

VISTRA MACAU SAR PRIVACY NOTICE
《澳門特別行政區瑞致達私隱聲明》

Effective Date: from 17 May 2022
生效日期：2022年5月17日起

This Privacy Notice explains how particular companies in the Vistra Group collect, use and disclose your personal data, and your rights in relation to the personal data it holds.

本《私隱聲明》闡述瑞致達集團的特定公司如何收集、使用及披露您的個人資料，並您就其所持有的個人資料而享有的權利。

VISTRA (MACAU) LIMITADA (in this Privacy Notice, “us”, “we” and “our”) is the data controller of any personal data we process in relation to you.

VISTRA (MACAU) LIMITADA（在本《私隱聲明》中稱為「我們」及「我方」）是我們處理與您相關個人資料的資料控制者。

Our contact details are:
我們的聯絡資料如下：

Telephone number: +853 2870 1530
電話號碼：+853 2870 1530

Fax: +853 2833 0059
傳真：+853 2833 0059

Email: privacy@vistra.com
電郵：privacy@vistra.com

This Privacy Notice supersedes any privacy notice or equivalent policy issued by us in relation to Macau SAR previously.

本《私隱聲明》取代我們之前就澳門特別行政區所發布的任何私隱聲明或同等政策。

Your Rights
您的權利

You have the following rights in regard to any of your personal data that we process:
對於我們所處理與您相關的任何個人資料，您擁有以下權利：

- Confirmation as to whether or not personal data relating to you is being processed by us and information as to the purposes of the processing, the categories of personal data concerned and the recipients or categories of recipients to whom such personal data is disclosed;
有權確認與您相關的個人資料是否正由我們處理，並了解處理目的、相關個人資料的類別，以及該等個人資料的披露對象或披露對象類別；
- Communication of the personal data undergoing processing and of any available information as to their source;
有權獲取通訊以了解正在處理的個人資料，以及有關來源的任何適用資訊；
- The rectification, erasure or blocking of personal data, the processing of which does not comply with the provisions of the Macau Personal Data Protection Act (Law no. 8/2005 of August 22), in particular because of the incomplete or inaccurate nature of such personal data;
如個人資料的處理不符澳門《個人資料保護法》(2022年8月8/2005號法律)，尤其為該等個人資料不完整或不準確，則有權要求糾正、刪除或封鎖該等個人資料；

- The right to object at any time to the processing of personal data relating to you;
有權隨時拒絕我們處理與您相關的個人資料；
- To request us not to send you any marketing communications.
有權要求我們不要向您發送任何市場推廣通訊。

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply.

請注意，以上並非絕對權利，我們可能有權在例外的情況下拒絕要求。

You can find out more about any rights you may have under local legislation at www.gpdp.gov.mo. If you are not based in Macau SAR, other local data protection laws and regulations may also apply. In such cases, please refer to your local regulator.

如欲進一步了解您根據當地法例而享有的任何權利，可瀏覽 www.gpdp.gov.mo。如您並非身處澳門特別行政區，則其他當地資料保護法律及規例亦可能適用。在此等情況下，請諮詢您當地的規管機關。

If you have any questions about how we use your personal data, or you wish to exercise any of the rights set out above, please contact us using any one of the following:

若對我們如何使用您的個人資料存有任何疑問，或希望行使以上任何權利，請透過以下任何一種方式聯絡我們：

By post: Attn: Director, VISTRA (MACAU) LIMITADA, 18th Floor, Praia Grande Commercial Centre, 429 Avenida da Praia Grande, Macau SAR.

郵寄：收件者：澳門特別行政區南灣大馬路 429 號南灣商業中心 18 樓 VISTRA (MACAU) LIMITADA 總監

By email: privacy@vistra.com

電郵： privacy@vistra.com

By telephone: +853 2870 1530

電話：+853 2870 1530

By fax: +853 2833 0059

傳真：+853 2833 0059

If you are not satisfied with how we are processing your personal data, you can also make a complaint to the:

如您不滿意我們處理您個人資料的方式，亦可向以下單位投訴：

Macau SAR Office for Personal Data Protection

澳門特別行政區個人資料保護辦公室

Address: Avenida da Praia Grande, N.º 804, Edif. China Plaza, 17.º andar, Macau

地址：澳門南灣大馬路 804 號中華廣場 17 樓

P.O. Box: P.O. Box 880, MACAU

郵政信箱：澳門郵政信箱 880 號

Tel: +853 2871 6006

電話：+853 2871 6006

Fax: +853 2871 6116

傳真：+853 2871 6116

Email – info@gpdp.gov.mo

電郵 – info@gpdp.gov.mo

How we collect your data 我們如何收集您的個人資料

We may collect your personal data in a number of ways, for example:
我們可能透過多種方式收集您的個人資料，例如：

From the information you provide to us when you meet us;
您與我們接洽時向我方提供資料；

- From information about you provided to us by your company or an intermediary;
您的公司或中介向我們提供有關您的資料；
- When you communicate with us by telephone, fax, email or other forms of electronic communication. In this respect, we may monitor, record and store any such communication;
當您透過電話、傳真、電郵或其他電子通訊方式與我們通訊時。在此情況下，我們可能監察、記錄及儲存任何相關通訊；
- When you complete (or we or others complete on your behalf) client information forms;
當您填寫 (或我們或他人代您填寫) 客戶資料表時；
- From other companies in the Vistra Group;
資料來自瑞致達集團旗下其他公司；
- From your agents, advisers and/or intermediaries;
資料來自您的代理、顧問及／或中介；
- From publicly available sources or from third parties.
資料來自公共可用資源或第三方。

The categories of personal data we collect 我們收集的個人資料類別

We may collect the following categories of personal data about you:
我們可能收集以下各類與您相關的個人資料：

- Your name and contact information such as your home or business address, email address and telephone number;
您的姓名及聯絡資料，例如您的住址或辦公地址、電郵地址及電話號碼；
- Biographical information which may confirm your identity including your date of birth, tax identification number and your passport number or national identity card details, country of domicile and/or your nationality;
用於確認您身份的個人簡歷資訊，包括出生日期、稅務識別號碼、護照號碼或國家身份證資料、居住國家及／或國籍；
- An understanding of your goals and objectives in procuring our services;
用於了解您獲取我方服務的目標及目的；
- Information to assess whether you may represent a politically exposed person or money laundering risk.
用於評估您是否政治敏感人物或存在洗錢風險的資訊。

The basis for processing your personal data (other than with your consent), how we use that personal data and whom we share it with

個人資料的處理基礎（在得到您的同意以外）、使用方式及分享對象

(i) Performance of a contract with you
履行與您之間的合約

We process your personal data because it is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract.

我們處理您的個人資料，是因需要履行與您所訂立的合約或在訂立合約前按照您的要求採取行動。

In this respect, we for instance use your personal data for the following:

在此情況下，我們會為以下目的而使用您的個人資料，例如：

- To prepare an invoice for you regarding the services we offer;
就我們提供的服務為您擬備發票；
- To provide you with the services as set out in our relevant terms of engagement;
按照相關約定條款所列向您提供服務；
- To deal with any complaints or feedback you may have;
處理您可能提出的任何投訴或意見；
- For any other purpose for which you provide us with your personal data.
用於您向我們提供個人資料的任何其他目的。

In this respect, we may share your personal data with or transfer it to the following:

在此情況下，我們可能向以下各方分享或轉移您的個人資料：

Your agents, advisers and/or intermediaries;

您的代理、顧問及／或中介；

- Other companies in the Vistra Group whom we engage to assist in delivering the services to you;
獲我們聘用以協助向您提供服務的瑞致達集團旗下其他公司；
- Third parties whom we engage to assist in delivering the services to you;
獲我們聘用以協助向您提供服務的第三方；
- Our professional advisers where it is necessary for us to obtain their advice or assistance, including lawyers, accountants, IT or public relations advisers;
我們為獲取意見或協助而必須聘用的專業顧問，包括律師、會計師、資訊科技人員或公關顧問；
- Other third parties such as intermediaries who we introduce to you. We will wherever reasonable possible tell you who they are before we introduce you;
其他第三方，例如我們向您介紹的中介。我們將在合理可行的情況下，於介紹前先向您說明第三方的身份；
- Our (software application and data centre) data storage and processing providers.
我們 (軟件應用程式及資料中心) 的資料儲存及處理服務供應商。

(ii) Legitimate interests
合法權益

We may also process your personal data because it is necessary for our legitimate interests, or sometimes where it is necessary for the legitimate interests of another person.

我們亦可能在行使我方合法權益所必需的情況下，或有時在行使他人合法權益所必需的情況下，處理您的個人資料。

In this respect, we for instance use your personal data for the following:

在此情況下，我們會為以下目的而使用您的個人資料，例如：

- For marketing to you. In this respect, see the separate section on Marketing below; 向您進行市場推廣。就此，請參閱以下的市場推廣章節；
- Training our staff or monitoring their performance; 培訓我方員工或監察員工表現；
- For the administration and management of our business, including recovering money you owe to us, and archiving or statistical analysis; 操作及管理我方業務，包括追討您虧欠我們的款項，並進行歸檔或統計數據分析；
- Seeking advice on our rights and obligations, such as where we require our own legal advice; 就我方權利及義務尋求意見，例如我們需要為自身獲取法律意見；

In this respect we may share your personal data with the following parties:

在此情況下，我們可能向以下各方分享您的個人資料：

- Your agents, advisers and/or intermediaries; 您的代理、顧問及／或中介；
- Other companies in the Vistra Group whom we engage to assist in delivering the services to you; 獲我們聘用以協助向您提供服務的瑞致達集團旗下其他公司；
- Third parties whom we engage to assist in delivering the services to you; 獲我們聘用以協助向您提供服務的第三方；
- Our professional advisers where it is necessary for us to obtain their advice or assistance, including lawyers, accountants, IT or public relations advisers; 我們為獲取意見或協助而必須聘用的專業顧問，包括律師、會計師、資訊科技人員或公關顧問；
- Other third parties such as intermediaries whom we introduce to you. We will wherever reasonably possible tell you who they are before we introduce you; 其他第三方，例如我們向您介紹的中介。我們將在合理可行的情況下，於介紹前先向您說明第三方的身份；
- Other third parties in case of any court proceedings; 其他第三方，以應對任何法庭程序；
- Our (software application and data centre) data storage and processing providers; 我們 (軟件應用程式及資料中心) 的資料儲存及處理服務供應商；
- Third parties and their advisers where those third parties are acquiring, or considering acquiring, all or part of our business. 第三方及其顧問，以應對有關該等第三方收購或考慮收購我方所有或部分業務的情況。

(iii) Legal obligations 法律義務

We may also process your personal data for our compliance with any legal or regulatory obligation which we are under.

我們亦可能因履行我方所承擔的任何法律或規管義務，而處理您的個人資料。

In this respect, we may for instance use your personal data for the following:

在此情況下，我們可能為以下目的而使用您的個人資料：

- To meet our compliance and regulatory obligations, such as compliance with anti-money laundering laws; 履行我們的合規及規管義務，例如遵循反洗錢法；

- As required by tax authorities or any competent court or legal authority.
配合稅務當局或任何具司法管轄權的法院或法律機關的要求。

In this respect, we may share your personal data with the following:

在此情況下，我們可能向以下各方分享您的個人資料：

- Our professional advisers where it is necessary for us to obtain their advice or assistance, including lawyers, accountants, IT or public relations advisers;
我們為獲取意見或協助而必須聘用的專業顧問，包括律師、會計師、資訊科技人員或公關顧問；
- Our auditors where it is necessary as part of their auditing functions;
我們的核數師，以便他們於審計中作必要之用；
- Other companies in the Vistra Group whom we engage to assist in delivering the services to you;
獲我們聘用以協助向您提供服務的瑞致達集團旗下其他公司；
- Third parties whom we engage to assist in delivering the services to you;
獲我們聘用以協助向您提供服務的第三方；
- Our (software application and data centre) data storage and processing providers;
我們 (軟件應用程式及資料中心) 的資料儲存及處理服務供應商；
- Relevant regulators or law enforcement agencies where we are required to do so, or during court proceedings or litigation;
相關規管機關或執法機構，以遵循其要求，或應對法庭程序或訴訟；
- Other third parties as may be applicable.
其他適用的第三方。

Marketing

市場推廣

We may from time to time send you marketing communications about the same or similar services we or any of our group companies provide, as well as other information in the form of alerts, newsletters and invitations to events or functions which we believe might be of interest to you.

我們可能不時就有關我們或集團旗下任何公司的相同或類似服務，而向您發送市場推廣通訊，以及因應我們對您興趣的了解而透過提示、電子通訊，以及事件或活動的邀請而發送其他資料。

We may communicate this to you in a number of ways including by post, telephone, email, SMS or other digital channels.

我們可能以郵寄、電話、電郵、短訊或其他數碼渠道等多種方式，向您發送此等通訊。

If you object to receiving marketing from us at any time, please contact us as outlined above, or click “Unsubscribe” in any marketing emails sent by us to opt out of such communication.

如您在任何時候希望拒絕接收我們的市場推廣資料，請按上述方式聯絡我們，或在我們發送的任何市場推廣電郵中點擊「取消訂閱」，以拒收該等通訊。

Data Transfers

資料轉移

When sharing your personal data with other parties as set out in this Privacy Notice, we may transfer your personal data across jurisdictions, and by using our services, you consent to us doing so.

當我們根據本《私隱聲明》所列與其他方分享您的個人資料時，可能會在不同司法管轄區轉移您的個人資料。您一旦使用我們的服務，即代表您同意我們作出此等轉移。

In doing so however, we comply with any applicable local laws or regulations in relation to such transfers.

進行該等資料轉移時，我們會遵循任何適用的當地法律或規例。

To find out more about such transfers by us of your personal data, please contact us as outlined above.

如欲了解更多有關我們對您個人資料所進行的該等轉移，請按上述方式聯絡我們。

Retention of your data

保留您的資料

We will only retain your personal data for as long as we have a lawful reason to do so. In particular: 我們只會在具有合法原因的期限內保留您的個人資料，尤其是：

- where we collected your personal data as required by anti-money laundering legislation, including for identification, screening and reporting, we will normally retain that personal data after the termination of our relationship for as long as we are required by laws and regulations applicable to us, unless we are required to retain this information for a longer period of time for the purposes of court proceedings; or

在我們根據反洗錢法例要求收集您個人資料的情況下，包括用於身份識別、篩查和報告，我們通常會在與您的關係終止後，根據適用於我們的法律及規例的期限要求而保留該等個人資料，除非我們需要為法庭程序而將資料保留更長的期限；或

- otherwise, we will in most cases retain your personal data for a period of seven (7) years after the termination of our contractual or other relationship with you in case any claims arise out of the provision of our services to you.

不然，如因向您提供我方服務而引起任何索償，我們會在大部分情況下，在我方與您訂立之合約或其他關係終止後將您的個人資料保留七 (7) 年。

[END]

[完]