

Privacy Policy – General

1. Introduction

This Privacy Policy (“Policy”) describes what information we collect about you, how we’ll use that information, who we’ll share it with, the circumstances when we’ll share it, and what steps we’ll take to make sure it stays private and secure.

NOTATIONS & EXPLANATIONS

When this policy mentions “**Lynchpin,**” “**we,**” “**us,**” or “**our,**” it refers to Lynchpin Bondholder Management Limited who is responsible for your information under this Privacy Policy (the “**Data Controller**”).

Wherever we’ve said ‘you’ or ‘your’, this means you, any authorized person on your account, anyone who handles your bond management, or deals with us for you (e.g. trustees or executors, attorneys under a Power of Attorney) and other related people (including authorized signatories, partners, members and trustees).

2. Information we may collect

2.1 Information that you provide to us

- Personal information, e.g. name, previous names
- Business information, e.g. company name, business title and associated contact information
- Contact information, e.g. mailing address, email address, landline and mobile numbers, fax numbers
- Settlement *details and bond information*, e.g. name of bank, bank account number, original face *value of bonds, blocking reference number*
- *Noteholder and Account Holder names and details, including clearing house information and contacts*

2.2 Information we collect or generate about you

- *Usage Information.* We collect information about your interactions with the Lynchpin website such as the pages or content you view, and other actions on Lynchpin website.
- *Web Beacons.* Pages of our Websites may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).
- *Web Analytic Tools.* Our Websites may use Google Analytics or similar web analytics tools that help website owners analyze the traffic to their websites. By using Google Analytics, the Company may be able to view a variety of reports about how users interact with the Websites, which can be used to improve your user experience and the overall quality of the Websites.

2.3 Information we collect from other sources

- *Information you've asked us to collect for you, e.g. information about your accounts or holdings with other companies including transaction information;*
- *Information from third party providers, e.g. Clearing houses and account holders*

3. How we use information we collect

We use personal information that we collect about you or that you provide to us, including any personal information:

- To respond to your inquiries and fulfill your requests.
- To provide liability management execution services regarding your holding of issuer debt including validating your position to you and to our issuer clients.
- To provide you with notices about schemes of arrangement, bondholder identifications, exchanges, etc.
- To fulfill any other purpose for which you provide it.
- To present our Websites and its contents to you.
- To inform you about information regarding the Website, and/or other administrative information.
- To verify your identity and/or location (or the identity or location of your representative or agent) in order to maintain measures aimed at preventing fraud and protecting the security of account and personal information.
- To allow you to participate in interactive features on our Websites, including information gathering on behalf of our issuer clients.
- To help us to improve our Websites and to deliver a better and more useful experience to our clients and users.
- For risk control, fraud detection and prevention, to comply with laws and regulations, and to comply with other legal process and law enforcement requirements.
- To comply with a legal obligation or to carry out a legitimate interest that we or a third party may have.
- In any other way we may describe when requesting information.

4. Who we might share your information with

We may share your information with others where lawful to do so including where we, or they:

- have need, to complete a service, e.g. fulfill and settlement request;
- have a public or legal duty to do so, e.g. to assist with detecting and preventing fraud, tax evasion and financial crime;
- have need, in connection with regulatory reporting, litigation, or asserting, or defending legal rights and interests;
- have a legitimate business reason for doing so, e.g. to manage risk, verify your identity, enable another company to provide you with services you've requested, or assess your suitability for services;
- have asked you for your permission to share it, and you've agreed.

We may share your information for these purposes with others including:

- any sub-contractors, agents or service providers who work for us or
- provide services to us (including their employees, sub-contractors, service providers, directors and officers);
- any joint account holders, trustees, beneficiaries or executors;

- people you make payments to and receive payments from;
- your beneficiaries, intermediaries, correspondent and agent banks, clearing houses, clearing or settlement systems, market counterparties and any companies you hold securities in through us, e.g. bonds and shares;
- other financial institutions, tax authorities, information agencies were permitted to do so;
- any fund managers who provide asset management services to you and any brokers who deal with us for you and with respect to your bondholding;
- compliance with Hong Kong regulations regarding anti-money laundering and know your customers rules
- law enforcement, government, courts, dispute resolution bodies, our regulators, auditors and any party appointed or requested by our regulators to carry out investigations or audits of our activities;
- fraud prevention agencies who'll also use it to detect and prevent fraud and other financial crime and to verify your identity;
- anyone who provides instructions or operates any of your accounts on your behalf, e.g. Power of Attorney, solicitors, intermediaries, etc;
- anybody else that we've been instructed to share your information with by either you, a joint account holder or anybody else who provides instructions or operates any of your accounts on your behalf;

5. How long we'll keep your information

Subject to any legal, statutory, regulatory or accounting requirements, the Personal Data you provide to us will be kept by us in the appropriate form only for as long as is necessary to fulfil the purposes mentioned above. Upon expiration of the applicable retention period generally five years, we will securely destroy your personal information in accordance with applicable law and regulation.

6. How we use cookies

We use cookies to ensure that we give you the best experience on our website. If you continue to use this site, we will assume that you are happy with it.

Cookies are text files placed on your computer to collect standard internet log information and visitor behavior information. This information is used to track visitor use of the website and to compile statistical reports on website activity. For further information visit www.aboutcookies.org or www.allaboutcookies.org

You can set your browser not to accept cookies and the above websites tell you how to remove cookies from your browsers. However, in a few cases some of our website features may not function as a result.

Lynchpin Bondholder Management Limited may also collect information that is not personal information, because it does not identify you or anyone else, such as anonymous answers to surveys or aggregated information about how users utilize Lynchpin website.

7. Your rights

The new regulations provide individuals more rights regarding their personal data. There are certain circumstances that your rights apply to and if you wish to exercise any of the below we can let you know whether these apply or not.

Your rights include:

- The right to be informed about the processing of your data and how it is collected and used
- The right to rectify your data if it is found to be incorrect or incomplete
- The right to have your personal data deleted (the 'right to be forgotten')
- The right to restrict processing of your personal data

- The right to data portability (to move, copy or transfer your personal information)
- The right to object to the processing of your personal data
- Rights in relation to automated decision making and profiling which has a legal effect or will significantly affect you

If the processing of your personal data has been based on consent you have the right to withdraw this at any point. To do this, please contact us.

8. Security - How we keep your information secure

To prevent loss, unauthorized access, use or disclosure and to ensure the appropriate use of your information, we utilize reasonable and appropriate physical, technical, and administrative procedures to safeguard the information we collect and process. We implement security safeguards designed to protect your data, such as HTTPS.

9. Changes to the Policy

It is our policy to post any changes we make to our Policy on this page. If we make material changes to how we treat our users' personal information, we will notify you through a notice on the Website. The date the Policy was last revised is identified at the foot of the policy notice. You are responsible for periodically visiting our Websites and this Policy to check for any changes.

10. Contact us

To ask questions or comment about this Policy and our privacy practices, please find our contact information as below.

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