

易云汇香港有限公司 – 隐私政策

Yeewallex HK Limited (“Yeewallex”, or “we” or “our” or “us”, which shall include its holding companies, subsidiaries, directors, investors, employees, etc.) understand the importance of privacy and work hard to keep your personal data confidential. This Privacy Policy, together with our Terms and Conditions for Yeewallex Card Service (“**Terms and Conditions**”), governs Yeewallex’s collection, processing and use of your personal data. In this Privacy Policy, “personal data” refers to information that may identify an individual, such as name, address, e-mail address, trading information, and banking details but does not include anonymized and/or aggregated data that does not identify a specific user.

易云汇香港有限公司（“易云汇”，或“我们”或“我们的”，包含其控股公司，子公司，董事，投资人，雇员等）理解隐私的重要性并致力于确保您个人信息的保密性。本隐私政策与我们的 Yeewallex 卡服务条款及条件（“**条款及条件**”）一同规定了易云汇对您个人信息的收集、处理及使用。在本隐私政策中，“个人信息”是指可识别到个人的信息，例如姓名，地址，邮箱地址，交易信息及银行详情，但不包括匿名的及/或不可识别到个人的汇总信息。

This Privacy Policy is written in English and translated into Chinese. In case of any discrepancy between the Chinese and English versions, the English version shall prevail.

本隐私政策以英文书写并以中文翻译。若中英文版本有任何歧义，须以英文版本为准

By entering the Terms and Conditions, you agree to be bound by this Privacy Policy and any amendments thereto and agree to the collection, processing and communication of your data as described in this Privacy Policy.

通过接受条款及条件，您同意受本隐私政策及任何对本政策的修改的约束，并同意本隐私政策下所述的对您信息的收集、处理及传输。

1 Introduction 简介

In order to be able to make our services available to you in compliance with the obligations imposed by any applicable law and by rules, guidelines and directives from time to time issued by regulatory authorities, we must ask you for certain information about yourself, including identification documents, financial information (e.g., information about your identity, e-commerce sales, beneficiary account, etc.) and other information/documents as from time to time required by the applicable laws and rules, guidelines and directives. We will utilize the data provided by you in accordance with applicable provisions of governing data protection laws, which shall include, without limitation, the Personal Data (Privacy) Ordinance (Cap.486 of the laws of Hong Kong). The information obtained shall, as a matter of principle, be used by us solely for providing our services and solely to the extent necessary to render such services. The information about you which we possess shall, as a matter of principle, not be made accessible to third parties unless we are under any legal obligation to do so or under any court order with competent jurisdiction, or we must do so to render our services to you (such as rendering your personal data to our counterparts in any part of the world or the banks for processing the funds). In other cases, we will obtain your consent before we disclose any of your personal data to any third party.

为了能够符合适用法和监管部门不定期颁布的法例、守则及指南所规定的义务向您提供我们的服务，我们必须向您询问有关您自己的某些信息，包括身份证明文件，财务信息（例如您的身份信息，电子商务销售，受益账户等）及不定期根据适用法律、法例、守则及指南所需要的其他信息/文件。我们将按照适用的、规管资料保护的法律来使用您所提供的信息，包括但不限于《个人资料(私隐)条例》（香港法律第 486 章）。原则上，我们所获得的信息将只限我们为了提供服务使用，并只限在提供该项服务所必需的程度内使用。原则上，我们所处理的与您有关的信息将不会提供给第三方，除非我们负有任何法律义务去提供，或在有管辖权的法域收到法庭命令，或为了向您提供我们的服务而必须如此（例如将您的个人资料提供给我们在世界任一地点的对接方或银行以便处理资金）。在其他情况下，在未得到您的同意前，我们不会将任何您的个人资料披露给任何的第三方。

2 Collection of information 信息收集

(a) Collected from Website Visitors 从网站访问者收集

Like most website operators, we automatically collect data which are not personal data that web browsers and servers typically make available, such as the browser type, language preference, referring site, and the date and time of each visitor request. Our purpose in collecting such non-personal data is to better understand how our visitors use our website, through cookies, web beacons, log files and other technologies:

正如大多数网站运营商一样，我们自动收集网页浏览器和服务器通常提供的非个人识别信息，如浏览器类型，语言偏好，引用站点及每个访问者请求的日期和时间。我们收集非个人识别信息的目的是为了更好地了解我们的访问者如何使用我们的网站。我们通过 cookies，网站信标，日志文件及其他技术收集：

- (i) your domain name, your browser type and operating system, web pages you view, links you click; and

您的域名，您的浏览器类型和操作系统，您查看的网页，您点击的连结；及

- (ii) your IP address, the length of time you visit our Website or use our Services, your activities on our Website, and the referring URL or the webpage that led you to our Website.

您的 IP 地址，您访问我们的网站或使用我们的服务的时间长短，您在我们的网站上的活动，以及引导您访问我们网站的引用 URL 或网页。

Please see Section 8 “Cookies” below for more information. Visitors can always refuse to supply such data, with the caveat that it may prevent them from being able to use our services.

请参阅下方第 8 节“cookies”以获取更多信息。访客有权拒绝提供个人身份信息，并得到网站的提醒称此行为可能会阻止他们使用我们的服务。

(b) Provided by Users 用户提供

You may provide us data about you by filling in forms on our website, or by corresponding with us (for example, by e-mail or telephone). The data you provide may include data about additional persons that are beneficial owners of our services. This includes that is provided to us about you:

您可以通过填写我们网站上的表格或通过与我们联系（例如电子邮件或电话）向我们提供有关您的信息。您提供的信息可能包括我们服务的其他受益所有人的信息。这些向我们提供信息的方式包括：

- (i) upon registration for the Yeewallex Card Service; 当您注册 Yeewallex 卡服务；
- (ii) when you log in to your Card Account or Master Account; 当您登录您卡账户或主账户；
- (iii) when entering a competition, promotion or survey; and 参与比赛、促销或调查时；及
- (iv) when a problem is reported or a request for support is received. 报告问题或请求支持时。

Visitors can always refuse to supply such personal data, but it may prevent them from being able to use our services.

访客有权拒绝提供个人信息，但这可能将阻止他们使用我们的服务。

3 Information we collect 我们收集的信息

We collect the personal data you provide directly to us when you apply for a Yeewallex Account, perform any transactions on the Yeewallex platform, or use other Yeewallex Services. This may include:

当您申请易云汇账户，在易云汇平台上执行任何交易或使用其他的易云汇服务时，我们会收集您的个人信息。这可能包括：

- (a) your contact information (e.g., name, email address, phone number, billing or mailing address);您的联系信息（例如，姓名，电子邮箱地址，电话号码，账单或邮件地址）；
- (b) bank and credit account information;银行和信用账户信息；
- (c) IP address; IP 地址；
- (d) identity validation (e.g., photograph, other information requested to verify your information, including copy of valid ID document or corporate documents);身份验证（例如，照片，其他要求您提供以核实您身份的信息，包括有效的身份证件副本或公司文件副本）；
- (e) publicly available and/or criminal history;公开的及/或犯罪历史；
- (f) national or tax identification numbers;国民身份或税务身份号码；
- (g) nationality;国籍；
- (h) date and place of birth;出生日期和地点；
- (i) details of any transactions carried out using any the services;使用任何服务进行的任何交易的详细信息；
- (j) any other information that you choose to provide to us (e.g., if you send us an email/otherwise contact us);您选择提供给我们的任何其他信息（例如，如果您向我们发送电子邮件/或以其他方式联络我们）；
- (k) calls/emails/other correspondence; and 电话/电邮/其他通讯； 及
- (l) information through Cookies and other tracking technologies as listed above and as described in the section below entitled “Cookies”.通过上面列出的 Cookies 和其他追踪技术的信息，如下文“Cookies”一节所述。

You shall be responsible for providing accurate and up-to-date information to us or we may not be able to provide any service to you.

您有责任向我们提供准确和最新的信息，否则我们可能无法向您提供任何服务。

If you are required to provide information about shareholders or beneficial owners of your business, you hereby acknowledge and confirm that you have that person’s consent to provide his/her information to us. This may include:

如果您需要提供有关您的业务的股东或受益所有者的信息，您据此承认并确认您获得该人同意将他/她的信息提供给我们。这可能包括：

- (m) contact information, such as name, home address, and email address; 联络信息，如姓名，家庭住址及电子邮箱地址；
- (n) account information, such as username and password; 账户信息，如用户名及密码；
- (o) financial information, such as bank account numbers, bank statement, and trading information; 财务信息，如银行账号，银行对账单及交易信息；
- (p) identity verification information, such as images of your government issued ID, passport, national ID card, or driving license. Depending on nationality, the information request may be different; and 身份验证信息，如您所在国政府颁发的身份证件影印本，护照影印本，国民身份证或驾驶执照影印本。所需的信息可能因国籍而有所不同；及
- (q) residence verification information, such as Utility bill details or similar information. 住址验证信息，如实用的账单详情或类似的信息。

We may collect and process Personal Data about your counterparties or third parties related to your business in providing our services. You shall be responsible to make sure that the privacy rights of any third parties, including your counterparties and other individuals related to your business, are respected, including ensuring appropriate disclosures about third party data collection and use; with respect to such data you hereby undertake with us that we are acting as your data processor, and we will process personal data in accordance with the terms of our agreement with you and act in accordance with your lawful instructions.

为提供我们的服务，我们可能收集和与您业务相关的对方或第三方的相关个人信息。您有责任确保任何第三方（包括您的对方及其他与您业务相关的个人）的隐私权受到尊重，包括确保适当披露对第三方信息的收集和使用；对于此类信息，您在此向我们保证，我们作为您的信息处理方，将根据我们的协议条款和您的合法指示处理个人信息。

4 Use of personal data 对个人信息的适用

We will only use your personal data to:

我们只会在以下情况使用您的个人信息：

- (a) process your transactions, including transfers into and out of any country in the World in accordance with the local laws of each such country;

处理您的交易，包括根据每一国家的当地法律，将资金汇入及汇出世界上的该任一国家。

- (b) perform the required controls and checks in accordance with money laundering/terrorist financing and know your customer requirements under any applicable law (which shall include the Anti-Money Laundering and Counter Terrorist Financing Ordinance (Cap.615 of the laws of Hong Kong), our internal control policies, and also the needs of any law enforcement agencies;

根据反洗钱/恐怖主义融资法律，进行必要的管控和检查，并根据任何适用法、我们的内控政策以及任何执法机构的需要（其中包括《打击洗钱及恐怖分子资金筹集条例》（香港法例第 615 章））了解您的客户要求；

- (c) analyze our website usage, and improve our website and website offerings;

分析我们的网站使用情况，改进网页及网站提供的服务；

- (d) help us respond to your customer service requests and support needs;

帮助我们回应您的客户服务请求和支持需要；

- (e) contact you about our services. The email address you provide may be used to communicate information and updates related to your use of our services. We may also occasionally communicate company news, updates, and related information relating to similar products and services provided by us; and

就我们的服务与您联系。您提供的邮箱地址可能用于传达与使用我们的服务有关的信息和更新。我们也可能不时传递与我们所提供的产品和服务类似的公司新闻、更新及相关信息。

- (f) administer contests, surveys or other site features as will from time to time be announced on our website.

管理促销、调查或其他网站特点，这些将不时在我们的网站上进行宣布。

5 Disclosure of Personal Data 披露个人信息

We only disclose your personal data (a) to legal and regulatory authorities as required by applicable law or court order with competent jurisdiction; and (b) to our employees, service providers and affiliated organizations. To this extent, we assure you that such disclosure shall be on a need-to-know basis, and an undertaking from such parties that they agree to keep such data confidential and will be subject to this Privacy Policy.

我们仅对以下各方披露您的个人信息：(a)根据适用法或有管辖权法域内的法庭命令，向法律及监管部门披露；及(b)向我们的雇员、服务提供商及附属机构披露。就此我们向您保证该披露将基于并仅限于所需了解的内容，并将基于该信息接收方同意对该信息进行保密的保证，同时该披露将受本隐私政策限制。

- (a) Disclosure to Third Parties

向第三方披露

In processing your transactions, we may share some of your personal data (on a need-to-know basis) with our service providers. Your information will not be sold, exchanged, or shared with any third parties without your consent, except to provide our services or as required by law or court order with competent jurisdiction. By using our services, you accept the contents of this Privacy Policy and agree to our disclosure of your personal data in accordance with this Privacy Policy.

在处理您的交易时，我们可能会与我们的服务提供商分享您的某些个人信息（基于并仅限于所需了解的内容）。未经您的同意，您的信息将不会对任何第三方出售、交换或共享，除非为了提供我们的服务或法律要求或有管辖权的法域内的法庭命令要求。通过使用我们的服务，您同意本隐私政策的内容并同意我们根据本隐私政策披露您的个人信息。

Our service providers are contractually bound to protect and use such information only for the purposes for which it was disclosed, except as otherwise required or permitted by law. We strive to ensure that such third parties will be bound by terms no less protective than those described in this Privacy Policy, all applicable laws and rules, guidelines and directives from time to time issued by any regulatory authority.

我们的服务提供商受合同约束有义务保护此类信息，并仅就其披露的目的使用此类信息，法律规定或允许的其他情形除外。我们致力于确保这些第三方将受到与本隐私政策、适用的法律法规、监管部门不定期颁布的守则及指南中的同等或更加严格的保护性条款的约束。

(b) Disclosure to Legal Authorities

向法律机关披露

We may share your personal data with law enforcement agencies and other governmental or regulatory bodies when:

在以下情况下，我们可能会与执法机构及其他政府或监管主体分享您的个人信息：

- (i) we are compelled by subpoena, court order, or other legal procedure; or
我们受传票、法庭命令或其他法律程序要求；
- (ii) we have a reasonable ground to believe that the disclosure is necessary to prevent physical harm or financial loss; or
我们有合理依据相信，披露对于防止实际损害或经济损失而言是必要的；
- (iii) disclosure is necessary to report suspected illegal activity; or
披露对于举报涉嫌的非法活动是必要的；
- (iv) disclosure is necessary to investigate violations of this Privacy Policy or our Terms and Conditions.
披露对于调查违反本隐私政策或我们的条款及条件而言是必要的。

6 Transfer and storage of data 传输和储存信息

Our services are global in nature and data may be stored and processed in any country where we have operations or where we engage service providers. That means data may be transferred and stored outside the boundary of Hong Kong. Data we collect may be transferred to and/or stored at a destination outside Hong Kong, which may have data protection rules that are different from Hong Kong, including transferring data to and from regulatory authorities, or to staff operating outside Hong Kong who process data on our behalf or for our suppliers. Staff may be engaged in the fulfilment of your request and the provision of support services. However, we will take measures to ensure that any such transfers comply with the laws of Hong Kong and that your data remains protected to the standards described in this Privacy Policy. By submitting your personal data to us, you agree to our transfer, storing or processing in accordance with this Privacy Policy. We will take steps reasonably necessary to ensure that the data is treated securely and in accordance with this Privacy Policy and the applicable laws.

我们的服务是全球性的，信息可能在我们业务范围的或我们与服务提供商合作的任何国家进行储存和处理。这意味着信息可能会传输及储存到香港境外。我们收集的信息可能会传输及/或储存至香港外的一个目的地，该地可能有着与香港不同的信息保护规则，包括从监管机关获得及向监管机关传输信息，或传输给在香港境外运营的、代表我们或为我们的供货商处理信息的员工。员工可能从事履行您的要求并提供支持服务的业务。但是，我们将采取措施确保任何此类传输符合香港法律，并确保对您的信息保护符合本隐私政策所描述的标准。通过向我们提交您的信息，即表示您同意我们根据本隐私政策进行转让、储存或处理。我们将采取合理必要的一切步骤，确保信息得到安全处理，并符合本隐私政策和适用的法律。

7 Protection of Certain Personal Data 保护某些个人信息

We take all organizational and technical measures appropriate to protect against the unauthorized access, use, alteration or destruction of your personal data.

我们采取适当的组织和措施，防止对您个人信息未经授权的访问、使用、更改或破坏。

All person data you provided to us will be stored on our secure servers. You shall be responsible for keeping your account credentials safe and secure and not sharing them with anyone.

您提供给我们所有信息都存储在我们的安全服务器上。您有责任保持您的账户凭证的安全，并不与任何人分享。

You acknowledge that transmission of information via the internet is not completely secure; any such transmission shall be at your own risk. Although no one can guarantee security of data transmitted via the internet, we strive to protect the data transmitted via the Yeewallex Account. We use industry standard security techniques to help keep the data safe including encryption when the data is in transit and at rest.

您明白通过互联网传输信息不可能完全安全。任何此类传输都由您自担风险。虽然没有人可以保证通过互联网传输信息的安全性，我们致力于保护通过易云汇账户传输的信息安全。我们使用行业标准安全技术来帮助保持信息安全，包括信息传输时及休眠时的加密技术。

The Yeewallex website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any User Data to such third parties.

易云汇网站可能不定期包括通向及来自我们合作伙伴、广告商及关联公司网站的链接。如果您链接到任何这些网站，请注意，这些网站有自己的隐私政策，我们不对这些政策承担任何责任。在向任何此类第三方提交任何用户信息前，请先查看这些政策。

8 Cookies

Cookies are small data files that track and collect your browsing information from your web browser. Cookies will then use that information during your future visits to our website, so that the server may immediately recognize that you have been to the website before.

Cookies 是小型信息文件，从您的浏览器追踪及收集您的浏览信息。Cookies 将在您未来访问我们的网站时使用该信息，从而使服务器能立即辨识到您曾经访问过我们的网站。

Cookies will not destroy any files in your computer, but are only used to track information such as which pages users' visit, on which pages users usually start and stop, and how frequent users visit the website, etc. We do not use cookies to track the identity of the actual user, and cookies will only tell if a certain computer has visited our website in the past.

Cookies 不会毁坏您计算机中的任何文档，它仅用于跟踪信息，例如用户访问过的网页，用户通常开始浏览及停止浏览的页面，用户多长时间访问网站一次，等等。我们不会使用 cookies 来追踪实际用户的身份，cookies 只能提供一台特定计算机是否曾访问过我们的网站的信息。

Cookies will not collect personal information such as names or e-mail addresses. Nevertheless, if you do not wish to have cookies in your computer, you may adjust the settings in your web browser to reject cookies. However, if you do not wish to receive Cookies, some functions may not be usable.

Cookies 不会收集个人信息，例如姓名或电子邮箱地址。尽管如此，如果您不希望您的计算机上存在 cookies，您可以调整您的网站浏览器以拒绝 cookies。然而，如果您不希望接收 Cookies，某些功能可能无法使用。

Our website uses cookies. If you visit our website and your browser settings accept cookies, we consider this as acceptance of our use of cookies.

我们的网站使用 cookies。如果您访问我们的网站且您的浏览器设定接受 cookies，我们将视之为您接受我们对 Cookies 的使用。

We shall use cookies to collect statistics about the number of visits of users to our website and the users' preferences of websites and online services offered by us.

我们将使用 cookies 收集资料，统计我们网站的访问者的访问次数，用户对网站的偏好及对我们提供的在线服务的偏好。

You may choose to accept or reject cookies. If you reject the cookies, you may not be able to use some of the functions of our website and accessing some online services on our website.

您可以选择接受或拒绝 cookies。如果您拒绝 cookies，您可能无法使用我们网站的某些功能及某些在线服务。

9 Amendments to this Privacy Policy 对本隐私政策的调整

This Privacy Policy may be amended from time to time as new features are added to our services or as we incorporate suggestions from our stakeholders. We may change this Privacy Policy at any time by posting a revised version of it on our website. Such amendments shall be effective when announced on our website. When you continue using our services, you are deemed to be bound by the revised Privacy Policy. If you disagree with the terms of this Privacy Policy, you may close your account at any time.

随着新功能加入到我们的服务，或随着我们纳入持份者的提议，本隐私政策可能会不时有所调整。我们可能会通过在我们的网站上发布其修改版来更改本隐私政策。该等调整将于其在网站被发布时生效。当您继续使用我们的服务，您将被视为受修改版的隐私政策的限制。如果您不同意本隐私政策的条款，您可以随时关闭您的账户。

10 Liability 责任

We shall in no event be liable to you in respect of any claims, losses, damages, expenses (including reasonable legal fees) arising out of or in connection with the use and/or disclosure or dissemination of the user data in accordance with this Privacy Policy and any consents that you may have otherwise provided to us.

对于符合本隐私政策和其他已获得您同意的任何使用及/或披露或传播用户信息的行为，由此产生或与此相关的任何索赔、损失、损害赔偿、费用（包括合理法律费用），我们概不负责。

11 Governing Law 适用法律

This Privacy Policy shall be governed by and construed in accordance with Hong Kong law.

本隐私政策受香港法律管辖并依据香港法律解释。