list-style-type: none"> • Provide our Marketing Communications (defined below), to the extent consent is required by applicable law • Issue invitations to events • Partner with third parties for co-branded activities and content <p>Separate consent</p> <ul style="list-style-type: none"> • Required if you are a Data Subject in Mainland China and we need to process your Sensitive Personal Data or share your Personal Data with a third party, publicly disclose it, or transfer it outside Mainland China
Contractual	<ul style="list-style-type: none"> • Process an application or submission for the relevant Projects • Enable access to our relevant websites • Provide you with informational content in accordance with our terms and conditions • Publish our announcements
Legal or Regulatory Obligations	<ul style="list-style-type: none"> • Discharge the functions of HKEX Foundation Limited as a recognized charitable entity under Section 88 of the Inland Revenue Ordinance of Hong Kong, and/or the functions of HKEX and any company of which HKEX is the recognised exchange controller (as the case may be) • Comply with a court order, subpoena or other legal process • Comply with a request by a government authority, law enforcement agency or similar body • Comply with laws applicable to us including domestic data protection laws

Direct Marketing

Before we (1) use Personal Data to send direct marketing (including but not limited to for the solicitation of donations or contributions for charitable, philanthropic or other purposes) relating to the relevant Projects, and/or (2) share Marketing Data (as further defined in this section) within HKEX group (including HKEX group members covered under this Notice) in order to send direct marketing and promotional and informational content relating to the relevant Projects ("**Marketing Communications**"), we may need to first ask for permission by obtaining the Data Subject's explicit opt in or indication of no objection as required or permitted under the applicable data protection laws.

To provide our Marketing Communications, we will usually use the name, job title, phone number, email address and contact preferences and, occasionally, we may also make use of the marketing profiles generated from the use of our relevant websites, cookies and similar tracking technologies combined with information directly obtained from the Data Subject and other sources ("**Marketing Data**").

At any time, the Data Subject can opt out or change their marketing preferences in terms of the frequency, delivery channel, and category or type of Marketing Communication – this right exists even if we are not required to obtain consent for the sending of Marketing Communications. To action this right, the Data Subject can provide their full name, email address, log in name (if applicable) and details of the relevant Projects to which they have applied/registered for or participated into the address in the "Contact Us" section below. We will provide a reminder of this right in each of our Marketing Communications.

Please note that even if an opt-out request has been made, we may still need to send necessary communications such as those relating to the administration of the relevant application/registration for or participation in the relevant Projects. In addition, it does not impact the lawfulness of our use of the Personal Data prior to the consent being withdrawn.

Cookies and similar technologies are used in the Marketing Communications to analyse engagement and effectiveness. The specific tools that enable this will track and record clicks and hovers, searches, and distinguish between known and unknown users. For further details on how we adopt cookies and other similar technologies, please refer to our [Cookies Notice](#).

Occasionally, we will engage third party service providers to support our marketing initiatives and enabling members of the HKEX group to send Marketing Communications. Where required under applicable data protection laws, HKEX shall obtain the Data Subject's prior consent. Where third party platforms are utilised, we also recommend that you refer to their privacy statements.

Do we disclose Personal Data to third parties or transfer it to another jurisdiction?

We sometimes discloses Personal Data to third party organisations and partners that are involved in the relevant Projects, or comply with applicable laws. These third party Personal Data recipients and specific transfer purposes are set out below:

- Affiliates of Hong Kong Exchanges and Clearing Limited involved in the relevant Projects and/or for Marketing Communications
- Third party organizations (e.g. other local charitable organizations) involved in the relevant Projects
- Organisations involved in hosting or organising activities for us
- Our vendors who provide marketing and advertising support
- Our contractors or vendors who provide telecommunications, IT security, or other technical assistance
- Our payment service providers and processors
- Our vendors who provide strategy or other consultancy services in respect of our strategies and operations
- Our agents, contractors or vendors who provide administrative support to us
- Our professional service providers such as legal advisors, tax consultants, and accountants

To fulfil our legal obligations, we may also share your Personal Data with courts, regulatory authorities, government and law enforcement agencies, and other public authorities.

Further details about these third parties may be provided upon request to the address in the “Contact Us” section below. We shall endeavour to provide such information to the extent we are required to do so under applicable data protection laws.

Where required under applicable data protection laws, HKEX will only disclose Personal Data to third parties with your prior consent. In certain jurisdictions, HKEX may also be required to take additional measures prior to giving effect to such transfers (e.g. carrying out privacy impact assessments prior to the transfer). HKEX may process Personal Data outside of the Data Subject’s home jurisdiction, including sharing the Personal Data with third parties (such as suppliers). HKEX shall use reasonable endeavours to ensure that the laws and regulations of the destination jurisdiction shall offer the same or comparable level of protection for Personal Data. Where this is not the case, we shall ensure appropriate safeguards are in place at the time of the transfer by implementing standard contractual clauses or other data transfer mechanism approved by the authorities of the relevant jurisdiction. Where required under applicable data protection laws, we shall also carry out additional measures for the offshore transfer such as carrying out a privacy impact assessment.

The regions where the Personal Data may be hosted or transferred to will vary from time to time, but typically include Hong Kong, the UK, US, EU, Switzerland, Singapore, Japan, India, and Mainland China.

Further details on the processing locations and our measures for safeguarding international transfers (including adequacy decisions) may be obtained upon request to the address in the “Contact Us” section below.

How long do we keep the Personal Data?

Personal Data is retained in accordance with our internal policies, including our Group Record Retention Standard, and applicable law.

Your Personal Data will be retained by us for as long as is necessary to fulfil the purposes required for the processing. HKEX will also refer to the following factors when determining or confirming the appropriate retention period of Personal Data:

- the original purpose of collection
- the termination of any contract involving the Data Subject’s Personal Data
- the limitation period as defined in the applicable law
- the existence of any legal or regulatory investigations or legal proceedings
- specific laws or regulations setting out HKEX’s functions, obligations, and responsibilities
- retention period set out in non-statutory guidelines issued by our regulators or international bodies
- the sensitivity of the Personal Data and the degree of risk from the associated processing activity

For Data Subjects in Mainland China, we usually retain the Personal Data for not more than 3 years from the last activity or interaction with us. Further details of our Personal Data retention period may be obtained upon request to the address in the “Contact Us” section below.

Where any Personal Data is no longer necessary for the purposes for which it is collected, we shall cease the processing of that Personal Data as soon as reasonably practicable (although copies may be retained as necessary for archival purposes, for use in any actual or potential dispute, or for compliance with applicable laws), and take reasonable measures to destroy the relevant Personal Data.

How do we keep your Personal Data secure?

We will take all practicable and reasonable steps to promote the security of the Personal Data we process in a manner consistent with applicable data protection laws and established international security standards. This includes physical, technical and administrative safeguards, to help prevent unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, and the loss of any storage medium or device on which the Personal Data is stored, and to maintain the general security of the data.

Whilst we endeavour to protect the Personal Data collected or generated by us or transferred to us, we request that visitors of the relevant websites maintain up-to-date security settings on their systems.

Where we occasionally provide links to third-party websites, this Notice will not apply and we recommend that you check their respective privacy statements to understand how your Personal Data will be governed.

Rights over the Personal Data

As a summary, the following Data Subject rights may be exercised to the extent provided under applicable data protection laws:

- confirm whether we hold the Data Subject's Personal Data and the type of Personal Data held by us
- access a copy of the Personal Data held by us
- delete your Personal Data held by us
- correct or supplement your Personal Data where it is found to be inaccurate
- restrict the processing performed on your Personal Data
- object to our continued use of your Personal Data for direct marketing purposes, or withdraw consent to the processing of your Personal Data in other situations (e.g. processing carried out on the basis of our legitimate interests)
- transfer the Personal Data to another party in a machine readable format

In certain jurisdictions, Data Subjects may also be provided with additional rights.

California

- Request that we disclose to you Personal Data we have collected about you, the categories of sources from which we collected the information, the purposes of collecting the information, the categories of third parties with whom we have shared the information, the categories of Personal Data that we have shared with third parties for a business purpose, the categories of information sold, and the categories of third parties information is sold to (if any).

Mainland China

- Explanation on the rules of processing the Personal Data
- Extension of the Data Subject rights to a surviving next-of-kin where the applicable laws permit
- Transfer of your Personal Data to your designated party, where the applicable laws permit
- Cancellation of any platform account that you have with us

United Kingdom and Europe

- Right to object to processing. You have the right to object to processing to the extent we process your Personal Data because the processing is in our legitimate interests.

Singapore

- In certain circumstances, receive information about the ways in which the Personal Data has been or may have been used or disclosed by us in the year before the date of the request.

Where these rights apply, we shall use reasonable endeavours to fulfil the request or provide an explanation. Please note that under applicable data protection law, we are only obligated to respond to Personal Data requests from the same consumer up to two times in a 12-month period, and we may be limited in what Personal Data we can disclose which is also for the protection of your Personal Data.

We will endeavour to respond to you as soon as possible and, in any event, within the timeframe stipulated under the applicable data protection law. In the event of a potential delay, we will provide an explanation and the expected timeframe for delivery. Under applicable data protection law, we may also be required to charge a reasonable fee for the cost of processing the request.

Please note that we may need to seek confirmation of identity or clarification in order to fulfil the request. If you as the Data Subject would like to appoint an authorised agent to make a request on your behalf, we may require you to verify your identity with us directly before we provide any requested information to your authorised agent unless your authorised agent has power of attorney or acts as a conservator. Information collected for purposes of verifying your request will only be used for verification. For deletion requests, you will be required to submit a verifiable request for deletion and then confirm separately that you want Personal Data about you deleted.

If you would like to exercise your data subject rights, please contact the HKEX Group Data Protection Office via one of the channels under the Contact Us section below.

Do Not Track

Some browsers incorporate a “Do Not Track” feature that lets you tell the websites you browse that you do not want your online activities to be tracked. We are currently in the process of configuring our Website to detect and respond to these “Do Not Track” preference signals. In addition, our Website shall support the Global Privacy Control described at <https://globalprivacycontrol.org/>, which you can enable by downloading a participating browser or browser extension.

Minors

As our websites are not aimed at children, we only knowingly process Personal Data of minors when they visit our premises. If we discover that processing has taken place in any other circumstances, then we shall ensure it has occurred with a Lawful Basis or otherwise cease the processing and make reasonable efforts to dispose of the Personal Data in accordance with our internal policies.

The age of minors in respect of Personal Data consent differs across jurisdiction:

California, United Kingdom and Europe	<ul style="list-style-type: none">• under the age of 16 years old.
Hong Kong	<ul style="list-style-type: none">• under the age of 18 years old.
Mainland China	<ul style="list-style-type: none">• under the age of 14 years old. <p>Where we have obtained separate consent from a minor’s parents or guardians, we will process the minors’ Personal Data in the same manner and in the same locations as set out in this Notice.</p>
Singapore	<ul style="list-style-type: none">• under the age of 21 years old.

Contact Us

If you have any questions or comments relating to the content of this Notice, report any concerns about our Personal Data processing, or if you would like to exercise your Data Subject Rights, please contact us through the channels below:

By Post:

Group Data Protection Officer
GDPO Office
Hong Kong Exchanges and Clearing Limited
8/F., Two Exchange Square
8 Connaught Place
Central
Hong Kong

UK Representative: 10 Finsbury Square, London, EC2A 1AJ, United Kingdom

EU Representative: De Cuserstraat 91, 1081 CN Amsterdam, Postbus/PO Box 7902, 1008 AC Amsterdam, Netherlands
By email: DataPrivacy@hkex.com.hk

Please include the following details in any request to exercise your Data Subject Rights:

Identity of Data Subject

- *Full Name*
- *Company Name*
- *Email Address*
- *Address of principal residence*
- *Identity particulars if acting on behalf of a Data Subject*
- *Contact details held on file or Document(s) to verify identity*

Nature of the Request

- *Product or Service to which the Data Subject has subscribed*
- *Specific Right*
 - *Purpose of the Request*
 - *Preferred communication channel and address for receiving the results of the request*
 - *Document(s) to support the rights request*

Any Data Subject who has contacted us to express concerns about the way we manage their Personal Data and is of the view that we have not addressed the matter satisfactorily, may also contact the relevant privacy regulator to resolve the matter or seek assistance.

The privacy regulator in the United Kingdom is the Information Commissioner, who may be contacted at <https://ico.org.uk/make-a-complaint/> or by post to: Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, United Kingdom.

If you live outside of the UK, you may contact the relevant data privacy regulator in your country of residence.

Last Updated: 30 September 2025

Annex

HKEX group entities/affiliated companies include but are not limited to those listed below. For the contact details of the following entities, please refer to the “Contact Us” section.

- The Stock Exchange of Hong Kong Limited
- Hong Kong Futures Exchange Limited
- Hong Kong Securities Clearing Company Limited
- HKFE Clearing Corporation Limited
- The SEHK Options Clearing House Limited
- OTC Clearing Hong Kong Limited
- HKEX Information Services Limited
- HKEX Information Services (China) Limited
- HKEX (China) Limited, HKEX Investment (China) Limited
- HKEX Investment (Hong Kong) Limited
- Hong Kong Futures Exchange Limited Singapore Branch
- The Stock Exchange Of Hong Kong Limited Singapore Branch
- HKEX (U.S.) LLC