

Cayman Privacy Notice

开曼隐私通知

This privacy notice (**Cayman Privacy Notice**) explains the manner in which Lion Brokers Limited (the **Company**) collects, processes and maintains personal data about you pursuant to the Cayman Islands Data Protection Law (as amended from time to time, the **DPL**).

本隐私通知（**开曼隐私通知**）解释狮子国际有限公司 Lion Brokers Limited（**本公司**）根据《开曼群岛资料保护法》（不时修订的 **DPL**）收集，处理和维持您个人资料的方式。

The Company is committed to processing personal data in accordance with the DPL. In its use of personal data, the Company will be characterised under the DPL as a 'data controller', whilst certain of the Company's service providers, affiliates and delegates may act as 'data processors' under the DPL.

本公司致力于根据 DPL 处理个人资料。在使用个人资料时，本公司将根据 DPL 被定性为“资料控制者”，而本公司的某些服务供应商，附属公司和代表则可根据 DPL 被定性为“资料处理者”。

Interpretation: For the purpose of this Privacy Notice **you** or **your** shall mean, you, a customer or potential customer of the Company (a **Customer**) and shall also include any individual connected to you which could include: any person owning or controlling the Customer, having a beneficial interest in the Customer, any person for whom the Customer is acting as agent or nominee, any trustee, settlor or protector of a trust, and the directors, managers, members, officers and employees of all such persons. **We, us or our** means the Company in its capacity as data controller of the personal data.

解释：就本隐私通知而言，您或您的是指您为本公司的客户或潜在客户（**客户**），还应包括与您有关的任何个人，包括：任何拥有或控制客户，在客户中拥有实益权益的人，客户作为代理人或代名人的人，信托的任何受托人，托管人或保护人，以及所有这些人的董事，经理，成员，高级职员和雇员。我们或我们的是指本公司作为个人资料的资料控制人。

Personal data: By virtue of being a Customer of the Company, the Company, the entities providing anti-money laundering services and customer KYC services to the Company, and other relevant service providers and their respective affiliates and delegates (**Authorised Entities**) may collect, record, store, transfer and otherwise process personal data¹ by which individuals may be directly or indirectly identified.

个人资料：由于是本公司的客户，本公司、向本公司提供反洗钱服务和客户调查服务（KYC）的实体以及其他相关服务提供商及其各自的关联公司和代表（**授权实体**）可以收集，记录，存储，转移和以其他方式处理个人资料¹，通过这些资料可以直接或间接识别个人。

¹Examples of personal data include: name, title, date of birth, age, gender, nationality, picture, national identification number, usernames, email address, residential address, postal address, telephone / mobile / fax number, family structure, siblings, offspring, source of wealth, personal assets, bank account numbers and income details, tax identification number, financial and investment qualification, shareholder reference number, payment details and other details of products and services purchased by the client, power of attorney information, job titles, employment history, employer details, personal data contained in emails, data regard the client's preferences in connection with marketing communications, personal data obtained pursuant to standard criminal record checks, data obtained further to the Company's standard anti-money laundering and client due diligence checks. It may also include data which, when aggregated with other data, enables an individual to be identified, such as an IP address and geolocation data.

个人资料示例包括名字、头衔、出生日期、年龄、性别、国籍、照片、国家身份证号码、用户名、电子邮件地址、住址、邮政地址、电话/移动电话/传真号码、家庭结构、兄弟姐妹、子女、财富来源、个人资产、银行帐号和收入详情、税务识别号码、财务和投资资格、股东参考号码、付款详情和客户购买的产品和服务的其他详情、授权书信息、职位、就业历史、雇主详情、电子邮件中包含的个人资料、与客户在营销传播方面的偏好有关的资料、根据标准犯罪记录检查获得的个人资料、进一步根据公司标准反洗钱和客户尽职调查检查获得的资料。还包括当与其他资料聚合时使得能够识别个人的资料，例如 IP 地址和地理位置资料。

Much of the personal data will be provided through completion of forms, questionnaires and other information provided by the Customer in writing (including any anti-money laundering, identification, and verification documentation), in person, by telephone (which may be recorded), fax, electronically or by any other means.

大部分个人资料将通过填写表格、问卷及客户以书面（包括任何反洗钱，识别及核实文件）、亲自、电话（可录音）、传真、电子或任何其他方式提供。

We may combine personal data that you provide to us with other personal data that we collect from or about you. This may include personal data collected in an online or offline context including from credit reference agencies and other available public databases or data sources, such as news outlets, websites and other media sources and international sanctions lists.

我们可能会将您提供给我们的个人资料与我们从您处收集的或关于您的其他个人资料合并。这可能包括在线或离线环境下收集的个人资料，包括从信用信息机构和其他可用的公共资料库或资料来源，如新闻媒体，网站和其他媒体来源以及国际制裁名单收集的个人资料。

If you are a nominee or a corporate entity, this Cayman Privacy Notice will be relevant for those individuals connected to you and you should transmit this document to such individuals for their awareness and consideration.

如果您是代名人或公司实体，本开曼隐私通知将适用于与您相关的个人，您应将本文件发送给这些个人，以供其了解和考虑。

Why is your personal data processed: Your personal data will be processed fairly and for lawful purposes, including:

为何处理你的个人资料： 你的个人资料会被公平及合法地处理，包括：

A Where the processing is necessary for the Company to perform a contract to which you are a party or for taking pre-contractual steps at your request, which may include the following circumstances:

A 如果该处理是公司履行您所参与的合同或应您的要求采取合同前步骤所必需的，可能包括以下情况：

(a) to operate the Company, including managing and administering the Company on an on-going basis which enables the Company and its Customers to satisfy their contractual duties and obligations to each other;

(a) 经营公司，包括持续管理和治理公司，使公司及其客户能够履行彼此的合约责任和义务；

(b) to provide services to you, or make any payment or distribution to you, such as recording your information in the registers and accounts of the Company;

(b) 向阁下提供服务或向阁下作出任何付款或分配，例如将阁下的资料记录在本公司的登记册及账目内；

(c) to send you statements in relation to your account at or through the Company;

- (c) 向你发送有关你在本公司或通过本公司开立的帐户的结单;
 - (d) to facilitate the continuation or termination of the contractual relationship between you, other Customers and the Company; and/or
 - (d) 促成您、其他客户与本公司之间合同关系的延续或终止; 和/或
 - (e) to administer and facilitate the transfer of funds and other transactions between you, other Customers and the Company;
 - (e) 管理和促进您、其他客户和本公司之间的资金转移和其他交易;
- B Where the processing is necessary for compliance with any legal, tax or regulatory obligation to which the Company is subject, which may include the following circumstances:
- B 为遵守公司所承担的任何法律, 税务或监管义务而必须进行的处理, 可能包括以下情况:
- (a) to undertake Customer due diligence and on-boarding checks;
 - (a) 进行客户尽职调查和入职检查;
 - (b) to carry out know-your-client, client due diligence, anti-money laundering, counter-terrorist financing and proliferation financing checks of Customers (and where applicable, their controllers and beneficial owners);
 - (b) 对客户进行客户了解, 客户尽职调查, 反洗钱, 反资助恐怖主义和扩散融资方面的检查 (适用时还包括其控制人和受益所有人);
 - (c) to comply with requests from regulatory, governmental, tax and law enforcement authorities;
 - (c) 遵守监管、政府、税务和执法当局的要求;
 - (d) to prevent and detect fraud;
 - (d) 防止和侦查欺诈行为;
 - (e) surveillance and investigation activities;
 - (e) 监测和调查活动;
 - (f) to carry out audit checks and to instruct auditors;
 - (f) 进行审计检查并指导审计人员;
 - (g) to comply with FATCA, CRS and other comparable legislation;
 - (g) 遵守《海外账户纳税法案》、《共同申报准则》和其他类似立法;
 - (h) to comply with applicable sanctions and embargo legislation; and/or

- (h) 遵守适用的制裁和禁运立法；和/或
 - (i) to maintain statutory registers;
 - (i) 备存法定登记册；
- C Where the processing is for the purposes of legitimate interests pursued by the Company or by an Authorised Entity to whom the data are disclosed, which may include the following circumstances:
- C 如果处理是为了公司或向其披露资料的授权实体追求合法利益的目的，可能包括以下情况：
- (a) to comply with a legal, tax, accounting or regulatory obligation to which the Company or such Authorised Entity is subject;
 - (a) 遵守公司或此类授权实体所承担的法律，税务，会计或监管义务；
 - (b) to assess and process requests you make;
 - (b) 评估和处理您提出的请求；
 - (c) to send updates, information and notices or otherwise corresponding with you in connection with the services provided by the Company to you;
 - (c) 发送与本公司向您提供的服务有关的最新情况，信息和通知或以其他方式与您通信；
 - (d) to verify the identity of the Company to third parties in connection with any actual or proposed business and/or for any purpose which the Company considers is necessary or desirable;
 - (d) 就任何实际或拟议的业务和/或公司认为必要或可取的任何目的，向第三方核实公司的身份；
 - (e) to assist the Company in the improvement and optimisation of related services, advertising and marketing;
 - (e) 协助公司改善及优化相关服务，广告及市场推广；
 - (f) to investigate any complaints, or pursue or defend any claims proceedings or disputes (where domestic or foreign);
 - (f) 调查任何投诉，或对任何索赔程序或争议进行或进行辩护（无论国内还是国外）；
 - (g) to provide you with, and inform you about, related products and services;
 - (g) 向您提供并告知您相关的产品和服务；
 - (h) for risk management and risk controlling purposes relating to the Company;
 - (h) 用于与公司有关的风险管理和风险控制；

- (i) to comply with audit requirements;
- (i) 遵守审计要求;
- (j) to ensure compliance with internal policies and procedures;
- (j) 确保遵守内部政策和程序;
- (k) to seek professional advice including legal advice;
- (k) 寻求专业意见, 包括法律意见;
- (l) to facilitate business asset transactions involving the Company or related entities;
- (l) 为涉及本公司或相关实体的业务资产交易提供便利;
- (m) to monitor communications to/ from the Company (where permitted by law);
- (m) 监控与公司之间的通信 (在法律允许的情况下);
- (n) to protect the security and integrity of the IT systems of the Company;
- (n) 保护公司 IT 系统的安全性和完整性;
- (o) for direct marketing purposes;
- (o) 用于直接销售目的;
- (p) to help detect, prevent, investigate, and prosecute fraud and/or other criminal activity, and share this data with legal, compliance, risk and managerial staff to assess suspicious activities, and against fraud, breach of confidence or theft of proprietary materials; and/or
- (p) 帮助发现、预防、调查和起诉欺诈和/或其他犯罪活动, 并与法律、合规、风险和管理人员分享这些资料, 以评估可疑活动、防止欺诈、泄密或盗窃专有材料; 和/或

D Where you otherwise consent to the processing of personal data for any other specific purpose.

D 如你同意为任何其他特定目的而处理个人资料。

As a data controller, the Company will only use your personal data for the purposes for which the Company collected it. If the Company needs to use your personal data for an unrelated purpose, the Company will contact you.

作为资料控制人, 本公司只会将你的个人资料用于本公司收集资料的目的。如果本公司需要将您的个人资料用于不相关的目的, 本公司将与您联系。

Automated decision-making: The Company does not envisage that any decisions will be taken about you using fully automated means, however the Company will notify you in writing if this position changes.

自动化决策权：本公司不打算使用完全自动化的方式对您做出任何决定，但如果此职位发生变化，本公司将以书面形式通知您。

Disclosure of personal data: It is anticipated that the Company will share your personal data with the Authorised Entities for the purposes set out in this Cayman Privacy Notice as well as service providers (e.g. auditors, legal counsel and tax advisers) to the Company relating to or in connection with business of the Company. The Company may also share relevant personal data where it is lawful to do so and necessary to comply with its contractual obligations or your instructions or where it is necessary or desirable to do so in connection with any regulatory reporting obligations. In exceptional circumstances, the Company will share your personal data with regulatory, prosecuting and other governmental agencies or departments, and parties to litigation (whether pending or threatened), in any country or territory including to any other person where the Company has a public or legal duty to do so (e.g. to assist with detecting and preventing fraud, tax evasion and financial crime or compliance with a court order). At times, it may also be necessary to share relevant personal data with (i) a prospective service provider of the Company including one which is replacing an existing service provider or (ii) people or companies where required in connection with a potential or actual corporate restructuring, merger, acquisition or takeover of the Company.

披露个人资料：预计本公司将为本开曼隐私通知所述目的与授权实体以及与本公司业务相关的服务提供商（如审计师，法律顾问和税务顾问）共享您的个人资料。本公司也可以在符合其合同义务或您的指示的情况下，或在与任何监管报告义务相关的情况下，分享相关的个人资料。在特殊情况下，本公司将与任何国家或地区的监管，起诉和其他政府机构或部门以及诉讼当事人（不论未决或威胁）共享您的个人资料，包括本公司负有公共或法律责任的任何其他人（例如，协助侦查和防止欺诈，逃税和金融犯罪或遵守法院命令）共享您的个人资料。有时，可能还需要与（i）公司的潜在服务提供商（包括替代现有服务提供商的服务提供商）或（ii）与公司潜在或实际的公司重组，合并，收购或接管相关的人员或公司共享相关个人资料。

The Company will not sell your personal data. Any transfer of personal data outside of the Cayman Islands shall be in accordance with the requirements of the DPL. Where necessary, the Company will ensure that separate and appropriate legal agreements are put in place with the recipient of that data. For example, where data is to be transferred to a person in a country which does not provide an adequate level of data protection, the Company will ensure it puts in place appropriate safeguards, such as contracts which seek to ensure that any data processor is contractually bound to provide an adequate level of protection in respect of the personal data transferred to it and that any such transfer complies with the requirements of the DPL.

本公司不会出售你的个人资料。在开曼群岛以外的任何个人资料转移都应符合 DPL 的要求。必要时，公司将确保与该资料的接受方签订单独和适当的法律协议。例如，如果资料要转移给一个没有提供足够资料保护的国家的人，该公司会确保有适当的保障措施，例如订立合约，以确保任何资料处理者在合约上有责任为转移给它的个人资料提供足够的保护，以及确保任何此类转移符合 DPL 的规定。

Your rights: You have certain rights under the DPL, including:

用户权利：根据 DPL，您拥有某些权利，包括：

- (a) the right to be informed as to how the Company collects and uses your personal data;
- (a) 被告知公司如何收集和使用你的个人资料的权利；

- (b) the right to obtain a copy of your personal data;
(b) 获取个人资料副本的权利;
- (c) the right to require the Company to stop direct marketing;
(c) 要求公司停止直营的权利;
- (d) the right to have inaccurate or incomplete personal data corrected;
(d) 更正不准确或不完整的个人资料的权利;
- (e) the right to withdraw your consent and require the Company to stop processing or restrict the processing, or not begin the processing, of your personal data;
(e) 撤回你的同意及要求本公司停止处理或限制处理, 或不开始处理你的个人资料的权利;
- (f) the right to be notified of a data breach (unless the breach is unlikely to be prejudicial);
(f) 在资料被破坏时获得通知的权利 (除非该破坏不大可能是有害的);
- (g) the right to obtain information as to any countries or territories outside the Cayman Islands to which the Company, whether directly or indirectly, transfers, intends to transfer or wishes to transfer your personal data, general measures the Company takes to ensure the security of personal data and any information available to the Company as to the source of your personal data,
(g) 有权获得有关开曼群岛以外的任何国家或地区的信息, 而该国家或地区是本公司直接或间接转让, 打算转让或希望转让您的个人资料的, 本公司为确保个人资料的安全而采取的一般措施, 以及本公司可获得的关于您的个人资料来源的任何信息,
- (h) the right to complain to the Office of the Ombudsman of the Cayman Islands. You can access their website here: ombudsman.ky; and
(h) 向开曼群岛监察员办公室投诉的权利。您可以访问他们的网站: Ombudsman.ky; 以及
- (i) the right to require the Company to delete your personal data in some limited circumstances.
(i) 在一些有限的情况下要求公司删除你的个人资料的权利。

Please note that if you do not wish to provide the Company with requested personal data or subsequently withdraw your consent, you may not be able to become a Customer of the Company or remain a Customer as it will affect the ability of the Company or its service providers to provide services to you.

请注意, 如阁下不欲向本公司提供所要求的个人资料或其后撤回同意, 阁下可能无法成为本公司的客户或继续成为客户, 因为这会影响本公司或其服务供应商向阁下提供服务的能力。

Retention of Personal Data: The personal data shall not be held by the Company for longer than necessary with regard to the purposes of the data processing.

保留个人资料: 本公司持有个人资料的时间不得超过处理资料所需的时间。

Changes to Cayman Privacy Notice: The Company encourages you to regularly review this and any updated Cayman Privacy Notice to ensure that you are always aware of how personal data is collected, used, stored and disclosed.

开曼隐私通知的变更: 本公司鼓励您定期审阅本通知和任何更新的开曼隐私通知, 以确保您始终了解个人资料是如何收集, 使用, 存储和披露的。

Contact us: Please contact the Company if you have any questions about this Cayman Privacy Notice, the personal data the Company holds about you or to discuss your data protection rights.

联系我们: 如果您对本开曼隐私通知, 本公司持有的有关您的个人资料或讨论您的资料保护权利有任何疑问, 请与本公司联系。