

## PRIVACY POLICY

(the “**Company**”) respects the privacy of its online visitors and customers of its products and services (including, but not limited to ) and complies with applicable laws for the protection of your privacy, including, without limitation, the European Union General Data Protection Regulation (“**GDPR**”) and the Swiss and EU Privacy Shield Frameworks.

(the “**Company**”) respects the privacy of its online visitors and customers of its products and services (including, but not limited to ) and complies with applicable laws for the protection of your privacy.

### 1. Definitions

Wherever we talk about Personal Data below (“**Personal Data**”), we mean any information that can either itself identify you as an individual (“**Personally Identifying Information**”) or that can be connected to you indirectly by linking it to Personally Identifying Information, for example:

- (i) your account registration information on our website and in our App;
- (ii) when you request any support from us or report any problem to us;
- (iii) information provided from using certain services or features;
- (iv) information from completion of survey or questionnaire;
- (v) technical information, including the Internet protocol (IP) address used
- (vi) and your log-in information, browser, time zone setting, browser plug-in types and versions, operating system and platform;
- (vii) details of any transactions, purchases and payments you made;
- (viii) your general interaction with the website, including the full Uniform Resource Locators (URLs), clickstream to, through and from our site, products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information;
- (ix) information received from third parties, such as business partners, sub-contractors, payment and delivery services, referral by other users.

The Company also processes anonymous data, aggregated or not, to analyze and produce statistics related to the habits, usage patterns, and demographics of customers as a group or as individuals. Such anonymous data does not allow the identification of the customers to which it relates. the Company may share anonymous data, aggregated or not, with third parties. Please be aware that the Company may choose to permit third parties to offer subscription and/or registration-based services through the Company's site. The Company shall not be responsible for any actions or policies of such third parties and you should check the applicable privacy policy of such party when providing personally identifiable information.

By using the Company's website, you signify your assent to the Company's privacy policy. If you do not agree to this policy, please do not use the Company's website(s).

## **2. Why the Company Collects and Processes Data**

2.1 The Company collects and processes Personal Data for the following reasons:

- (a) performing our agreement with you to provide content and services, including providing, improving and developing our services;
- (b) researching, designing and launching new features or products;
- (c) providing you with alerts, updates, materials or information about our services or other types of information that you requested or signed up to;
- (d) collecting overdue amounts;
- (e) responding or taking part in legal proceedings, including seeking professional advice, or for the purposes of the legitimate and legal interests of the Company or a third party (e.g. the interests of our other customers);
- (f) compliance with legal obligations that we are subject to;
- (g) communicating with you and responding to your questions or requests;
- (h) direct marketing (please see further details in Clause 2.2 below)
- (i) purposes directly related or incidental to the above; or
- (j) where you have given consent to it.

These reasons for collecting and processing Personal Data determine and limit what Personal Data we collect and how we use it (section 3. below), how long we store it (section 4. below), who has access to it (section 5. below) and what rights and other control mechanisms are available to you as a user (section 6. below).

2.2 We intend to use your personal data in direct marketing (i.e. offering or advertising products or services by sending the relevant information directly to you). We require your consent specifically for this purpose and you may opt out any time. For the purpose of this clause:

- (a) the personal data that may be used in direct marketing are those that you provide to us or we collect from you under Clause 1.1 above;
- (b) the type of services or products that may be offered or advertised will be doc;
- (c) the relevant information may be sent to you by none;
- (d) you may opt out at any time and we will cease to send you marketing information without charge.

## **3. What Data We Collect and Process**

### **3.1 Basic Account Data**

When setting up an Account, the Company will collect your email address and country of residence. You are also required to choose a user name and a password. The provision of this information is necessary to register a User Account. You are responsible for keeping this password confidential. We ask you not to share a password with anyone.

During setup of your account, the account is automatically assigned a number (the "ID") that is later used to reference your user account without directly exposing Personally Identifying Information about you.

### **3.2 Transaction and Payment Data**

In order to make a transaction online, you may need to provide payment data to the Company to enable the transaction. If you pay by credit card, you need to provide typical credit card information (name, address, credit card number, expiration date and security code) to the Company, which the Company will process and transmit to the payment service provider of your choice to enable the transaction and perform anti-fraud checks. Likewise, the Company will receive data from your payment service provider for the same reasons.

### **3.3 Other Data You Explicitly Submit**

We will collect and process Personal Data whenever you explicitly provide it to us or send it as part of communication with others, e.g. in forums, chats, or when you provide feedback or other user generated content. This data includes:

- (a) Information that you post, comment or follow in any of our Content and Services;
- (b) Information sent through chat;
- (c) Information you provide when you request information or support from us or purchase Content and Services from us, including information necessary to process your orders with the relevant payment merchant or, in case of physical goods, shipping providers;
- (d) Information you provide to us when participating in competitions, contests and tournaments or responding to surveys, e.g. your contact details.

### **3.4 Your Use of the Websites**

We collect a variety of information through your general interaction with the websites, Content and Services offered by us. Personal Data we collect may include, but is not limited to, browser and device information, data collected through automated electronic interactions and application usage data. Likewise, we will track your process across your websites and applications to verify that you are not a bot and to optimise our services.

### **3.5 Your Use of Services and other Subscriptions**

In order to provide you with services, we need to collect, store and use various information about your activity in our Content and Services. "Content-Related Information" includes your ID, as well as information about your preferences, progress, time spent, as well as information about the device you are using, including what operating system you are using, device settings, unique device identifiers, and crash data.

### 3.6 Tracking Data and Cookies

We use "Cookies", which are text files placed on your computer, to help us analyse how users use our services, and similar technologies (e.g. web beacons, pixels, ad tags and device identifiers) to recognise you and/or your device(s) on, off and across different devices and our services, as well as to improve the services we are offering, to improve marketing, analytics or website functionality. The use of Cookies is standard on the internet. Although most web browsers automatically accept cookies, the decision of whether to accept or not is yours. You may adjust your browser settings to prevent the reception of cookies, or to provide notification whenever a cookie is sent to you. You may refuse the use of cookies by selecting the appropriate settings on your browser. However, please note that if you do this, you may not be able to access the full functionality of our websites. When you visit any of our services, our servers log your global IP address, which is a number that is automatically assigned to the network your computer is part of.

### 3.7 Third Party Services

This website uses ("**Third Party Service**"). Third Party Service uses "cookies", which are text files placed on visitors' computers, to help the website operators analyse how visitors use the site. The information generated by the cookie about the visitors' use of the website will generally be transmitted to and stored by Third Party Service on servers in the [United States]. Please be aware that Company cannot or does not control the use of cookies or the resulting information by the Third Party Service.

On behalf of the website operator, Third Party Service will use this information for the purpose of evaluating the website / location / credentials for its users, in order to compile reports on website activity, and to provide other services relating to website activity and internet usage for website operators.

Third Party Service will not associate the IP address transferred any other data held by the Company. You may refuse the use of cookies by selecting the appropriate settings on your browser. However, please note that in this case you may not be able to use the full functionality of this website.

### 3.8 Content Recommendations

We may process information collected under this section 3 so that content, products and services shown on the pages and in update messages displayed when launching the service can be tailored to meet your needs and populated with relevant recommendations and offers. This is done to improve your customer experience.

Subject to your separate consent or where explicitly permitted under applicable laws on email marketing, the Company may send you marketing messages about products and services offered by the Company to your email address. In such a case we may also use your collected information to customise such marketing messages as well as collect information on whether you opened such messages and which links in their text you followed.

You can opt out or withdraw your consent to receive marketing emails at any time by either withdrawing the consent on the same page where you previously provided it or clicking the "unsubscribe" link provided in every marketing email. Notwithstanding any opt out of promotional or marketing emails by you, we reserve the right to contact you regarding account status, changes to the user agreement and other matters relevant to the underlying service and/or the information collected.

### **3.9 Information Required to Detect Violations**

We collect certain data that is required for our detection, investigation and prevention of fraud, cheating and other violations of the applicable laws ("**Violations**"). This data is used only for the purposes of detection, investigation, prevention and, where applicable, acting on of such Violations and stored only for the minimum amount of time needed for this purpose. If the data indicates that a Violation has occurred, we will further store the data for the establishment, exercise or defence of legal claims during the applicable statute of limitations or until a legal case related to it has been resolved. Please note that the specific data stored for this purpose may not be disclosed to you if the disclosure will compromise the mechanism through which we detect, investigate and prevent such Violations.

## **4. How We Store Data**

### **4.1 Period of Storage**

We will store your information as long as necessary to fulfil the purposes for which the information is collected and processed or — where the applicable law provides for longer storage and retention period — for the storage and retention period required by law. In particular, if you terminate your User Account, your Personal Data will be marked for deletion except to the degree legal requirements or other prevailing legitimate purposes dictate a longer storage. All your data and credits will be lost after deletion.

### **4.2 Deletion of Data**

In cases where Personal Data cannot be completely deleted in order to ensure the consistency of the system, the user experience or the community, your information will be permanently anonymised. Please note that the Company is required to retain certain transactional data under statutory commercial and tax law for a period of up to ten (10) years.

If you withdraw your consent on which a processing of your Personal Data, we will delete your Personal Data without undue delay to the extent that the collection and processing of the Personal Data was based on the withdrawn consent.

If you exercise a right to object to the processing of your Personal Data, we will review your objection and delete your Personal Data that we processed for the purpose to which you objected without undue delay, unless another legal basis for processing and retaining this data exists or unless applicable law requires us to retain the data.

### **4.3 Location of Storage**

The data that we collect from you may be transferred to, and stored at a destination outside Hong Kong. It may also be processed by third parties referred to in Clause 5 below who operate outside Hong Kong. By submitting your personal data you agree to this transfer, storing or processing of data outside Hong Kong. We will take all steps reasonably necessary to ensure that your data is treated securely in accordance with this privacy policy.

## **5. Who Has Access to Data**

5.1 We may share your Personal Data with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in Schedule 1 of the Securities and Future

Ordinance (Cap. 571) of the Law of Hong Kong; and use it to the degree necessary to achieve the purposes listed in section 2 above. In the event of a reorganisation, sale or merger we may transfer Personal Data to the relevant or proposed transferees of our operations (or a substantial part thereof) in any part of the world.

5.2 We may also share your Personal Data with our third party providers that provide customer support services in connection with goods, Content and Services distributed via us. Your Personal Data will be used in accordance with this Privacy Policy and only as far as this is necessary for performing customer support services.

5.3 We may also share your information with our personnel, agents, advisers, auditors, contractors, financial institutions, and service providers in connection with our operations or services (for example staff engaged in the fulfilment of your order, the processing of your payment and the provision of support services); persons under a duty of confidentiality to us; or persons to whom we are required to make disclosure under applicable laws and regulations in any part of the world.

5.4 In accordance with internet standards, we may also share certain information (including your IP address and the identification of content you wish to access) with our third party network providers that provide content delivery network services and server services in connection with us. Our content delivery network providers enable the delivery of digital content you have requested, by using a system of distributed servers that deliver the content to you, based on your geographic location.

5.5 The Company may allow you to link your User Account to an account offered by a third party. If you consent to link the accounts, the Company may collect and combine information you allowed the Company to receive from a third party with information of your User Account to the degree allowed by your consent at the time. If the linking of the accounts requires the transmission of information about your person from the Company to a third party, you will be informed about it before the linking takes place and you will be given the opportunity to consent to the linking and the transmission of your information. The third party's use of your information will be subject to the third party's privacy policy, which we encourage you to review.

5.6 The Company may release Personal Data to comply with court orders or laws and regulations that require us to disclose such information.

5.7 We make certain data related to your User Account available to other users. This information can be accessed by anyone by querying your ID. At a minimum, the public persona name you have chosen to represent you are accessible this way. The accessibility of any additional info about you can be controlled through your user profile page; data publicly available on your profile page can be accessed automatically. While we do not knowingly share Personally Identifying Information about you such as your real name or your email address, any information you share about yourself on your public profile can be accessed, including information that may make you identifiable.

5.8 The community includes message boards, forums and/or chat areas, where users can exchange ideas and communicate with each other. When posting a message to a board, forum or chat area, please be aware that the information is being made publicly available online; therefore, you are doing so at your own risk; and that such information can be collected, correlated and used by third parties and may result in unsolicited messages from other posters or third parties and these activities are beyond our control. If your Personal Data is posted on one of our community forums against your will, please use the reporting function and the help site to request its removal.

5.9 We may share your Personal Data with actual or proposed transferees of our operations (or a substantial part thereof) in any part of the world.

## **6. Your Rights and Control Mechanisms**

You have the right to:

- (a) check whether we hold personal data about you;
- (b) access any personal data we hold about you;
- (c) require us to correct any inaccuracy or error in any personal data we hold about you;
- (d) request for the deletion of your personal data through the deletion of user account.

The data protection laws of the European Economic Area and other territories grant their citizens certain rights in relation to their Personal Data. While other jurisdictions may provide fewer statutory rights to their citizens, we make the tools designed to exercise such rights available to our customers worldwide.

As a resident of the European Economic Area you have the following rights in relation to your Personal Data:

### **6.1 Right of Access**

You have the right to access your Personal Data that we hold about you, i.e. the right to require free of charge (i) information whether your Personal Data is retained, (ii) access to and/or (iii) duplicates of the Personal Data retained. You can use the right to access to your Personal Data through the Privacy Dashboard. If the request affects the rights and freedoms of others or is manifestly unfounded or excessive, we reserve the right to charge a reasonable fee (taking into account the administrative costs of providing the information or communication or taking the action requested) or refuse to act on the request.

### **6.2 Right to Rectification**

If we process your Personal Data, we shall endeavour to ensure by implementing suitable measures that your Personal Data is accurate and up-to-date for the purposes for which it was collected. If your Personal Data is inaccurate or incomplete, you can change the information you provided via the Privacy Dashboard.

### **6.3. Right to Erasure**

You have the right to obtain deletion by us of Personal Data concerning you by deleting your User Account via the support page.

As a result of deleting your User Account, you will lose access to services, including the User Account, Subscriptions and service-related information linked to the User Account and the possibility to access other services you are using the User Account for.

We allow you to restore your User Account during a grace period of 30 (thirty) days from the moment you request deletion of your User Account. This functionality allows you not to lose your account by

mistake, because of your loss of your account credentials or due to hacking. During the suspension period, we will be able to finalise financial and other activities that you may have initiated before sending the User Account deletion request. After the grace period, Personal Data associated with your account will be deleted subject to section 4. above.

In some cases, deletion of your User Account, and therefore Personal Data deletion, is complicated. In some cases, considering the complexity and number of the requests, the period for Personal Data erasure may be extended, but for no longer than two further months.

#### **6.4 Right to Object**

When our processing of your Personal Data is based on legitimate interests according to Article 6(1)(f) of the GDPR / section 2.c) of this Privacy Policy, you have the right to object to this processing. If you object we will no longer process your Personal Data unless there are compelling and prevailing legitimate grounds for the processing as described in Article 21 of the GDPR; in particular if the data is necessary for the establishment, exercise or defence of legal claims.

You also have the right to lodge a complaint at a supervisory authority.

#### **7. Children**

The minimum age to create a User Account is . the Company will not knowingly collect Personal Data from children under this age. Insofar as certain countries apply a higher age of consent for the collection of Personal Data, the Company requires parental consent before a User Account can be created and Personal Data associated with it collected. The Company encourages parents to instruct their children to never give out personal information when online.

#### **8. Contact Info**

You can contact the Company's data protection officer at the address below.

While we review any request sent by mail, please be aware that to combat fraud, harassment and identity theft, the only way to access, rectify or delete your data is through logging in with your User Account at .

Attention: Privacy Officer

#### **9. Revision Date**

This privacy policy was last updated on ("**Revision Date**"). If you were a user before the Revision Date, it replaces the existing Privacy Policy. The Company reserves the right to change this policy at any time by notifying the users of the existence of a new privacy statement. This policy is not intended to and does not create any contractual or legal rights in or behalf of any party.