

PRIVACY POLICY

This Privacy Policy applies to all personal information collected by Embracy Limited via the website located at www.embracy.com.

1. What is "personal information"?

- (a) The Cap. 486 Personal Data (Privacy) Ordinance (the "PDPO") currently defines "personal information" as meaning information or an opinion about an identified individual or an individual who is reasonably identifiable:
 - (i) whether the information or opinion is true or not; and
 - (ii) whether the information or opinion is recorded in a material form or not.
- (b) If the information does not disclose your identity or enable your identity to be ascertained, it will in most cases not be classified as "personal information" and will not be subject to this privacy policy.

2. What information do we collect?

The kind of personal information that we collect from you will depend on how you use the website. The personal information which we collect and hold about you may include: such as the domain from which you access the Internet, the date and time you access the Site, and the Internet address of the website from which you linked directly to our Site – is statistical only and not personally identifiable. We use information about the number of visitors and their use of the Site in aggregate form to make our Site more useful and attractive to you. Generally, the Company only collects identifiable information that is specifically and voluntarily provided by a visitor to our Site. Typically, the Company obtains limited identifiable information from visitors, such as name, title, address, email address, and telephone and fax numbers. For example, if you send us an email message requesting information about Embracy, we will use your email address and other information you supply to respond to your request, either directly or via a Embracy approved Partner.

3. How we collect your personal information

- (a) We may collect personal information from you whenever you input such information into the website.
- (b) We also collect cookies from your computer which enable us to tell when you use the website and also to help customise your website experience. As a general rule, however, it is not possible to identify you personally from our use of cookies.

4. Purpose of collection

- (a) The purpose for which we collect personal information is to provide you with the

best service experience possible on the website and to be able to deliver our services and comply with AML/CTF legislation.

- (b) We customarily disclose personal information only to our service providers who assist us in operating the website. Your personal information may also be exposed from time to time to maintenance and support personnel acting in the normal course of their duties.
- (c) By using our website, you consent to the receipt of direct marketing material. We will only use your personal information for this purpose if we have collected such information direct from you, and if it is material of a type which you would reasonably expect to receive from us. We do not use sensitive personal information in direct marketing activity. Our direct marketing material will include a simple means by which you can request not to receive further communications of this nature.

5. Access and correction

DPP 6 Access and Correction permits you to obtain access to the personal information we hold about you in certain circumstances, and DPP 6 Access and Correction allows you to correct inaccurate personal information subject to certain exceptions. If you would like to obtain such access, please contact us at customer@embracy.com.

6. Complaint procedure

If you have a complaint concerning the manner in which we maintain the privacy of your personal information, please contact us as set out below. All complaints will be considered by Chief Risk Officer and we may seek further information from you to clarify your concerns. If we agree that your complaint is well founded, we will, in consultation with you, take appropriate steps to rectify the problem. If you remain dissatisfied with the outcome, you may refer the matter to the Office of the Privacy Commissioner for Personal Data.

7. Overseas transfer

Your personal information will not be disclosed to recipients outside Hong Kong unless you expressly request us to do so. If you request us to transfer your personal information to an overseas recipient, the overseas recipient will not be required to comply with the Cap. 486 Personal Data (Privacy) Ordinance ("PDPO") and we will not be liable for any mishandling of your information in such circumstances.

8. GDPR

In some circumstances, the European Union General Data Protection Regulation (GDPR) provides additional protection to individuals located in Europe. The fact that you may be Embracy Limited - Privacy Policy located in Europe does not, however,

on its own entitle you to protection under the GDPR. Our website does not specifically target customers located in the European Union and we do not monitor the behaviour of individuals in the European Union, and accordingly the GDPR does not apply.

9. How to contact us about privacy

If you have any queries, or if you seek access to your personal information, or if you have a complaint about our privacy practices, you can contact us through: customer@embracy.com