

# Maples Group Client Privacy Notice

## Private Client Services (Hong Kong)

Version 1.0 (August 2022)

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### 1 What does this Privacy Notice do and does it apply to me?

- 1.1 Most countries have data protection laws that protect the privacy of individuals by regulating the way in which businesses handle personal information. Among other things, data protection laws require businesses that handle personal information to be open and transparent about why and how they handle personal information.
- 1.2 The purpose of this Privacy Notice is to inform you why and how the Maples Group ("**Maples**", "**we**", or "**us**") handles personal information about you in connection with the private trust services and other related fiduciary services tailored for private individuals ("**Private Client Services**") we provide through our Fiduciary Services Division, in accordance with the disclosure requirements that apply in the mainland China under the Personal Information Protection Law ("**PIPL**") of the People's Republic of China ("**China**").
- 1.3 This Privacy Notice will apply to you only if you are a resident of mainland China and you fall into one of the following categories of individuals:
  - (a) **Private Clients.** Individuals who directly engage us to receive Private Client Services from our Fiduciary Services Division in connection with their own private affairs;
  - (b) **Service Beneficiaries.** Individuals who are not Private Clients but nevertheless benefit, directly or indirectly, from the Private Client Services we provide to our Private Clients (e.g. those to whom assets are distributed by the trusts/foundations we set up or administer on behalf of our Private Clients); or
  - (c) **Other Relevant Persons.** Individuals who are neither Private Clients nor Service Beneficiaries, but are nevertheless relevant to the Private Client Services we provide to Private Clients (e.g. those who introduce Private Clients to us, those who act as professional advisors to our Private Clients, those who act as protectors/enforcers/supervisors of trusts/foundations set up by our Private Clients, those who donate assets to trusts/foundations set up by our Private Clients).
- 1.4 Nothing in this Privacy Notice creates any new relationship between you and us, or alters any existing relationship between you and us. Nothing in this Privacy Notice affects any right you have under any applicable law, including PIPL or any other data protection law that applies to you.

### 2 Who is responsible for the proper handling of my personal information?

- 2.1 The particular entity within the Maples Group which is legally responsible for the proper handling of your personal information (a 'Personal Information Processor' for the purposes of PIPL) in connection with the Private Client Services we provide through our Fiduciary Services Division is:

**Maples Fiduciary Services (Hong Kong) Limited**

2701, 27<sup>th</sup> Floor, Central Plaza, 18 Harbour Road, Wanchai, Hong Kong

### 3 What sort of personal information about me does Maples collect?

- 3.1 The types of personal information which we collect will vary depending on a number of factors, including your personal circumstances, the nature of your relationship with us, and the nature of the specific services we are asked to perform as part of Private Client Services.
- 3.2 The personal information we obtain can be grouped into the following categories:

- (a) **Contact Details.** Your contact details such as title, name, postal address, email address, and phone number.
- (b) **KYC Records.** Information about you which we are obliged to check for legal or regulatory reasons, such as your date of birth, country of residence, nationality, tax status, source of your wealth, any ownership interest in any entity or asset you hold, any political/military/judicial position you hold, any criminal record you have, whether or not any official economic sanction is enacted against you, and other like information concerning your identity and background.
- (c) **Service Records.** Information about you which we obtain in order to provide our services. Depending on the circumstances and the nature of your relationship with us, such information may include, without limitation, your assets and liabilities, your bank account details, your personal circumstances, instructions you give to us in your capacity as a Private Client and your underlying intentions, your relationship with our Private Clients, actions we take towards you based on instructions we receive from our Private Clients, and so on.

3.3 The aforementioned categories of personal information —KYC Records and Service Records in particular— will often include what is defined as ‘Sensitive Personal Information’ under PIPL, such as information relating to your finances and other like information which, if mishandled, can potentially harm your safety or the safety of your assets.

3.4 However, please note that the nature of our Private Client Services —which centres on the establishment and administration of trusts/foundations which hold financial assets on behalf of our Private Clients— means that the handling of such Sensitive Personal Information is often unavoidable.

3.5 We will collect your personal information only where we are legally permitted to do so, and only to the extent it is appropriate and necessary for one or more of the purposes described in Section 4 below.

#### **4 Why does Maples collect my personal information?**

4.1 We handle your personal information for one or more of the following purposes:

- (a) **Service Delivery.** To facilitate the provision of our Private Client Services, for example to act as trustees, directors, protectors, enforcers, administrators, registered office provider, or liquidators of trusts/foundations set up by our Private Clients. A general description of our Private Client Services is available online on our website at <https://maples.com/en/services/fiduciary-services/private-client-services>.
- (b) **Service Development.** To improve our Private Client Services and devise new services which form part of our Private Client Services.
- (c) **Client Relationship Management.** To manage, maintain, and develop our relationship with our Private Clients.
- (d) **Business Administration.** To facilitate the effective management and administration of our business, including in relation to matters such as business planning, budgeting, and forecasting, as well as enforcement of our terms and conditions of service and collection of our fees.
- (e) **Legal and Regulatory Compliance.** To ensure that we (and the trusts/foundations we service) comply with all relevant legal and regulatory requirements, including, without limitation, legal requirements relating to money laundering, bribery and corruption, tax evasion, sanctions / embargoes, and export control.

**Important Note:** If you are a Private Client, we will use your personal information to conduct various checks to ensure that we comply with all applicable legal and regulatory requirements, before we formally accept you as a Private Client and from time to time after you are accepted as our Private Client (e.g. to check if you are included in official list published by the authorities which lists persons with whom we are by law not allowed to do business, or if you are a politically exposed person in respect of whom we are required to undertake enhanced due diligence, and so on). If you are a Service Beneficiary, we may use your personal information to conduct such checks, for example before any payment is made to you by a trust/foundation which is serviced by us.

## **5 How does Maples obtain my personal information?**

- 5.1 We endeavour to collect your personal information directly from you wherever possible. However, the nature of the services we perform and the context in which we handle your personal information can result in us collecting your personal information indirectly from third party sources.
- 5.2 Additionally, there may be circumstances where we are required to seek your personal information from independent sources (for example where we need to use your personal information to comply with legal requirement to validate your identity and background).
- 5.3 Sources from which we may obtain your personal information can be described as follows:
- (a) Those who have referred you to us, such as your business contact.
  - (b) Your spouse, partner, parent, or another member of your family who is our Private Client.
  - (c) Your lawyer, accountant, tax advisor, wealth manager, and other such advisors who provide your personal information to us on your behalf.
  - (d) Publicly accessible websites, registers, and databases, including official registers of companies and businesses, database of journals and news articles, and social media such as LinkedIn.
  - (e) Providers of background check and business risk screening services, such as operators of fraud and financial crime databases, and operators of sanctions / embargoes databases.

## **6 Does Maples use my personal information for marketing purposes?**

- 6.1 We will not use your personal information for marketing purposes, unless you voluntarily subscribe to the Maples Group's mailing list (e.g. by registering on the Maples Group's website), in which case we will use your personal information to send you email updates on topics of your choosing or topics which may be of interest to you.
- 6.2 If you wish to stop receiving email updates from us, you can use the 'unsubscribe', 'opt out', or 'update your marketing preference' link we include within our email updates. If for whatever reason such links are not functioning or missing, or if you feel that we have otherwise failed to respect your marketing preference, please alert your contact person within Maples, or alternatively, contact us using the details provided in paragraph 14.2.

## **7 Does Maples share my personal information with others?**

- 7.1 We will share your personal information with others only if and to the extent it is appropriate and necessary to do so for one or more of the purposes outlined in Section 4. The types of personal information that we may share with others are described in Section 3. Whenever we

share your personal information, whether internally or externally, we will ensure that such sharing is kept to the minimum necessary.

7.2 The extent to which we share your personal information will vary depending on your circumstances and relationship with us, but your personal information will typically be shared with the following categories of recipients:

(a) Affiliates of the Maples Group which provide services that form essential parts of the Private Client Services we provide to our Private Clients. All of the recipients in this category are Independent Processors (see paragraph 7.4 below).

(i) **MaplesFS BVI Limited**  
Ritter House, PO Box 173, Road Town, Tortola VG1110, British Virgin Islands

This entity will typically receive your personal information if it needs to handle your personal information in order to act as a trustee/director of a trust/foundation which is established in the British Virgin Islands by you or one of our Private Clients.

(ii) **Maples Trustee Services (Cayman) Limited**  
PO Box 1093, Boundary Hall, Cricket Square, Grand Cayman, KY1-1102, Cayman Islands

This entity will typically receive your personal information if it needs to handle your personal information in order to act as a trustee/director of a trust/foundation which is established in the Cayman Islands by you or one of our Private Clients.

(iii) **Maples Corporate Services (BVI) Limited**  
Ritter House, PO Box 173, Road Town, Tortola VG1110, British Virgin Islands

This entity will typically receive your personal information if it needs to handle your personal information in order to provide registered office service to a trust/foundation which is established in the British Virgin Islands by you or one of our Private Clients.

(iv) **Maples Corporate Services Limited**  
Ugland House, South Church Street, PO Box 309, Grand Cayman KY1-1104, Cayman Islands

This entity will typically receive your personal information if it needs to handle your personal information in order to provide registered office service to a trust/foundation which is established in the Cayman Islands by you or one of our Private Clients.

(v) **Maples Liquidation Services Limited**  
Boundary Hall, PO Box 1093, Cricket Square, Grand Cayman KY1-1102, Cayman Islands

This entity will typically receive your personal information if it needs to handle your personal information in order to act as a liquidator of a trust/foundation which is established in the British Virgin Islands or the Cayman Islands by you or one of our Private Clients.

(vi) **Maples and Calder (UK entity)**  
11th Floor, 200 Aldersgate Street, London, EC1A 4HD, UK

This entity will typically receive your personal information if it needs to handle your personal information in order to provide legal services to a trust/foundation which is established in the British Virgin Islands or the Cayman Islands by you or one of our Private Clients.

- (vii) **Maples and Calder (BVI entity)**  
Ritter House, PO Box 173, Road Town, Tortola VG1110, British Virgin Islands

This entity will typically receive your personal information if it needs to handle your personal information in order to provide legal services to a trust/foundation which is established in the British Virgin Islands by you or one of our Private Clients.

- (viii) **Maples and Calder (Cayman) LLP**  
Ugland House, South Church Street, PO Box 309, Grand Cayman KY1-1104, Cayman Islands

This entity will typically receive your personal information if it needs to handle your personal information in order to provide legal services to a trust/foundation which is established in the Cayman Islands by you or one of our Private Clients.

- (b) Affiliates of the Maples Group which become involved in reviewing and approving the engagement of our Private Clients. All of the recipients in this category are Independent Processors (see paragraph 7.4 below).

These entities will receive your personal information —through the senior executives they employ— for the purposes of our business acceptance process, but only if and to the extent necessary to decide whether or not we are in a position to provide our services to you or one of our Private Clients.

- (i) **Maples and Calder (Cayman) LLP**  
Ugland House, South Church Street, PO Box 309, Grand Cayman KY1-1104, Cayman Islands
- (ii) **MaplesFS Service Company Limited**  
Ugland House, South Church Street, PO Box 309, Grand Cayman KY1-1104, Cayman Islands
- (iii) **Maples and Calder (UK entity)**  
11th Floor, 200 Aldersgate Street, London, EC1A 4HD, UK

- (c) Affiliates of the Maples Group which perform the Compliance function for the Maples Group to ensure that the engagements of our Private Clients are compliant with all applicable laws and regulations. All of the recipients in this category are Independent Processors (see paragraph 7.4 below).

This category encompasses all entities which might potentially gain access to your personal information —through the compliance officers, compliance analysts, etc. they employ— in performing compliance oversight, but it does not mean that all of these entities always have access to your personal information; these entities will access your personal information in order to perform compliance oversight only in limited circumstances where this is actually necessary (e.g. to conduct the types of checks described in the box at paragraph 4.1(e) above in relation to you).

- (i) **Maples and Calder (BVI entity)**  
Ritter House, PO Box 173, Road Town, Tortola VG1110, British Virgin Islands

- (ii) **Maples Fund Services (Canada) Inc.**  
2000 McGill College Avenue, Suite 2050, Montreal, Quebec, H3A 3H3,  
Canada
  - (iii) **Maples Corporate Services Limited**  
Ugland House, South Church Street, PO Box 309, Grand Cayman KY1-1104,  
Cayman Islands
  - (iv) **MaplesFS Service Company Limited**  
Ugland House, South Church Street, PO Box 309, Grand Cayman KY1-1104,  
Cayman Islands
  - (v) **Maples and Calder (Hong Kong) LLP**  
2701, 27th Floor, Central Plaza, 18 Harbour Road, Wanchai, Hong Kong
  - (vi) **Maples and Calder (Singapore) LLP**  
1 Raffles Place, #36-01, One Raffles Place, 048616, Singapore
  - (vii) **Maples and Calder Services (Europe) Ltd**  
14 King Street, Leeds, West Yorkshire, LS1 2HL, UK
  - (viii) **Maples and Calder (Dubai) LLP**  
Level 14, Burj Daman, Dubai International Financial Centre, PO Box 119980,  
Dubai, UAE
- (d) Affiliates of the Maples Group which perform the IT function, accounts function, operations function, and other like support functions for the Maples Group and support our business operation in general. None of the recipients in this category are Independent Processors (see paragraph 7.4 below).

This category encompasses all entities which might potentially gain access to your personal information —through the support staff and administrative staff they employ— in supporting our business operation, but it does not mean that all of these entities always have access to your personal information; these entities will access your personal information in order to provide the relevant support only in limited circumstances where this is actually necessary (e.g. to investigate and remedy technical issues affecting a database which contains your personal information, or to generate and send you the invoice for the services we provide to you).

- (e) Unaffiliated service providers which we have engaged to provide the data centres and cloud platform that host the IT infrastructure we use to conduct our business. None of the recipients in this category are Independent Processors (see paragraph 7.4 below).

These service providers technically speaking have access to your personal information by virtue of hosting our IT infrastructure, but we have strict controls in place to prevent tampering with our hardware and data, so these service providers are highly unlikely to gain any meaningful access to your personal information.

7.3 In addition to the recipients described above, your personal information may also be shared with the following categories of recipients, if and to the extent circumstances necessitating such sharing arises. All of the recipients in the following categories are Independent Processors (see paragraph 7.4 below).

- (a) Maples Group entities which perform the Risk, Audit, and Information Security functions for the Maples Group.

These entities may receive your personal information —through the auditors, risk managers, information security analysts, etc. they employ— if they need to handle your personal information in order to audit our business (e.g. to validate that the relevant policies and procedures are being followed when we provide Private Client Services) or to address issues which put our business or our Private Clients at risk (e.g. to investigate and resolve information security incidents).

- (i) **Maples Fund Services (Canada) Inc.**  
2000 McGill College Avenue, Suite 2050, Montreal, Quebec, H3A 3H3,  
Canada
  - (ii) **Maples and Calder (Cayman) LLP**  
Ugland House, South Church Street, PO Box 309, Grand Cayman KY1-1104,  
Cayman Islands
  - (iii) **MaplesFS Service Company Limited**  
Ugland House, South Church Street, PO Box 309, Grand Cayman KY1-1104,  
Cayman Islands
  - (iv) **Maples and Calder (Ireland) LLP**  
75 St. Stephen's Green, Dublin 2, D02 PR50, Ireland
  - (v) **Maples Fiduciary Services (Ireland) Limited**  
32 Molesworth Street, Dublin 2, D02 Y512, Ireland
  - (vi) **Maples Fund Services (Ireland) Limited**  
32 Molesworth Street, Dublin 2, D02 Y512, Ireland
  - (vii) **Maples and Calder (Jersey) LLP**  
2<sup>nd</sup> Floor, Sir Walter Raleigh House, 48-50 Esplanade, St. Helier, JE2 3QB,  
Jersey
  - (viii) **Maples Fiduciary Services (Jersey) Limited**  
3<sup>rd</sup> Floor, Sir Walter Raleigh House, 48-50 Esplanade, St. Helier, JE2 3QB,  
Jersey
  - (ix) **Maples and Calder (UK entity)**  
11th Floor, 200 Aldersgate Street, London, EC1A 4HD, UK
  - (x) **Maples and Calder Services Europe Limited**  
14 King Street, Leeds, West Yorkshire, LS1 2HL, UK
  - (xi) **Maples Fiduciary Services (UK) Limited**  
11th Floor, 200 Aldersgate Street, London, EC1A 4HD, UK
  - (xii) **MaplesFS Fund Services (MA) Inc.**  
470 Atlantic Avenue, Suite 306, Boston, MA 02210, USA
- (b) Maples Group entities which perform the Legal function for the Maples Group.

These entities may receive your personal information —through the in-house lawyers they employ— if they need to handle your personal information in order to provide legal advice to us in connection with our Private Client Services (e.g. to negotiate/draft agreements to be put in place between us and our Private Clients or to advise on disputes between us and our Private Clients).

- (i) **MaplesFS Service Company Limited**  
Ugland House, South Church Street, PO Box 309, Grand Cayman KY1-1104, Cayman Islands
  - (ii) **Maples Fiduciary Services (Ireland) Limited**  
32 Molesworth Street, Dublin 2, D02 Y512, Ireland
  - (iii) **Maples and Calder (UK entity)**  
11th Floor, 200 Aldersgate Street, London, EC1A 4HD, UK
  - (iv) **MaplesFS Fund Services (MA) Inc.**  
470 Atlantic Avenue, Suite 306, Boston, MA 02210, USA
- (c) Maples Group entities which provide management oversight in relation to the services we provide through our Fiduciary Services Division in general, including our Private Client Services.

These entities may receive your personal information if they need to handle your personal information —through the senior executives they employ— in order to exercise management oversight in relation to our Private Client Services (e.g. to provide management direction in relation to major business initiatives and operational issues which affect our Private Clients).

- (i) **Maples Trustee Services (Bermuda) Limited**  
Cumberland House, 7th Floor, 1 Victoria Street, Hamilton HM11, Bermuda
- (ii) **MaplesFS Holdings Limited**  
Queensgate House, PO Box 1093, Grand Cayman, KY1-1102, Cayman Islands
- (iii) **MaplesFS Service Company Limited**  
Ugland House, South Church Street, PO Box 309, Grand Cayman KY1-1104, Cayman Islands
- (iv) **Maples Fiduciary Services (Ireland) Limited**  
32 Molesworth Street, Dublin 2, D02 Y512, Ireland
- (v) **Maples Fiduciary Services (Jersey) Limited**  
3rd Floor, Sir Walter Raleigh House, 48-50 Esplanade, St. Helier, JE2 3QB, Jersey
- (vi) **MaplesFS (Luxembourg) SA**  
12E, rue Guillaume Kroll, L-1882, Luxembourg
- (vii) **Maples Fiduciary Services (Netherlands) BV**  
Strawinskylaan 1209, WTC Tower A, 12th Floor, 1077XX Amsterdam, Netherlands
- (viii) **Maples Fiduciary Services (Singapore) Limited**  
1 Raffles Place, #36-01, One Raffles Place, 048616, Singapore
- (ix) **Maples Fund Services (Middle East) Limited**  
Level 14, Burj Daman, Dubai International Financial Centre, PO Box 119980, Dubai, UAE
- (x) **Maples Fiduciary Services (UK) Limited**  
11th Floor, 200 Aldersgate Street, London, EC1A 4HD, UK



- (xi) **Maples Fiduciary Services (Delaware) Inc.**  
4001 Kennett Pike, Suite 302, Wilmington, DE 19807, USA
- (d) Third party financial institutions who are party to transactions that involve the trusts/foundations that are set up by our Private Clients, if it is necessary for us to share your personal information with such institutions in order to effect such transactions. For example, if assets held in a trust/foundation set up by our Private Client needs to be distributed to you, we will have to share your personal information with the bank where the account of the trust/foundation is held.
- (e) Third party advisors (other than the law firms identified at paragraphs 7.2(a)(vi) to 7.2(a)(viii) above) who provide legal advice or tax advice to the trust/foundation which we service, if it is necessary for us to share your personal information with such advisors in order to service the relevant trust/foundation. Such advisors are typically appointed by our Private Clients, but can also be appointed by us.
- (f) Government departments and agencies, police, regulators, courts, tribunals, and other like authorities with whom we are legally obliged to share your personal information. The identity of such third parties vary depending on a number of factors, including your personal circumstances, the nature of your relationship with us, and the nature of the specific services we are asked to perform as part of Private Client Services, but can potentially include, as a minimum, any combination of the following:

**Important Note:** Please note that where we share your personal information with the authorities, we may, depending on the circumstances, be forbidden from advising you of the fact that your personal information was disclosed to or requested by the authorities (e.g. when doing so is illegal or might prejudice an on-going investigation).

- (i) **British Virgin Islands Financial Services Commission ("BVI-FSC")**  
18 Pasa Estate Road, Road Town, Tortola VG1110, British Virgin Islands
- (ii) **Cayman Islands Monetary Authority ("CIMA")**  
SIX, Cricket Square, PO Box 10052, Grand Cayman KY1-1001, Cayman Islands

If we handle your personal information in providing services to a trust/foundation established by our Private Clients in the British Virgin Islands or the Cayman Islands (e.g. by acting as a trustee, registered agent, administrator, registered office provider, or liquidator), we may be required to share your personal information with BVI-FSC/CIMA under the laws and regulations enforced by BVI-FSC/CIMA.

- (iii) **International Tax Authority ("ITA")**  
Peace House, Pickering Drive, Road Town, Tortola VG1110, British Virgin Islands
- (iv) **Department for International Tax Cooperation ("DITC")**  
Box 135, 133 Elgin Avenue, Grand Cayman KY1-9000, Cayman Islands

If we handle your personal information in opening, administering, or maintaining any financial account as part of the services we provide in the British Virgin Islands or the Cayman Islands (regardless of whether we do so directly or indirectly), we may be required to share your personal information with ITA/DITC under the laws and regulations enforced by ITA/DITC. If we do so, ITA/DITC may in turn share your personal information with their counterparts in other jurisdictions in which you are resident for tax purposes.

- (v) **Supreme Court (High Court)**  
PO Box 418, Road Town, Tortola VG1110, British Virgin Islands
- (vi) **Grand Court**  
PO Box 495, Grand Cayman KY1-1106, Cayman Islands

We may share your personal information with the courts of the British Virgin Islands or the Cayman Islands, if we become involved in official proceedings concerning a trust/foundation which is established there by you or one of our Private Clients (this can happen, for example, where procedures for the grant of probate is commenced), or if we are compelled to do so by orders or subpoenas issued by the courts. If we do so, your personal information may be shared with other third parties involved in such proceedings (e.g. opponents in contested proceedings and their lawyers).

7.4 Please note that all of the aforementioned recipients (with the exception of the category of recipients described in paragraphs 7.2(d) and 7.2(e) above, who only handle your personal information on our behalf in accordance with our instructions) can make their own decision as to why and how they handle your personal information (i.e. they act as "**Independent Processors**"), and whilst most of these recipients will generally speaking handle your personal information in a manner that is consistent with this Privacy Notice, we do not fully control how such recipients (in particular the category of recipients described in paragraphs 7.3(d), 7.3(e), and 7.3(f) above) may handle your personal information.

7.5 If you have any query or concern regarding the way in which we share your personal information, please reach out to your contact person within Maples in the first instance, or alternatively, contact us using the details provided in paragraph 14.2.

## **8 Does Maples transfer my personal information outside mainland China?**

8.1 **Maples Fiduciary Services (Hong Kong) Limited**, which acts as the primary interface between us and our Private Clients, is based in Hong Kong and much of its data is held in a data centre which is also based in Hong Kong. Therefore, if we handle your personal information, your personal information will as a minimum be handled in Hong Kong.

8.2 Additionally, the international nature of our business operation and the markets in which the we operate means that your personal information will often have to be transferred to at least some of the different categories of recipients described in Section 7, who could be located anywhere in the world, including, as a minimum, Bermuda, British Virgin Islands, Canada, Cayman Islands, Dubai, Ireland, Jersey, Luxembourg, Netherlands, Singapore, UK, and the USA.

8.3 Whenever we share your personal information with recipients who are located outside mainland China, we will take appropriate steps which are within our control to take to ensure that the sharing of your personal information takes place in accordance with any relevant legal restriction that applies to cross-border transfer of personal information.

## **9 Will my personal information be kept secure by Maples?**

9.1 We take information security very seriously and we use a broad range of tools and techniques to prevent and detect incidents that might adversely affect information we hold, such as unauthorised access or disclosure, and accidental change or loss, whether they are caused by external factors or internal factors.

9.2 The tools and techniques we use include technical measures such as firewalls, backup and disaster recovery systems, antimalware, and encryption, as well as other measures such as vetting of suppliers who are entrusted with our information, awareness training for our workforce, and the continuous evaluation and enhancement of our information security controls. We also conduct a broad range of monitoring over our IT and communication systems.

## **10 What would Maples do if a data breach happens?**

- 10.1 In the unlikely and unfortunate event your personal information under our control becomes compromised due to a breach of our security, we will act promptly to identify the cause and take the necessary steps to contain and mitigate the consequences of the breach. Where appropriate, we will also notify you of the breach in accordance with PIPL, and any other applicable law which requires us to notify you of the breach.

## **11 How long will Maples retain my personal information?**

- 11.1 The personal information about you which we collect will typically be retained for at least as long as your personal information continues to be relevant to the Private Client Services we provide, and once your personal information ceases to be relevant to the Private Client Services we provide, we will retain your personal information as part of our business records for the duration of the applicable retention period which will be determined by reference to any legal or regulatory record keeping requirement that applies to us.
- 11.2 For example, if you are a Private Client, we will retain your personal information for as long as you remain our Private Client and once you cease to be our Private Client, we will retain your personal information in accordance with the applicable legal retention requirements (e.g. under the anti-money laundering laws and regulations which apply to us, we will be compelled to retain your personal information which forms part of our due diligence record for at least 5 years following the termination of our business relationship with you).
- 11.3 In the absence of any specific legal or regulatory record-keeping requirement which applies, we may choose to retain your personal information for an appropriate period where we consider this to be necessary to protect ourselves from any legal claim or dispute that may arise in connection with the Private Client Services we have provided. If we do so, the retention period applied to your personal information will reflect the relevant limitation periods, which can potentially be as long as 12 years (e.g. if we acted as a trustee of a trust/foundation which was formed using an instrument executed as a deed).

## **12 Will this Privacy Notice change in the future?**

- 12.1 This Privacy Notice was last revised on **1 August 2022**. We may revise this Privacy Notice from time to time to reflect changes in law or changes in how we run our business, but where such revision becomes necessary in the future, we will announce the changes on our website at <https://maples.com/privacy> and bring them to your attention to the extent it is practicable to do so. For an explanation of historical changes made to this Privacy Notice, please refer to the change log set out in the last page of this Privacy Notice.

## **13 What rights do I have in respect of my personal information?**

- 13.1 Under PIPL, you have certain legal rights in respect of your personal information handled by us. These include the following:
- (a) The right to ask us to confirm whether or not we handle any personal information about you.
  - (b) The right to ask us to provide you with copies of your personal information we hold.
  - (c) The right to ask us to correct any inaccuracy or incompleteness in your personal information we hold.
  - (d) The right to ask us to delete your personal information we hold under specified circumstances, for example where we cease to provide the Private Client Services in connection with which we hold your personal information, or where our handling of your personal information is unlawful.

- (e) The right to ask us to explain any automated-decision making we carry out by using your personal information (including the rules and logics we apply), and to object to such automated-decision making where it has a significant impact on you.
- (f) The right to object to us using your personal information for direct marketing purposes.
- (g) The right to withdraw your consent, where we rely on your consent to handle your personal information.

**Important Note 1:** The rights you have in respect of your personal information are not absolute and are subject to a range of legal conditions and exemptions. If and to the extent a relevant legal condition or exemption applies, we reserve the right not to comply with your request.

**Important Note 2:** We may rely on your consent as the lawful basis for processing your personal information for certain purposes set out in Section 4 above. In particular, we rely on your consent in order to: (a) handle any of your personal information which constitutes 'Sensitive Personal Information' (see paragraphs 3.3 and 3.4 above); (b) share your personal information with recipients who are Independent Processors (paragraph 7.4 above); and (c) handle your personal information outside mainland China (see Section 8 above). If you do not provide your consent or if you withdraw any consent you have previously given in this regard, please note that we will in all likelihood be unable to provide (or continue to provide) our Private Client Services to you (or the relevant Private Client to whom you are connected), given that the handling of 'Sensitive Personal Information', sharing of your personal information with recipients who are Independent Processors, and handling of your personal information outside mainland China are all unavoidable and necessary aspects of our Private Client Services.

## 14 Who can I contact about my personal information?

- 14.1 If you would like to exercise any of the rights you have in respect of your personal information, or if you have any question or concern regarding the way in which we handle your personal information, then please reach out to your usual contact person within Maples in the first instance. If you are not sure who to contact, please write to:

Head of Private Client Services  
Maples Fiduciary Services (Hong Kong) Limited  
2701, 27<sup>th</sup> Floor, Central Plaza, 18 Harbour Road, Wanchai, Hong Kong

- 14.2 If you have a complaint regarding the way in which we handle your personal information, please contact our Group Data Protection Counsel in the first instance. You can do so by emailing your complaint to [privacy@maples.com](mailto:privacy@maples.com) or by writing to:

Group Data Protection Counsel  
Maples and Calder  
11th Floor, 200 Aldersgate Street, London, EC1A 4HD, UK

- 14.3 We will endeavour to respond satisfactorily to any request, query, or complaint you may have in respect of your personal information, but if you are dissatisfied with our response and wish to make a formal complaint, or if you simply wish to learn more about your rights under PIPL, you can contact the Cyberspace Administration of China.

Further information regarding the Cyberspace Administration of China (including its contact information) can be found online on its website at <https://www.cac.gov.cn/>.

## Change Log

Version	Date	Remark
1.0	2022-08-01	Original version prepared as part of PIPL remediation.