

PRIVACY NOTICE

MANULIFE ADVANCED FUND SPC

30 September 2019

Manulife Advanced Fund SPC (the "**Company**") is an exempted segregated portfolio company incorporated with limited liability under the laws of the Cayman Islands.

The purpose of this notice (the "**Privacy Notice**") is to provide you with information on our use of your personal data in accordance with the Data Protection Law, 2017 (the "**DPL**").

In this document, "we", "us" and "our" refers to the Company and its affiliates and/or delegates.

If you are an individual investor, this will affect you directly. If you are an institutional investor that provides us with personal data on individuals connected to you for any reason in relation to your investment with us, this will be relevant for those individuals and you should transmit this document to such individuals or otherwise advise them of its content.

In our use of personal data the Company will be characterised as a "data controller" for the purposes of the DPL. The Company's affiliates and delegates may act as "data processors" for the purposes of the DPL.

Your Personal Data

By virtue of making an investment in the Company (including the initial application and ongoing interactions with the persons engaged by the Company) or by virtue of you otherwise providing us with personal information on individuals connected with you as an investor (for example, directors, trustees, employees, representatives, shareholders, investors, clients, beneficial owners or agents), you will provide us with certain personal information which constitutes personal data within the meaning of the DPL. We may also obtain personal data on you from other public accessible directories and sources. This includes information relating to you and/or any individuals connected with you as an investor in the Company such as: name, residential address, email address, contact details, corporate contact information, signature, nationality, place of birth, date of birth, tax identification, credit history, correspondence records, passport number, bank account details, source of funds details and details relating to your investment activity.

How We May Use Your Personal Data

The Company, as the data controller, may collect, store and use your personal data for purposes including the following.

The processing is necessary for the performance of a contract, including:

- administering or managing the Company;
- processing your subscription and investment in the Company, such as entering your information in the register of shareholders and processing redemption and switching orders;
- sending you statements relating to your investment;
- account administration;
- payments of dividends and other distributions to investors;
- facilitating the continuation or termination of the contractual relationship between you and the Company; and

- facilitating the transfer of funds, and administering and facilitating any other transaction, between you and the Company.

The processing is necessary for compliance with applicable legal or regulatory obligations, including:

- undertaking investor due diligence including anti-money laundering and counter-terrorist financing checks, including verifying the identity and addresses of our investors (and, where applicable, their beneficial owners);
- sanctions screening and complying with applicable sanctions and embargo legislation;
- complying with requests from regulatory, governmental, tax and law enforcement authorities;
- tax identification in accordance with applicable legal obligations, including pursuant to the U.S. Foreign Account Tax Compliance Act (“**FATCA**”) and the Organisation for Economic Co-operation and Development’s Common Reporting Standard for the Automatic Exchange of Information (“**CRS**”) and any relevant regulations in connection therewith;
- surveillance and investigation activities;
- carrying out audit checks, and instructing our auditors;
- maintaining statutory registers; and
- preventing and detecting fraud;

In pursuance of our legitimate interests, or those of a third party to whom your personal data are disclosed, including:

- complying with a legal, tax, accounting or regulatory obligation to which we or the third party are subject;
- assessing and processing requests you make;
- sending updates, information and notices or otherwise corresponding with you in connection with your investment in the Company;
- investigating any complaints, or pursuing or defending any claims, proceedings or disputes;
- providing you with, and informing you about investment products and services;
- managing our risk and operations;
- complying with audit requirements;
- ensuring internal compliance with our policies and procedures;
- protecting the Company against fraud, breach of confidence or theft of proprietary materials;
- seeking professional advice, including legal advice;
- facilitating transactions involving the Company, including to verify the identity of the Company;
- monitoring communications to/from us (where permitted by law); and
- protecting the security and integrity of our IT systems.

We will only process your personal data in pursuance of our legitimate interests where we have considered that the processing is necessary and, on balance, our legitimate interests are not overridden by your legitimate interests, rights or freedoms.

The Company continues to be a data controller even though it has engaged the administrator (the “**Administrator**”), sub-administrator, registrar and transfer agent (the “**Sub-Administrator**”), the general adviser and distributor, Manulife Investment Management (Hong Kong) Limited (the “**General Adviser and Distributor**”), distributors and sub-distributors and other third parties to perform certain activities on the Company’s behalf.

Sharing Your Personal Data

We may share your personal data with our delegates. In certain circumstances we may be legally obliged to share your personal data and other financial information with respect to your interest in the Company with relevant regulatory authorities such as the Cayman Islands Monetary Authority or the Tax Information Authority. They, in turn, may exchange this information with foreign authorities, including tax authorities and other applicable regulatory authorities.

We may also share your personal data with any member of the Manulife Financial group, in connection with any internal risk, compliance and reporting and/or administrative services processes and policies.

The Company's delegates and service providers such as the Administrator, the Sub-Administrator, the General Adviser and Distributor, distributors and sub-distributors, are generally processors acting on the instructions of the Company. Additionally, a service provider such as banks, accountants, auditors and lawyers may use your personal data where this is necessary for compliance with a legal obligation to which it is directly subject (for example, to comply with applicable law in the area of anti-money laundering and counter terrorist financing or where mandated by a court order or regulatory sanction). The service provider, in respect of this specific use of personal data, acts as a data controller.

In exceptional circumstances, we will share your personal data with regulatory, prosecuting and other governmental agencies or departments, and parties to litigation (whether pending or threatened) in any country or territory.

Sending Your Personal Data Internationally

Any transfer of your personal data by us or our duly authorised affiliates and/or delegates outside of the Cayman Islands shall be in accordance with the requirements of the DPL.

Retention and Deletion of Your Personal Data

We will keep your personal data for as long as it is required by us. For example, we may require it for our legitimate business purposes, to perform our contractual obligations, or where law or regulation obliges us to. We will generally retain your personal data throughout the lifecycle of the investment you are involved in. Some personal data will be retained after your relationship with us ends. We expect to delete your personal data (at the latest) once there is no longer any legal or regulatory requirement or legitimate business purpose for retaining your personal data.

Automated Decision-Making

We will not take decisions producing legal effects concerning you, or otherwise significantly affecting you, based solely on automated processing of your personal data, unless we have considered the proposed processing in a particular case and concluded in writing that it meets the applicable requirements under the DPL.

Your rights

You have certain data protection rights, including the right to:

- be informed about the purposes for which your personal data are processed;
- access your personal data;
- stop direct marketing;
- restrict the processing of your personal data;
- have incomplete or inaccurate personal data corrected;

- ask us to stop processing your personal data;
- be informed of a personal data breach (unless the breach is unlikely to be prejudicial to you);
- complain to the Ombudsman's office of the Cayman Islands; and
- require us to delete your personal data in some limited circumstances.

Contact us

We are committed to processing your personal data lawfully and to respecting your data protection rights. Please contact us if you have any questions about this Privacy Notice or the personal data we hold about you. Our contact details are Attn: Privacy Officer, 23/F, Manulife Tower, One Bay East, 83 Hoi Bun Road, Kwun Tong, Kowloon, Hong Kong. Please mark your communication "Data Protection Enquiry".

Disclaimer

This Privacy Notice has been translated into Chinese for reference only. If there is any inconsistency between the English version and the Chinese version, the English version shall prevail.