

Winton Financial Limited (the “Company”)
Notice to Employees and Employment Applicants relating to the
Personal Data (Privacy) Ordinance (the “Ordinance”)

1. It is necessary for applicants for employment with the Company (the “Applicants”) to supply the Company with data about themselves in connection with their application.
2. Failure to supply such data will result in the Company being unable to process employment applications.
3. If the application for employment is not successful, data about the Applicants may be retained for a maximum period of one year from the date when the application for employment is rejected and such data may be retained for a longer period if there is a subsisting reason that obliges the Company to do so.

If an application for employment is successful, data about employees may also be collected from employees during the period of their employment with the Company. Data about employees may be retained for a maximum period of seven years from the date when the employees cease employment with the Company, and for a longer period if there is a subsisting reason that obliges the Company to do so.

4. The purposes for which data relating to employees and the Applicants may be used are as follows:-
 - a) processing employment applications;
 - b) determining and reviewing terms and conditions of employment such as salaries, bonuses and other benefits;
 - c) consideration for promotion, training, secondment or transfer;
 - d) consideration of eligibility for and administration of staff loans and other benefits and entitlements;
 - e) providing employee references; and
 - f) monitoring compliance with internal rules of the Company, and meeting statutory requirements of any laws binding on the Company and for the purposes of any guidelines or regulations issued by regulatory or other authorities with which the Company is expected to comply.
5. Data held by the Company relating to the Applicants and employees will be kept confidential but the Company may provide such information to:-
 - a) any agent, contractor, service provider or other third party who provides administration, telecommunications, computer, human resources management or other services to the Company in connection with the operation of its business;
 - b) any entity within the Company;
 - c) any other person under a duty of confidentiality to the Company including Public Bank Berhad, Malaysia, the ultimate holding company of the Company, and its subsidiaries, which has undertaken to keep such information confidential;
 - d) persons seeking employee references in respect of employees with the prescribed consent of the employee concerned in accordance with the Ordinance;
 - e) any person to whom the Company is under an obligation to make disclosure under the requirements of any law binding on the Company and for which the purposes of any guidelines or regulations issued by regulatory or other authorities with which the Company is expected to comply; and
 - f) any actual or proposed purchaser of all or part of the business of the Company or, in the case of any merger, acquisition or other public offering, the purchaser or subscriber for shares in the Company.
6. Under and in accordance with the terms of the Ordinance any individual:-
 - a) has the right to check whether the Company holds personal data about him/her and the right of access to such data;
 - b) has the right to require the Company to correct any personal data relating to him/her which is inaccurate;
 - c) has the right to ascertain the Company’s policies and practices in relation to personal data and to be informed of the kind of personal data held by the Company.
7. In accordance with the terms of the Ordinance, the Company has the right to charge a reasonable fee for the processing of any data access request.
8. The person to whom requests for access to data or correction of data or for information regarding policies and practices and kinds of data held are to be addressed as follows:-

Human Resources Manager
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