# Privacy and Refund Policy

**Website, enquiry, application and transaction administration policy**

**Banks Instruments Limited | Hong Kong | Draft Template - Not for Execution**

Registered office: Office A 8/F Wing Sing Commercial Centre 12-16 Wing Lok Street Sheung Wan, Hong Kong

Regulatory capacity: any regulated activity described in this template must be performed only under the verified licence or exemption [INSERT], or by the named licensed third-party provider [INSERT]. This template is not an offer, approval, commitment, bank instrument, or executed agreement.

## Scope and status

This policy explains how Banks Instruments Limited collects, uses, stores and shares personal data in connection with its website, enquiries, applications, compliance reviews and transaction administration, and how any fee or refund request is assessed. It should be finalized with verified company, registration, licence, office and privacy-contact particulars before publication as an executed corporate policy.

## Data controller and contact

| Item | Details |
|---|---|
| Entity | Banks Instruments Limited |
| Jurisdiction | Hong Kong |
| Registration and registered office | [INSERT VERIFIED REGISTRATION NUMBER] \| Office A 8/F Wing Sing Commercial Centre 12-16 Wing Lok Street Sheung Wan, Hong Kong |
| General contact | info@banksinstruments.com |
| Compliance and privacy contact | compliance@banksinstruments.com |

## Information collected

- identity, contact, nationality, residence, corporate and beneficial ownership information;
- government identification, address evidence, company records, authority documents and signatures;
- source-of-wealth, source-of-funds, bank, tax-residence and transaction information;
- instrument, asset, custody, ownership, valuation, settlement and bank-verification records;
- sanctions, politically exposed person, adverse-media, litigation and compliance screening results;
- website, device, cookie, security, correspondence, call and support records; and

- professional, banking, provider and counterparty information required to evaluate or administer a transaction.

## Purposes and lawful basis

| Purpose | Typical basis |
|---|---|
| Respond to enquiries and requested services | Steps requested before a contract; legitimate interests |
| KYC, KYB, sanctions and fraud prevention | Legal obligations; public interest; legitimate interests |
| Evaluate, structure and administer transactions | Contract; steps before contract; legitimate interests |
| Authenticate instruments and bank pathways | Contract; legitimate interests; consent where required |
| Security, audit, complaints and legal claims | Legal obligations; legitimate interests |
| Optional communications | Consent or legitimate interests, with opt-out where required |

## Disclosure and cross border processing

Information may be shared on a need-to-know basis with verified banks, custodians, settlement platforms, financing parties, providers, attorneys, trustees, compliance vendors, insurers, auditors, technology suppliers and public authorities with a lawful basis. Because proposed transactions may be international, data may be processed outside Hong Kong. Appropriate contractual, confidentiality and security controls should be used, subject to applicable law and institutional requirements.

## Retention and security

Records are retained only as long as reasonably required for enquiry administration, compliance, contractual, audit, dispute, limitation and legal obligations. Retention periods depend on the record and applicable requirements. Reasonable administrative, technical and physical safeguards are used, but no internet transmission or storage system can be guaranteed completely secure.

## Individual rights

Subject to applicable law and permitted exemptions, a person may request access, correction, deletion, restriction, objection, portability, withdrawal of consent, or information about processing. Identity must be verified before a request is actioned. Hong Kong rights are principally governed by the Personal Data Privacy Ordinance and applicable guidance, as amended.

## Cookies and website analytics

The website may use strictly necessary cookies for security and operation and optional analytics or preference technologies where enabled. A visitor may manage browser settings, although disabling necessary cookies may affect functionality. Any optional cookie or analytics deployment should be documented in the website consent interface.

## Refund principles

Banks Instruments Limited does not charge an upfront monetization fee solely to submit an asset for financing review. Any other application, provider, bank, legal, custody, due-diligence, delivery, insurance, settlement or administration charge must be disclosed in writing with its payee, purpose, due date and refund status before payment is requested.

| Situation | General treatment |
|---|---|
| No charge paid | No refund is due. |
| Charge expressly marked refundable | Handled under the written refund conditions, evidence requirements and processing period stated before payment. |
| Third-party cost already incurred | Normally non-refundable to the extent paid or irrevocably committed, unless the written terms state otherwise. |
| Applicant withdrawal | Assessed under the signed terms and completed work; uncommitted refundable balances, if any, are returned under the stated procedure. |
| Application declined | A decline does not by itself determine refundability; the written fee schedule and costs already incurred control. |
| Duplicate or unauthorized payment | Investigated promptly and, once verified, corrected or returned subject to banking, fraud and legal controls. |
| Counterparty non-performance | Any 2% remedy applies only if stated in the executed transaction agreement and its conditions are satisfied. |

## Refund request procedure

1. Send the request to compliance@banksinstruments.com from the applicant's registered email.
2. Identify the applicant, transaction reference, payment date, amount, currency and originating account.
3. Attach the payment record and the written term that states the requested refund right.
4. Allow identity, fraud, bank, third-party cost and contractual verification before a decision.
5. Approved refunds are returned only through a lawful traceable route, normally to the original payer or account unless compliance approves otherwise.

## Complaints and policy changes

Questions, privacy requests, refund requests or complaints may be sent to compliance@banksinstruments.com. The policy may be updated to reflect operational, legal or regulatory changes. The published effective date should be updated when the verified final policy is adopted. Governing law is Hong Kong law, subject to mandatory rights that cannot lawfully be excluded.

## Approval record

| Version | Effective date | Approved by | Next review |
|---|---|---|---|

| | | | |
|---|---|---|---|
| [INSERT] | [INSERT] | [INSERT] | [INSERT] |