



合规调查表附件 1: “了解您的客户 (KYC)”流程中个人信息出境的补充说明 (中国)  
**Appendix 1 to Compliance Questionnaire:**  
**Supplemental Description of Outbound Transfer of the Personal Information (China) under**  
**“Know Your Client (KYC)” Procedure**

TMF 中国向境外提供个人信息的详情约定如下:

Details of outbound transfer of the Personal Information by TMF China are set out as follows:

**(一) 处理目的:**

反洗钱 (AML) /反恐怖主义融资 (CFT) 合规管理, 包括

- AML/CFT客户尽职调查和持续监控程序, 包括:  
(1) 潜在客户的尽职调查、识别和接受 (了解您的客户 (KYC) 流程); (2) 为KYC流程定期审核和维护客户记录; 和 (3) 可疑交易监控; 和
- 相应的AML/CFT内部监控和审计程序

**1. Purpose of processing:**

AML/CFT Compliance Management, including:

- AML/CFT Client Due Diligence and On-going Monitoring Procedure, including (1) prospective client due diligence, identification and acceptance (Know Your Customer (“KYC”) process); (2) regular review and maintenance of client records for KYC process; and (3) suspicious transaction monitoring; and
- the respective AML/CFT Internal Monitoring and Auditing Procedure.

**(二) 处理方式:**

个人信息的存储、使用、传输、提供、删除

**2. Method of processing:**

storage, use, transmission, provision and deletion of personal information

**(三) 境外接收方:**

TMF Group B.V., TMF 集团的行政管理中心和欧洲经济区 (EEA) 代表

**3. Overseas Recipient:**

TMF Group B.V., the central administration and EEA representative of TMF Group

**(四) 出境个人信息种类:**

- 姓、名、国籍、税收居所、私人/居住地址;
- 电话号码、邮件地址、出生日期、婚姻状态、专业领域和实际职能;
- 年收入范围、财富总额范围、财富来源;
- 护照/身份证件复印件 (包含护照/身份证号、有效日期、签发机构、个人照片);
- 美国纳税人识别号 (如有);
- 违法犯罪记录、交易记录。

**4. Types of the Personal Information transferred abroad:**

- family name, first name, nationality, tax residence, private/residential address,
- phone number, e-mail address, date of birth, marital status, profession and actual function,
- range of annual income, range of estimated wealth, source of wealth,
- copy of passport, or other identification document (including its number, issuance and expiry dates, issuing authority, photo of individual),
- US Taxpayer Identification Number (TIN) (if any),
- criminal records, transaction records.

**(五) 出境敏感个人信息种类:**

- 护照/身份证件复印件 (包含护照/身份证号、有效日期、签发机构、个人照片);
- 美国纳税人识别号 (如有);
- 违法犯罪记录、交易记录。

**5. Types of the Sensitive Personal Information transferred abroad:**

- copy of passport, or other identification document (including its number, issuance and expiry dates, issuing authority, photo of individual),
- US Taxpayer Identification Number (TIN) (if any),



- criminal records, transaction records.

**（六）境外接收方只向以下中华人民共和国境外第三方提供个人信息**

因向客户提供服务根据适用法律有义务进行 AML/CFT 客户尽职调查程序的 TMF 集团其他关联方（经另行授权同意）

**（七）传输方式：**

个人信息通过公网传输

**（八）出境后保存期限：**

自业务关系终止或者相关交易发生之日起十（10）年

**（九）出境后保存地点：**

1. 微软 Microsoft 365（Outlook 邮件服务和 Teams 服务）：位于爱尔兰和荷兰的微软企业云（由 Microsoft B.V 提供）
2. FenX 应用程序：位于爱尔兰的亚马逊云（AWS）（由 Fenargo Limited 提供）

**（十）如何行使您的权利**

您可以通过以下途径行使您的权利并提交您的请求：

- 1) 联系您的业务联系人；
- 2) 向集团隐私办公室发送电子邮件（邮箱：[dataprotection@tmfgroup.com](mailto:dataprotection@tmfgroup.com)）；或
- 3) 使用 TMF 集团网站的 [TMF Group 数据主体诉求表（Privacy Web Form）](#)

如果要求被确认合理的，我们将立即采取行动，满足具体要求，或根据情况纠正不符合要求的情况。与您的沟通将以简洁、透明的方式进行，使用清晰明了的语言。信息将以书面形式（包括电子方式，与您使用的通信方式相对应）提供。

**6. The Overseas Recipient only provides the Personal Information to the following third parties outside the territory of the People's Republic of China:**

Other affiliates of TMF Group to the extent that will be engaged in the service provided to client, therefore obliged to conduct AML/CFT client due diligence procedure based on applicable laws (upon the separate authorization and consent)

**7. Transfer method:**

The personal data is transmitted via public Internet.

**8. Storage period after being transferred abroad:**

Ten (10) years from the date following the day of termination of the business relationship or the execution of the relevant transaction

**9. Storage place after being transferred abroad:**

1. Microsoft 365 (Outlook email service and Teams service): located at Microsoft Cloud Enterprise in Ireland and the Netherlands (provided by Microsoft B.V)
2. FenX application: located at AWS in Ireland (provided by Fenargo Limited)

**10. How to exercise your rights**

You may exercise your rights and submit your request by:

- 1) contacting your business contact person,
- 2) emailing to the Group Privacy Office via [dataprotection@tmfgroup.com](mailto:dataprotection@tmfgroup.com); or
- 3) using the the TMF Group Data Subject Request Form ([Privacy Web Form](#)) in TMF website.

Should the request be justified, we will take immediate actions to comply with the specific request, or to remedy the compliant, as the case may be. Communication with the you will be conducted in a concise, transparent manner, using clear and plain language. The information will be provided in writing without undue delay, including electronic means, if corresponds to the communication means used by you.