

Privacy Notice for Fast Interface for New Issuers (“FINI”)

The Privacy Notice for FINI (“**Notice**”) applies to (i) individuals who, in their capacity as *investors*, submit their Personal Data to HKEX through a FINI User (“**you**”, “**your**”), (ii) individuals who, in their capacity as *directors or authorised representatives* for Issuers, submit their Personal Data to HKEX through a FINI User (“**you**”, “**your**”), and (iii) individuals who, in their capacity as *Delegated Administrators or other authorised representatives* of FINI Users, directly submit their Personal Data to HKEX (“**you**”, “**your**”).

Hong Kong Securities Clearing Company Limited, Hong Kong Exchanges and Clearing Limited and its other [affiliated companies](#) (together “**HKEX**”, “**we**”, “**our**” or “**us**”) are committed to protecting your Personal Data. “**Personal Data**” is any information that relates to an identifiable individual or can be used to identify an individual – sometimes the individual is referred to as a “**Data Subject**”.

Please ensure that all Personal Data which you submit are true, accurate and complete. Broadly, if the correct Personal Data is not submitted to HKEX, or if you are unable to provide the Personal Data which are mandatory, then our management of public offer operations shall be impacted; as examples, we may be unable to provide a Data Subject with access to and use of FINI for the submission and retrieval of documents and information for processing matters related to new listings, and access to functions related to those processes, review applications for new listings in relation to share settlement, administer subscriptions for Hong Kong Public Offer Shares and/or International Offer Shares, announce and register allotment results, and manage requests relating to rights under 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.

“**IPO Reference Data**” includes information about the Issuer, the listing, the offering, the names of the Receiving Banks, the listing documents, and transaction costs, but does not include any Personal Data. HKEX advises that any non-confidential IPO Reference Data which is provided to HKEX by a Sponsor User shall be made available for viewing by other FINI Users connected with the same listing application.

We will revise this Notice from time to time to reflect relevant developments to FINI or changes in the applicable laws and regulations. To the extent required under applicable data protection laws, we will notify you of the material changes and, where required, seek consent. You may check the most up-to-date Notice on the FINI website at https://www.hkex.com.hk/Services/Platform-Services/FINI?sc_lang=en.

Capitalised terms which are not defined in this Notice shall have the same meaning given to them under the Terms and Conditions of FINI (available at [link](#)).

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

If you are a **director or an authorised representative of an Issuer**, we shall collect and further process the following Personal Data about you to enable the relevant FINI Users to administer and facilitate the settlement of the Issuers' listing:

- Identity data including your current and former name, alias, e-signature, and position in the Issuer (e.g. non-executive director)

This also enables us to comply with regulatory requirements under the FINI regime and other applicable laws.

If you are an **investor who participates in a Hong Kong Public Offer**, we shall collect and further process the following Personal Data about you (or, if you are an authorised representative of a corporate investor, about your beneficial owners) when you submit an Application for Hong Kong Public Offer Shares through your appointed intermediary (e.g. a broker or a bank). This enables us to facilitate public offer share allotment including results and placee lists, and comply with regulatory requirements under the FINI regime and other applicable laws:

- Identity data including your full name, client category, government issued identification document number (and document type, name of issuing authority and issuing jurisdiction of the document), and/or (where applicable) Broker-to-Client Assigned Number (BCAN)

If you are an **investor who participates in an International Offer**, we shall collect and process (solely on behalf of The Stock Exchange of Hong Kong Limited (“**SEHK**”) or the Securities and Futures Commission) the following Personal Data about you (or, if you are an authorised representative of a corporate investor, about your beneficial owners) when you submit an application for shares through your appointed intermediary. This enables us to share such Personal Data with SEHK or the Securities and Futures Commission, which shall facilitate share allotment including results and placee lists, and comply with regulatory requirements under the FINI regime and other applicable laws:

- Identity data including full name, client category, and/or government issued identification document number (and document type, name of issuing authority and issuing jurisdiction of the document);
- Contact data including your phone number, residential address and email address.

If you are an **investor located in Mainland China**, we shall only collect and process such Personal Data where we have your consent in accordance with applicable data privacy and protection laws. You need to carefully consider whether your Sensitive Personal Data should be disclosed to us. It is necessary for you to provide us with your **government issued identification document, residential address and financial transaction data**, so that we can provide certain services to you. If you do not provide us with your consent, we may not be able to provide these services to you.

If you are an **investor located in the UK or EU**, we shall only collect and process such Personal Data if we have a legitimate interest or a legal or regulatory obligation to do so under applicable data privacy and data protection laws.

If you are a **Delegated Administrator or another authorized signatory / representative of a Sponsor User**, we shall collect and further process the following Personal Data:

- Identity data including your name, e-signature, and job title/position;
- Contact data including your phone number and email address;
- Technical data including any individual log-in user name and password when used to access FINI.

This enables us to process your registration for the FINI service and administer accounts of FINI Users and accompanying access rights to FINI on a day-to-day basis, as well as facilitate the settlement process of the Issuer's New Listing.

If you are a **Delegated Administrator or other authorized signatory / representative of an Intermediary User**, we shall collect and further process the following Personal Data:

- Identity data including your name, e-signature, and job title/position;
- Contact data including your phone number and email address;
- Technical data including any individual log-in user name and password when used to access FINI.

This enables us to process your registration for the FINI service and administer accounts of FINI Users and accompanying access rights to FINI on a day-to-day basis, as well as facilitate the settlement process of the Issuer's New Listing.

If you are a **Delegated Administrator or other authorized signatory / representative of a Share Registrar User**, we shall collect and further process the following Personal Data about you:

- Identity data including your name, e-signature, and job title/position when information of your clients are submitted;
- Contact data including your phone number and email address when information of your clients are submitted;
- Technical data including any individual log-in user name and password when used to access FINI.

This enables us to process your registration for the FINI service and administer accounts of FINI Users and accompanying access rights to FINI on a day-to-day basis, as well as facilitate the settlement process of the Issuer's New Listing.

If you are a **Delegated Administrator or other authorized signatory / representative of a Bank User**, we shall collect and further process the following Personal Data about you:

- Identity data including your name, e-signature, and job title/position when information of your clients are submitted;
- Contact data including your phone number and email address when information of your clients are submitted;

- Technical data including any individual log-in user name and password when used to access FINI.

This enables us to process your registration for the FINI service and administer accounts of FINI Users and accompanying access rights to FINI on a day-to-day basis, as well as facilitate the settlement process of the Issuer's New Listing.

If you are a **Delegated Administrator or other authorized signatory / representative of a Legal User**, we shall collect and further process the following Personal Data about you:

- Identity data including your name, e-signature, and job title/position information of your clients are submitted;
- Contact data including your phone number and email address when information of your clients are submitted;
- Technical data including any individual log-in user name and password when used to access FINI.

This enables us to process your registration for the FINI service and administer accounts of FINI Users and accompanying access rights to FINI on a day-to-day basis, as well as facilitate the settlement process of the Issuer's New Listing.

For **other authorized representatives of the Issuer** including accountant, auditor, independent advisor, internal control consultant, industry consultant, competent person (where applicable), and qualified valuer (where applicable), we shall collect and further process the following Personal Data about you:

- Identity data including your name and position when information of your clients are submitted;
- Contact data including your phone number and email address when information of your clients are submitted.

In respect of all Data Subjects listed above, we may also use Personal Data to undertake necessary market rehearsals or testing relating to the implementation, launch and ongoing operation of FINI.

In summary, for Data Subjects in Mainland China:

- To verify your identity, we shall process your name, alias, nationality, **government issued identification document number**, BCAN (where applicable), date of birth, and signature
- To identify duplications, we shall process your name and **government issued identification document number and/or BCAN** (where applicable)
- To issue correspondence to the relevant FINI Users, we shall process your phone number, business address, and email address
- To conduct monitoring in compliance with applicable laws and internal audit requirements, we may process your name and/or alias, **residential address**, and **government issued identification document number and/or BCAN**
- To review and announce allotment results and placee lists, we shall process your name, **government issued identification document number**, and **financial data**.

In summary, for Data Subjects who are California residents:

To the extent the California Privacy Rights Act applies, 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, and passport number*.	Collected directly from you	For verifying your identity, communicating with you, processing application forms, monitoring compliance with laws administered by HKEX, and meeting our general legal obligations.
Information about you including your name, signature, address, telephone number, passport number*, securities account number.	Collected directly from you or third parties.	For verifying your identity, communicating with you, processing application forms, monitoring compliance with laws administered by HKEX, and meeting our general legal obligations.

Personal Data marked with an * indicates Sensitive Personal Data.

Sensitive Personal Data

Some Personal Data is classified as “**Sensitive Personal Data**” under applicable data protection laws. If we are required to process Sensitive Personal Data, we will only do so in accordance with applicable law.

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

UK and EU	We may collect and further process racial and ethnic origin from government issued identification documents, which are collected directly from you or where disclosed on documents obtained from third parties.
Mainland China	<p>We may collect and further process:</p> <ul style="list-style-type: none"> ▪ (For FINI Users) individual log-in user name and passwords, in order for you to access FINI, to process your registration for FINI service, to administer accounts of FINI Users and accompanying access rights to FINI on a day-to-day basis, as well as to facilitate the settlement process of the Issuer's New Listing; ▪ Government issued identification document number to enable us to verify your identity, comply with regulatory requirements under the FINI regime or other applicable laws, and process your Data Subject Requests; ▪ (For certain investors) residential address to facilitate placement of shares, comply with regulatory requirements under the FINI regime or other applicable laws, and process your Data Subject Requests; and ▪ Financial transactions data (i.e. subscription allotment), to comply with regulatory requirements under the FINI regime or other applicable laws. <p>We shall only process such Sensitive Personal Data where we have your separate consent.</p>
California	<p>We may collect and further process passport information to verify your identity, comply with regulatory requirements under the FINI regime or other applicable laws, and process your Data Subject Requests.</p> <p>This information is collected directly from you or where disclosed on documents obtained from third parties. We do not use or disclose Sensitive Personal Data we collect for purposes other than those generally permitted under California law.</p>

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 to operate our business so long as it does not materially and adversely impact your interests, rights, and freedoms.

Legal Basis	Purpose
Public Interest	<ul style="list-style-type: none"> ▪ Identity and financial data to conduct regulatory compliance monitoring of Issuers, their officers and their relevant advisors
Legitimate Interests	<ul style="list-style-type: none"> ▪ Contact and technical data to set up and administer your account and your use of FINI ▪ Identity and contact data to process regulatory submissions from the Issuer with which you are connected in order for HKEX to provide the services subscribed ▪ Contact data to respond to maintain our list of contacts and respond to enquiries and complaints ▪ Technical data to maintain the security and integrity of our premises, infrastructure and systems ▪ Identity, contact, and technical data to test and improve the effectiveness of the FINI platform and to monitor metrics ▪ Identity, contact, and technical data to administer our relationship with our third-party providers

	<ul style="list-style-type: none"> Identity, contact, and technical data where related to subscriptions to conduct post-IPO research and analytics, on matters such as supporting IPO management decision-making and analytics, post-listing regulatory enquiries, and understanding the geographical distribution of subscribers.
Contract	<ul style="list-style-type: none"> Contact and technical data to set up and administer your account and your use of FINI Identity and contact data to process the listing application from the Issuer Company with which you are connected
Consent	<p>Separate consent</p> <ul style="list-style-type: none"> In the case of Data Subjects in Mainland China, we may require separate consent for the processing of Sensitive Personal Data or sharing of Personal Data with a third party, public disclosure, or cross-border transfer <p>Your indication of consent to the Notice shall not entitle us to collect and process all Personal Data listed in the Notice above. We shall only process those Personal Data which are necessary to perform and carry out our relevant functions or purposes.</p>
Legal or Regulatory Obligations	<ul style="list-style-type: none"> Discharge the general functions of HKEX and any company of which HKEX is the recognised exchange controller 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

We do not intend to process Personal Data collected under this Notice to send direct marketing, promotional and informational content relating to our financial products and services.

Minors' Personal Data

As FINI is not aimed at children, we do not process any minors' Personal Data for FINI.

Do we disclose Personal Data to third parties?

HKEX discloses Personal Data to third party organisations that provide a variety of services in connection with the operation of FINI from time to time during the operation of FINI. These third party Personal Data recipients and specific transfer purposes are set out below:

- Affiliates of Hong Kong Exchanges and Clearing Limited (including the SEHK Listing Division) to assist with the discharging of their respective obligations under FINI and statutory and regulatory functions, and to enable these entities to maintain other platforms which also process Personal Data under FINI for their relevant functions or purposes. These platforms may be subject to other privacy notices, including but not limited to the HKEX Website Privacy Notice ([link](#))
- Our vendor that generates and operates our registration e-forms to assist with the collection of Personal Data and other information that are required for registering FINI Users to the FINI platform for the first time, and providing FINI-related services on an ongoing basis
- Our vendor that assists with the transfer of the FINI registration records (containing Personal Data and other information that are required for registering FINI Users to the FINI platform, facilitating their ongoing access, and providing FINI-related services) for e-signature and storage purposes
- Our vendor that enables e-signatures to be made by authorised representatives of FINI Users for the purposes of, and on the documentation required for, first-time registration to the FINI platform
- Our vendor that provides backup storage solutions
- Our vendor that provides authentication services in respect of FINI User credentials
- Our vendor that provides cloud hosting and related services
- Any individual or entity upon their request where acting on your behalf according to your authorisation
- Share Registrars for registration of your allotment

- Our contractors/vendors who provide telecommunications, IT security, or other technical assistance
- Our professional service providers to provide us with legal, tax, and auditing services

HKEX shall also disclose and transfer your Personal Data to our regulators (such as the SFC) so that they may perform their statutory functions. Furthermore, to fulfil our legal and regulatory obligations (e.g. to discharge our statutory functions, to comply with court order, subpoena or other legal process), we may also share your Personal Data with courts, regulatory authorities, government and law enforcement agencies, and other public authorities. In the majority of these cases, HKEX is permitted to share this Personal Data without the consent of the Data Subject. However, where required, we shall ensure that adequate consent is obtained in accordance with 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 under applicable laws to take additional measures prior to giving effect to such transfers. In such case, HKEX shall endeavour to take such additional measures as required under data protection laws (e.g. carrying out privacy impact assessments prior to the transfer).

Where we are jointly processing your Personal Data with a third party data controller, we shall ensure that our responsibilities in processing your Personal Data are clearly and distinctively defined.

Do we transfer Personal Data to other destinations?

HKEX is Hong Kong based and therefore, any Personal Data that is collected or submitted to HKEX, shall be transferred to and processed in Hong Kong. Where HKEX processes Personal Data outside of Hong Kong, reasonable endeavours shall be applied to ensure that the laws and regulations of the destination jurisdiction shall offer the same or comparable level of protection for Personal Data.

Where the laws and regulations of the other jurisdiction do not offer the same or comparable level of protection for the Personal Data, then we shall ensure appropriate safeguards are in place at the time of the transfer by implementing standard contractual clauses (or such other data transfer mechanism required by law and/or approved by the relevant regulatory authorities). Where required under applicable data protection laws, we shall also carry out additional measures (e.g. conduct a privacy impact assessment) prior to the transfer of the data to ensure that it is carried out in accordance with applicable laws.

Further details on the processing locations, our measures for safeguarding international transfers (including adequacy decisions), identity of third party data controllers or processors and (where applicable) the legal bases for the transfer of Personal Data to outside the jurisdiction where Personal Data is collected may be obtained from us upon request (Please see "Contact Us" section below).

How long do we keep the Personal Data?

Personal Data is retained in accordance with our legal obligations and our internal policies including our Group Record Retention Policy.

Your Personal Data will be retained by us for as long as is necessary to fulfil the purposes required for processing under the FINI regime. 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 your 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 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

If you are located in Mainland China, we usually retain your Personal Data for not more than 3 years from the last activity or interaction with us (unless we are required to keep your Personal Data for a longer period if required under applicable laws or our group retention policy). However, some of your Personal Data may be kept indefinitely to ensure that it will not be re-used by any other person. If you require details of our Personal Data retention period, please contact us (at our contact information 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 and take reasonable measures to securely destroy the relevant Personal Data (although copies may be retained as necessary for archival purposes, for use in any actual or potential dispute, or for compliance with applicable laws).

How do we keep your Personal Data secure?

HKEX takes 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.

We have applied physical, technical and administrative safeguards to the infrastructure and systems under the control of HKEX to help prevent unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, and to maintain the general security of the data, which includes:

- access to FINI taking place through a centralised authentication service
- controls to ensure that only relevant information is accessible to authorised, pre-registered and successfully authenticated users
- Web interface access being subject to two-factor authentication
- API access being subject to JSON Web Token authentication, following OAuth protocol.

However, HKEX cannot ensure the security of information during its transmission to HKEX when it is being transmitted via means not under our control. HKEX will never ask for the password you use to access the FINI platform. You have an obligation to keep your log-in user name and password and any additional personal data secure.

If we provide links to the websites of independent third parties, we encourage you to read the privacy policies made available on these other websites as we cannot control nor are we responsible for how they handle your Personal Data.

Rights over the Personal Data

You are afforded the following data subjects rights, to the extent available under applicable data protection law:

- confirm whether we hold your Personal Data and the type of Personal Data we hold
- access a copy of your Personal Data
- delete your Personal Data
- correct or supplement your Personal Data where it is found to be inaccurate
- restrict the processing performed on your Personal Data
- withdraw consent to the processing of your Personal Data in certain 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, you may also be provided with additional rights:

Mainland China	<ul style="list-style-type: none"> ▪ Explanation on the rules of processing the Personal Data ▪ Conferral of Data Subject rights to a surviving next-of-kin ▪ Transfer of your Personal Data to your designated party ▪ Cancellation of any platform account provided by us
UK and EU	<ul style="list-style-type: none"> ▪ Right to object to processing.

Where these rights apply, we shall use reasonable endeavours to fulfil the request or provide an explanation.

We endeavour to respond 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. Please note that we may seek confirmation of identity or clarification in order to fulfil the request. We may also charge a reasonable fee for the cost of processing the request as permitted under the applicable law.

If you would like to exercise your Data Subject rights, please contact the HKEX Group Data Protection Office at the address below.

Contact Us

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

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

UK Representative:

Address: 10 Finsbury Square, London, EC2A 1AJ, United Kingdom

EU Representative:

Address: De Cuserstraat 91, 1081 CN Amsterdam, Postbus/PO Box 7902, 1008 AC Amsterdam, Netherlands hkex.eurpe@eversheds-sutherland.com

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 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: September 2023

Annex

This Notice relates to the privacy practices of the following HKEX group entities. For contact details of the following entities, please see "Contact Us" section above:

- Hong Kong Exchanges and Clearing Limited
- 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