

Privacy policy

Vcan FinTech Limited (“**Vcan**” or “**We**”) prides itself on offering the highest levels of security, transparency and integrity when it comes to protecting our clients' interests.

This policy applies to information that the Vcan may collect about visitors to our website, companies and individuals who register for our services and continue to make use of our services and any other person who corresponds with us over the phone or in writing. It's purpose is to set out the policies and practices of the Vcan in respect of protecting personal privacy in accordance with applicable laws.

Our aim is to give you reassurance that any personal information will be used fairly and only for the purposes for which it was collected.

Please review this Privacy Policy prior to registering an account and providing us with your personal information. Client confidentiality is our main concern and through good practices we strive to ensure that:

- only information which is necessary for adherence to the regulations and/or improvement of our service is collected;
- personal information is collected fairly; and
- personal information is stored securely.

When Vcan collects, processes and stores personal information, Vcan will only do so in accordance with the Personal Data (Privacy) Ordinance (Chapter 486 of the Laws of Hong Kong) (the “**Privacy Ordinance**”).

If you have any further questions about data protection with Vcan, please do not hesitate to get in touch with our Data Protection Officer who can be contacted at legal@vcanfintech.com and we will do our best to alleviate any of your concerns.

How do we collect information about you?

We collect information about you when you visit our website, register for an account (whether online or by completing our paper based forms) or when you correspond with us over the phone, via email or in writing.

When you register for an account with us, we may collect, process, hold, store and use information including (but not limited to): your name, address, email address, telephone numbers, company information, date of birth and identity card or passport information. Once your account is fully set up and you begin to transact with us we will collect, process, hold, store and use financial and transactional information.

We also use cookies to improve your experience when visiting our website.

What do we use your information for?

The law says that personal information shall be obtained, used and disclosed fairly. We use your personal information to allow us to process your registration, process any transactions you may book through us and to maintain the accuracy of information on your account.

Registration and administration

We use your information to enable you to register with us. Once you have an account with us we will use your details to contact you and to reply to any queries or requests. We may use your information in the administration of your account, which includes us contacting you in order to update your account details (this assists us with keeping our records as up to date as possible) or in order to notify you of changes or improvements to our products or services that may affect our service to you.

Our products and services

We use your information in order to supply our products and services to you and to meet our contractual obligations to you. Additionally we may need to notify you of any changes relating to our products and services.

Prevention and detection of crime

We are subject to anti-money laundering and counter-terrorist financing regulations which may require us to undertake due diligence on our customers. This may include the use of electronic verification tools. As part of our verification requirements we may require copies of identification documents and proof of address. We may require additional documentation and information from time to time throughout the course of our business relationship with you to ensure we comply with our anti-money laundering and counter-terrorist financing obligations.

We may need to pass your information on to Governmental departments, regulatory bodies (including the Hong Kong Customs and Excise Department), Inland Revenue Department, the police/law enforcement agencies or to a court of law. This would be done, for example, to assist in the prevention of a crime (money laundering/fraud), to meet legal requirements or for other lawful purposes.

Direct Marketing

We may use your information to keep you up to date concerning our products and services.

You will be able to update your marketing preferences at any time by logging into your Vcan account or by following the unsubscribe link contained in the marketing communication.

Monitoring

We record all our telephone calls for security and training purposes.

Information security / storage

We have physical, electronic and procedural safeguards that protect your information. We store all data electronically. Data is stored on servers located in Hong Kong and which are protected by actively maintained firewalls. We make use of up-to-date anti-virus software and the servers have restricted physical access.

If you provide paper based documentation we may retain the paper documents in addition to saving copies in an electronic format.

Transmission of data on the internet, including the sending of emails, can never be completely secure. We do not and cannot guarantee security of information collected or transmitted electronically however, we take reasonable care to safeguard your personal information.

Data sharing

Vcan Group Companies

We may share your information with our affiliated companies in order to provide you with access to our services, which may be located outside Hong Kong. In such case, we will ensure that data protection measures are consistent with the standards in Hong Kong.

Regulators

We may need to share your information with domestic and international regulators including: the Hong Kong Customs and Excise Department, and Inland Revenue Department or with law enforcement agencies, the tax and regulatory authorities in your jurisdictions.

Banks

We may need to share your information with third parties in order to process your transactions e.g. our banking counterparties.

Additionally owing to the nature of our business we may need to share your information with people or organizations outside of Hong Kong such as intermediary or beneficiary banks: e.g. you request us to make a USD payment to Mainland China the funds would be cleared through an intermediary bank in the United State of America before reaching the Mainland China. We are required to include certain information on the payment which may include your name and address.

Other parties

We will not disclose your personal information to any third party unless we have your consent, are required to by law or have previously informed you. We may share your information with anyone that you have given us permission to, any person acting on your behalf or with a co-branded Vcan partner who may have introduced you to us.

We may share your information with trusted companies providing services to us under confidentiality agreements or to companies that assist us in providing our services to you e.g. card transaction processing. These companies do not have any rights to share your information with other third parties (unless required by law) or to market other services to you.

We do not sell any personal data that we hold about you.

How do I request information?

You have the right to request details of the information we hold about you, a description of that data, the purposes for which it is being used and any parties with which we share your information. You

also have the right to require us to correct any inaccuracies in the personal data which we hold about you.

We may charge you an administration fee for providing this information. Requests for access to data or correction of data should be made in writing to the Data Protection Officer at legal@vcanfintech.com for further information.

How long is personal information retained?

Vcan will only retain your information for as long as is necessary but usually no more than 7 years after the end of the business relationship.

How is this policy updated?

We may amend this policy from time to time. If we make any substantial changes to the way we use your personal information we will notify you by posting a prominent notice on our website.