



## Privacy Policy Statement

Personal data is any information that can be used to identify you. For Mox (Mox/we/us), your personal data is very important. What we can learn from or about you helps us to deliver smart banking to you.

We're the protector of your data. This Privacy Policy Statement sets out the policies and practices which highlight our commitment to protecting the privacy of your personal data in accordance with the Personal Data (Privacy) Ordinance (Cap. 486).

You should read this Privacy Policy Statement alongside our Personal Information Collection Statement, which details why and how we use your personal data and who we share it with.

After reading this Privacy Policy Statement if you have any questions, please ask us anytime!

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### 1. What Information of Yours Do We Hold and Who Do We Collect It from?

#### Information Submitted by You:

- Identity data means your personal information you give to us when you apply for our products or services, or enter a Mox competition or game, e.g. your name, date of birth, identity card number, correspondence address, phone number, email address, nationality, credit-related information or even other data such as selfies.
- Communications data includes how you want us to contact you and your preferences for the marketing we send you.

#### Information We Collect about You and Your Device:

- Financial data includes your Mox Card number, transactions conducted through your Mox Account, Mox Invest Account or any of your Goal accounts and any data on other Mox products and services you use.
- Technical data means details such as your mobile network, operating system, IP address, and the settings and technology on your mobile phone.
- Usage data includes information about how you use our website, the Mox app and products and services.

#### Information from You (or Created by You) Which You May Give Us Permission to See, for the Purposes of Providing Products or Services to You:

- Your contacts list, to facilitate payments and transactions between you and your contacts.
- Your geolocation, to help you onboard as a Mox customer and for other security and compliance checks while using our products and services.
- Your facial image data from your camera, to help you onboard as a Mox customer and so that we can confirm your identity.

- Information that you may provide to us, including information that you may post on our website and social network sites, to enable us to communicate with you and to provide products and services to you.

### **Information from Third Parties Which Helps Us Deliver Our Products and Services:**

- General due diligence includes data that the law requires us to process about you in relation to illegal activities involving money.
- Financial due diligence includes data we receive from credit reference agencies to help with responsible lending decisions.

Sometimes we will aggregate information. This means we will combine information from groups of customers to create a profile group for research, analysis or to help with general marketing. Aggregated data will not show your identity, but if we end up connecting this to you personally, then we will protect that data in the way stated in this Privacy Policy Statement.

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## **2. How Do We Protect Your Data?**

Some of the security measures we use to protect your data include:

- Firewalls – like a security guard whose job it is to decide who can access a building, firewalls proactively block certain information flows to our app by screening the flows based on a set of rules that Mox will set.
- Intrusion detection systems (“IDS”) – like a security camera, IDS monitor information flows for patterns of activity that don’t look normal and might signal an attack on our app.
- 24/7 physical protection of facilities where your data is stored.
- Background checks on people that need access to those physical facilities to do their job.

We also use digital signatures and encryption. Encryption changes your data into a code that can only be read by Mox and some of our trusted partners who need access to it. We always encrypt your data using the highest standards of security technology.

Encryption helps to ensure:

- we can confirm the identity of the user;
- we can prove that a transaction took place on the instruction of a specific person;
- we can make sure that personal data is kept private by keeping the information hidden; and
- we can ensure that the personal data was not changed during transfer or storage by someone without authority.

We always need your help to keep your data secure. Please let us know immediately if your data may have been lost or stolen, or if you think someone has used it without your permission.

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### **3. Automated Decisions and Profiling**

We may use algorithms when considering and processing your application for Mox products and services. The algorithms provide automatic assessments and decisions based on the personal data collected in accordance with our PICS. The parameters used in these assessments have been selected to provide a fair and objective assessment of your personal data and have been tested for reliability and fairness. If we are uncertain about the accuracy of the personal data that will be used in an algorithmic assessment, we may ask you to clarify any such personal data.

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### **4. Enquiries**

At Mox, we pride ourselves on putting the customer first. So, if you need any additional information about our privacy policies and practices or if you have a complaint then please give us a chance to put things right by messaging us through the Mox app, sending an email ([care@mox.com](mailto:care@mox.com)), giving us a call (tel: +852 2888 8228) or reaching us by post (address: Data Protection Officer, 39/F., Oxford House, Taikoo Place, 979 King's Road, Quarry Bay, Hong Kong).

You can also refer your complaint to the Hong Kong Monetary Authority or the Office of the Privacy Commissioner for Personal Data.

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### **5. Linked Websites**

This policy does not apply to third-party websites where our online advertisements are displayed or to linked third-party websites which we do not operate or control.

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### **6. Changes to this Privacy Policy Statement**

Sometimes, we'll need to update our Privacy Policy Statement. You can find the latest version on our website and the Mox app.

The English version prevails if there is any inconsistency between the English and Chinese versions of any of this Privacy Policy Statement.

Last updated: 28 November 2023

## 私隱政策聲明

個人資料是用以識別您的任何資料。Mox (Mox/我們) 非常重視您的個人資料。對您更深入的理解可以讓我們為您提供智慧高效的銀行服務。

我們是您的資料保護者。本私隱政策聲明載列我們根據《個人資料(私隱)條例》(香港法例第486章) 制訂的政策及措施, 我們強調承諾致力保障您的個人資料。

閱讀本私隱政策聲明時, 請一併閱讀我們的個人資料收集聲明, 該聲明詳述我們為何及如何使用您的個人資料, 以及我們將與誰分享您的資料。

閱讀本私隱政策聲明後, 如有任何問題, 請隨時聯絡我們!

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### 1. 我們持有您的哪些資料?我們從何收集您的資料?

#### 您提交的資料:

- 身分資料指您申請我們的產品或服務, 或參加 Mox 的比賽或遊戲時, 向我們提供的個人資料, 例如您的姓名、出生日期、身分證號碼、通訊地址、電話號碼、電郵地址、國籍、信貸相關資料, 或甚至自拍照等其他資料。
- 通訊資料包括您希望我們如何聯絡您, 及您對於我們如何發送的市場推廣資料的喜好。

#### 我們收集有關您及您的裝置的資料:

- 財務資料包括您的 Mox 卡號碼、透過您的 Mox 戶口、Mox Invest 戶口或任何目標戶口進行的交易及您使用的其他 Mox 產品及服務的任何資料。
- 技術資料指您的流動網絡、操作系統、IP 地址、及流動電話的設定及技術等詳細資料。
- 用途資料包括您如何使用我們的網站、Mox 應用程式、產品及服務的相關資料。

#### 您可能准許我們檢閱由您提供 (或由您建立) 的資料, 用以向您提供產品或服務:

- 您的通訊錄, 以便您與聯絡人之間進行付款及交易。
- 您的所在位置, 以助您成為 Mox 客戶, 並於使用我們的產品及服務之時進行其他保安及合規審查。

- 來自您相機的您的容貌圖像資料，以助您成為 Mox 客戶，並讓我們核實您的身份。
- 您可能向我們提供的資料（包括您可能於我們的網站或社交網絡發表的資料），讓我們可聯絡您，並為您提供產品及服務。

#### **有助我們提供產品及服務，來自第三方的資料：**

- 一般盡職審查包括就涉及金錢的非法活動，法律要求我們處理有關您的資料。
- 財務盡職審查包括我們從信貸資料服務機構收集的資料，以協助我們作出負責任的借貸決定。

我們有時會匯集資料。這表示我們會合併從不同的客戶組別收集的資料，以建立分析組別用以研究、分析或協助一般的市場推廣。匯集後的數據不會顯示您的身分，但如我們隨後將數據與您的個人身分連繫，我們會以本私隱政策聲明所述方式保障有關資料。

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## **2. 我們如何保護您的資料？**

我們用以保護您的資料的保安措施包括：

- 防火牆 – 正如一名負責決定誰可進入大廈的保安員，防火牆根據 Mox 制定的規則篩選流量，並主動攔截特定的資訊流動進入我們的應用程式。
- 入侵檢測系統（「IDS」） – 正如監控鏡頭，IDS 密切監視資訊流動，並檢測看似不尋常的活動模式或有可能攻擊我們的應用程式的資訊流動。
- 每日 24 小時全天候保護儲存您的資料的實體設施。
- 對因其崗位而需要進入這些實體設施的人士進行背景檢查。

我們亦使用數碼簽署及加密。加密會將您的資料轉換為代碼，而這些代碼只有 Mox 及一部分 Mox 信任而且有需要取用資料的合作夥伴才能閱讀。我們會一直以最高水平的保安技術加密您的資料。

加密有助：

- 確認用戶的身分；
- 證明一項交易是按一名可識別人士的指示執行；

