

Global Forum on Transparency and Exchange of Information for Tax Purposes: Hong Kong (China) 2019 (Second Round)

**PEER REVIEW REPORT ON THE EXCHANGE
OF INFORMATION ON REQUEST**

March 2019
(reflecting the legal and regulatory framework
as at December 2018)

Table of contents

Reader's guide	5
Abbreviations and acronyms	9
Executive summary	13
Overview of Hong Kong	21
Part A: Availability of information	27
A.1. Legal and beneficial ownership and identity information	27
A.2. Accounting records	61
A.3. Banking information	76
Part B: Access to information	89
B.1. Competent authority's ability to obtain and provide information	89
B.2. Notification requirements, rights and safeguards	99
Part C: Exchanging information	105
C.1. Exchange of information mechanisms	105
C.2. Exchange of information mechanisms with all relevant partners	117
C.3. Confidentiality	118
C.4. Rights and safeguards of taxpayers and third parties	127
C.5. Requesting and providing information in an effective manner	128
Annex 1: List of in-text recommendations	143
Annex 2: List of all exchange of information mechanisms	145
Annex 3: Methodology for the review	149
Annex 4: Hong Kong's response to the review report	153