

Privacy Policy

Statement of Privacy Policy

At Manulife Financial, the protection of personal information of our customers is important to us. As a provider of financial products and services, the collection and use of the personal information of our customers is fundamental to our daily business operations. Manulife Financial is also concerned about the personal information of its employees and representatives.

Therefore, we pledge to meet fully, and where possible exceed, internationally recognized standards of personal data privacy protection, in complying with the requirements of the Personal Data (Privacy) Ordinance in respect of the collection, use, retention and disclosure of personal information. Each Manulife Financial company, employee and representative must abide by our commitment to privacy in the handling of personal information.

We are committed to providing quality financial products and services in a manner that fosters trust and confidence among our customers, employees and representatives. We adhere to the following principles when dealing with personal information:

- minimize intrusiveness
- maximize fairness in our use of personal information
- protect privacy and confidentiality
- maintain accurate records
- provide accessibility to our privacy policies and customer information when appropriate
- comply with the applicable privacy laws and regulations

In general, without notice on the relevant screens, no personal data will be collected from customers through our website for promotional or marketing purposes. Encryption techniques have been applied to ensure secured data transmission in certain cases as specified in our website.

Since our company in Hong Kong provides various products and services this policy may not reflect all privacy policy statement requirements. For further information please see below:

Manulife (International) Limited

Policies and Practices on Personal Data

As a provider of insurance and financial services, the collection and use of personal data is fundamental to the administration of your individual or group policy, the evaluation of your insurance and financial need, and the provision of services to you. Manulife (International) Limited ("MIL") will at all times observe the Personal Data (Privacy) Ordinance in the collection, maintenance and use of personal data of our clients. In particular, we will ensure that:

- only proper and legitimate means are employed to collect personal data
- personal data collected and used is accurate and timely
- our use of personal data is consistent with the Ordinance and contractual obligations

- personal data is protected by appropriate safeguards and made available only to authorized persons, and
- clients have the right to access and request correction of their personal data

At MIL, we collect and hold personal data of our clients in relation to their personal and policy particulars, medical and occupation history, financial, avocational and claims information. This data is collected by MIL for the purposes of:

- approving and administering the client's policy
- underwriting and reinsuring the risk, and processing claims
- statistical or actuarial research performed by our company, our associated companies or the insurance industry, and
- promotional offers of new or additional service

Should you prefer not to receive our promotional offers or if you wish to access and or correct any personal data, please send your request in writing to:

The Privacy Officer
 Manulife (International) Limited
 22/F, Tower A, Manulife Financial Centre
 223-231 Wai Yip Street, Kwun Tong
 Kowloon, Hong Kong

Manulife Asset Management (Hong Kong) Limited
Policies and Practices on Personal Data

As a provider of mutual funds and unit trusts, the collection and use of personal data is fundamental to the administration of your investment, the evaluation of your financial need, and the provision of services to you. Manulife Asset Management (Hong Kong) Limited ("MAM") will at times to observe the Personal Data (Privacy) Ordinance in the collection maintenance and use of personal data of our clients. In particular, we will ensure that

- only proper and legitimate means are employed to collect personal data
- personal data collected and used is accurate and timely
- our use of personal data is consistent with the Ordinance and contractual obligations
- personal data is protected by appropriate safeguards and made available only to authorized persons, and
- clients have the right to access and request correction of their personal data

At MAM, we collect and hold personal data of our clients in relation to their personal particulars and financial information. This data is collected by MAM for the purposes of:

- approving and administering the client's account
- statistical research performed by our company, our associated companies or the investment funds industry, and
- promotional offers of new or additional service

Should you prefer not to receive our promotional offers or if you wish to access and/ or correct any personal data, please send your request in writing to:

The Privacy Officer
Manulife Asset Management (Hong Kong) Limited
22/F, Tower A, Manulife Financial Centre
223-231 Wai Yip Street, Kwun Tong
Kowloon, Hong Kong

Manulife Provident Funds Trust Company Limited
Policies and Practices on Personal Data

As a provider of mandatory provident fund schemes, the collection and use of personal data is fundamental for Manulife Provident Funds Trust Company Limited (the "MPFTC"), and its delegates, service providers or designated MPF Intermediaries (collectively "service providers") to administer your sub-scheme and provide services to you. In addition, the Mandatory Provident Fund Schemes Authority and other regulatory bodies can inspect any of your information under the sub-scheme. MPFTC and its service providers will at all times observe the Personal Data (Privacy) Ordinance in the collection, maintenance and use of personal data of our clients. In particular, we will ensure that:

- only proper and legitimate means are employed to collect personal data
- personal data collected and used is accurate and timely
- our use of personal data is consistent and in compliance with the Personal Data (Privacy) Ordinance, the Mandatory Provident Fund Schemes Ordinance and contractual obligations
- personal data is protected by appropriate safeguards and made available only to authorized persons, and
- clients have the right to access and request correction of their personal data

MPFTC and its service providers collect and hold personal data of our clients in relation to their personal and sub-scheme particulars, contribution and relevant income information. This data is collected by MPFTC and its service providers for the purposes of:

- administering the client's sub-scheme
- authenticating the Manulife Customer Number for providing a series of electronic services to inquire or/and process your scheme member account
- statistical or actuarial research performed by our company, our associated companies or the provident fund industry, and
- promotional offers of new or additional service

Should you prefer not to receive promotional offers from MPFTC and its service providers or if you wish to access and or correct any personal data, please send your request in writing to:

The Privacy Officer
Manulife Provident Funds Trust Company Limited
22/F, Tower A, Manulife Financial Centre
223-231 Wai Yip Street, Kwun Tong
Kowloon, Hong Kong

Personal Information Collection Statement for Manulife Dialogue

Notice to Customers relating to the Personal Data (Privacy) Ordinance

Definitions

1. **“Data access request”, “data correction request”, “data subject”, “data user”, “direct marketing”, “matching procedures” and “personal data”** used throughout this Notice shall have the meaning as defined in the Ordinance.

For the purpose of this Notice:

“Customers” shall mean data subjects and include (but not be limited to) existing and prospective insurance policy owners, insured, beneficiaries and other persons designated or entitled to receive moneys and/or other benefits under an insurance policy; and members under an occupational retirement scheme; and scheme members under a mandatory provident fund scheme; and share/unit holders of investment funds.

“Hong Kong” shall mean the Hong Kong Special Administrative Region.

“Manulife” shall mean Manulife (International) Limited, Manulife Provident Funds Trust Company Limited, Manulife Asset Management (Hong Kong) Limited, or a Manulife Fund (as the case may be) in respect of its respective customers.

“Manulife Fund” shall mean any investment fund sponsored or managed from time to time by a member of the Manulife Group (including but not limited to Manulife Global Fund and Manulife Advanced Fund SPC) and **“Manulife Funds”** shall mean all such investment funds.

“Manulife Group” shall mean Manulife Financial Corporation and its subsidiaries and affiliates (including but not limited to Manulife (International) Limited, Manulife Provident Funds Trust Company Limited, Manulife Asset Management (Hong Kong) Limited), and Manulife Funds. The rights and obligations of each member of Manulife Group under this Notice are several and not joint. No member of Manulife Group shall be liable for an act or omission by another member of Manulife Group.

“Ordinance” shall mean Personal Data (Privacy) Ordinance.

Collection

2. For registration as a Manulife Dialogue member, it is necessary for customers to volunteer Manulife with personal data for purposes of statistics and research. . Failure to supply such data may result in Manulife being unable to establish or continue the Manulife Dialogue membership.
3. We may also collect data for the purposes of communications with customers and/or users of this website.

4. We may collect aggregate data that does not allow you to be identified. This information helps us better understand your needs and adapt our products and services. We may share aggregate data with third parties, including for advertising and marketing purposes.
5. When you access this Website, anonymous technical information may be collected about your activities on the Website (e.g. your IP address, the date and time that you accessed the Website, information relating to your browser and operating system, the pages visited etc.).
6. Manulife may use "cookies" (pieces of information relating to your preferences sent by the Website to your browser and stored on your computer hard-drive). Cookies enable the Website to remember you and your preferences when you visit the Website and enable us to tailor the website to your needs. Cookies do not identify you personally. However, if you do not want to receive cookies you can disable this function by changing your browser settings.
7. Manulife shall keep your personal information for as long as necessary to achieve the purpose for which it was collected and to comply with legal requirements. If Manulife no longer needs your personal information for any purpose, it will take reasonable steps to securely delete or destroy your personal information.

Purposes

4. The purposes for which personal data of a customer may be used in Manulife Dialogue may include the following:
 - a. understanding customer's financial situation, desires, and needs better;;
 - b. researching and/or designing products and/or services for customers, and promoting, improving and furthering the provision of products and/or services;
 - c. complying with any contractual or other commitment or arrangement with local or foreign regulators, governmental bodies, or industry recognised bodies (whether within or outside Hong Kong) that is assumed by or imposed on Manulife or any member of Manulife Group by reason of its financial, commercial, business or other interests or activities in or related to the jurisdiction of the relevant local or foreign regulators, governmental bodies, or industry recognised bodies;
 - d. for operational purposes, statistical analysis (including in each case, behaviour analysis and evaluation on the overall relationship with Manulife Group which includes using such data to comply with any obligations, requirements, policies, procedures, measures or arrangements for sharing data and information within Manulife Group and/or other use of data and information in accordance with any Manulife Group-wide programmes for compliance with sanctions or prevention or detection of money laundering, terrorist financing or other unlawful activities), whether on the data subjects or otherwise;
 - e. exercising any rights Manulife may have in connection with the provision to customers of products and/or services;
 - f. any purposes relating to the above (including seeking professional advices) or any other purposes in accordance with the general policies of Manulife or any member of Manulife Group in relation to insurance, occupational retirement schemes, mandatory provident fund schemes, investment funds, wealth management services and other

financial products and services as set out in notices, circulars, or other terms and conditions made available by Manulife or any member of Manulife Group to customers from time to time.

Transferees

5. Personal data of a customer held by Manulife will be kept confidential but Manulife may transfer such data to the following persons and/or entities (whether within or outside Hong Kong) for any of the purposes set out in paragraph 4 above:
 - a. any agent, contractor or third party service provider who provides administrative, telecommunications, computer, information technology, payment, data processing or storage, marketing, mailing, printing, telemarketing, customer satisfaction analysis, or other services to Manulife or any member of Manulife Group in connection with the operation of business, including any custodian, administrator, investment manager, investment advisor or distributor;
 - b. any advisor (including his or her employees) or other intermediary (including their employees);
 - c. any person which has undertaken to Manulife or any member of Manulife Group to keep such data confidential;
 - d. any actual or proposed assignee, transferee, participant or sub-participant of the rights or business of Manulife or Manulife Group;
 - e. any member of Manulife Group;
 - f. any person to whom Manulife or any member of Manulife Group is under an obligation or otherwise required to make disclosure under the requirements of any law, rules, regulations, codes of practice, guidelines or guidances binding on or applicable to Manulife or any member of Manulife Group including but not limited to any local or foreign regulators, governmental bodies, or industry recognised bodies;
 - g. any person to whom Manulife or any member of Manulife Group is under an obligation or otherwise required to make disclosure pursuant to any contractual or other commitment or arrangement with local or foreign regulators, governmental bodies, or industry recognised bodies (whether within or outside Hong Kong) that is assumed by or imposed on Manulife or any member of Manulife Group by reason of its financial, commercial, business or other interests or activities in or related to the jurisdiction of the relevant local or foreign regulators, governmental bodies, industry recognised bodies.

Data Access

6. Under the Ordinance, a data subject has the right to:
 - a. request access to his or her personal data;
 - b. request correction of any of his or her personal data which is inaccurate;
 - c. ascertain a data user's policies and practices in relation to personal data;
 - d. be informed of the kind of personal data held by the data user;
 - e. be informed of the main purposes for which personal data held by the data user are or are to be used;

- f. make data access request and data correction request through the channel set out in paragraph 9 below.
- 7. In accordance with the provisions of the Ordinance, Manulife has the right to charge a reasonable fee for processing any data access request. Requests may be made in writing to:

Business Intelligence Senior Director
Manulife (International) Limited
22/F., Tower A, Manulife Financial Centre, 223-231 Wai Yip Street,
Kwun Tong, Kowloon, Hong Kong