Personal Information Collection Statement

Collection of Personal Data

In connection with TransPacific's provision of private placement services to fund managers - including the introduction of potential institutional investors to these managers, and the ongoing development of new relationships with both fund managers and institutional investors, TransPacific may require representatives from such groups to supply TransPacific with data about themselves and their organization.

Such data may include, but not be limited to, proof of a representative's identity, proof of address, other contact details, and proof of authority to enter into relevant transactions.

Purpose for Data Collection

The purposes for which personal data may be used include:

(i)   The provision of fund private placement services to the fund manager in accordance with the instructions of the fund manager client;

(ii)   Meeting the relevant regulatory and legal requirements to conduct client and investor identification and verification, and to make any required disclosures under any applicable law, guideline, or code of practice, include those relating to anti-money laundering, and counter-terrorist-financing;

(iii)   Other purposes specifically provided for in any particular service offered by TransPacific;

Note: If a representative of a manager or investor does not want TransPacific to use his personal data for any of the purposes listed above TransPacific may not be able to provide the fund private placement services requested.

(iv)   Direct marketing of TransPacific services and/or related products.

Note: All direct marketing in relation to TransPacific services and related products to representatives of fund managers and potential investors is sent to them in their official capacity as representatives of the business for whom they work or represent and not in their individual capacity.

The manager's or investor's consent is required for TransPacific to use personal data for any direct marketing.

If the manager or investor advises TransPacific in writing that they do not want TransPacific to use their personal data for such purposes, TransPacific will not so do. Contact details for such an "Opt Out" request are provided below.

Data Sharing

Personal data held by TransPacific relating to a representative of a manager or investor will be kept confidential and not provided to any third party, subject to the following limited exceptions:

(i)   Affiliates of TransPacific;

(ii)   Any regulatory or government agency- including the Hong Kong Securities and Futures Commission, Joint Financial Intelligence Unit- where TransPacific has reason to believe money laundering or serious crime or terrorism may be involved.

(iii)   Where required as part of any legal proceedings

(iv)   any financial or professional adviser representing the manager or investor in connection with those services being provided to the manager or investor by TransPacific;

(v)   any financial institution, business or professional firm with which the manager or investor has or proposes to have dealings related to the services being provided by TransPacific;

Data Access – Checking and Requests

In accordance with the terms of the Personal Data (Privacy) Ordinance ("PDPO") and related guidelines, an individual may:

(i)   check whether TransPacific holds data about them and may request access to such data;

(ii)   request TransPacific to correct any data relating to them which are inaccurate;

(iii)   request TransPacific to specify its policies and practices in relation to personal data, and be informed of the kind of personal data held by TransPacific;

(iv)   request TransPacific to cease using their personal data for its marketing purposes.

Contact regarding Personal Data

Any requests and enquiries regarding Personal Data policies and practices, and specific information held should be addressed in writing to

Managing Director
TransPacific Group (Asia) Limited
15th Floor, Nexxus Building
41 Connaught Road Central
Hong Kong