# **HighBlock** Limited **Privacy Policy**

HighBlock Limited and its affiliates (hereinafter referred to as "HighBlock", "we" "us" or "our") is committed to protecting the privacy, confidentiality and security of the personal date held by HighBlock complying with the requirements of the Personal Data (Privacy) Ordinance (Cap. 485 of the laws of Hong Kong) ("PDPO") with respect to the collection, use and management of personal data. In doing so, HighBlock is equally committed to ensuring that all its employees and agents uphold these obligations.

This Privacy Policy describes:

- the personal data which HighBlock will collect or process,
- how personal data will be used, shared and protected, and
- your rights in relation to personal data, including the right to make data access and correctio n requests.

Personal data will be collected only for lawful and relevant purposes and all practicable steps will be taken to ensure that personal data held by HighBlock is accurate. HighBlock will use your personal data which HighBloc k may from time to time collect in accordance with this Privacy Policy.

HighBlock reserves the right from time to time to revise this Privacy Policy. Where any changes to this Privacy Policy are material, HighBlock will notify you using the contact details which you have provided HighBlock and by updating and issuing the new version on the HighBlock website. HighBlock has the right to decide whether or not to notify you by using the contact details you have provided to HighBlock. You are advised to check the Privacy Policy periodically and pay attention to its revision. After the publication of the new version of this Privacy Policy, your continued use of the HighBlock website or your continued relationship with HighBlock shall be deemed to be acceptance of and consent to this updated Privacy Policy, as amended from time to time.

HighBlock will take reasonable and practicable steps to ensure the security of your personal data and to avoid unauthorised or accidental access, erasure or use for other purposes. This includes physical, technical, and procedural security methods, where appropriate, to ensure that your personal data may only be accessed by authorised personnel.

Please note that if you do not provide HighBlock with personal data (or relevant personal data relating to persons appointed by you to act on your behalf), HighBlock may not be able to provide the information, products or services you have asked for or process your requests, applications, subscriptions or registrations, as applicable.

# Collection of personal data

Personal data may be collected from you on a voluntary basis for particular purposes or services. We will only collect your personal data that is needed and by lawful and fair means, including but not limited to:

- your personal information (e.g., your name, gender, date of birth, passport or other personally identifiable information, your photo, your bank account details);

- your contact information (e.g., telephone number, mailing addresses, email address);

- your business information (e.g., company name/ address, registration details);
- information when you use our Website/ Services (e.g., behavioral information, location information, browser details, IP addresses, user acquisition data) - please also see our Cookies Policy.

We will collect your personal data:

- when you provide such data to us directly by phone, mail or email;
- when you submit such data to us on the Website (for example, by completing and submitting any forms);
- from third parties such as co-hosts or co-presenters in marketing events;
- from publicly available sources of information;
- when you navigate through the Website; and
- when we are legally required to do so.

## Use of personal data

From time to time, where personal data is provided to HighBlock, HighBlock may use the personal data as explained blow and such personal data may be transferred to a place outside Hong Kong.

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Transfer	We may use the personal data collected in order to: (i) provide the Services you require; (ii)
	operate, improve and maintain our Services; (iii) respond to any queries or feedback you may
	have; (iv) verify your identity and location; (v) assess whether you are eligible to access the
	Website,; (vi)send you our news and publications; (vii) communicate with you about us, our
	Services and our marketing materials; (viii) track your activities on the Website; (ix) conduct
	data analyses and general research; (x) maintain security of the Website; and (xi) detect fraud
	or criminal activity. We will share your personal data with third parties where it is necessary to
	satisfy the purposes for which the data is collected as set out above, including without
	limitation:
	- our staff who need the information to discharge their duties;
	- our affiliates for marketing or sales out reach;
	- co-hosts or co-presenters for authorised and managing marketing events;
	- our service providers for data analyses;
	- any person or entity to whom we are under an obligation to make disclosure under applicable
	laws, regulations or guidelines issued by government, regulatory or other authorities; and
	- any person you have authorised to interact with us on your behalf.
	We will never sell your personal data to any third party.
Process	We will process your personal data fairly and only for those purposes we have told you, for
	purposes permitted by you or as permitted by applicable law. In addition, you may object to
	certain types of processing as expressly permitted by applicable law. The personal data that we
	collect may be transmitted to and stored in the data centres of third-party data storage
	provider(s) in or out of Hong Kong.
Disclose	Subject to any legal, statutory, regulatory or accounting requirements, there may be
	circumstances under which we may disclose your personal data to third parties (including but
	not limited to regulators and auditors) to whom we are under an obligation or otherwise
	required to make disclosure.

## Protection of personal data

All personal data provided to HighBlock will be securely stored with restricted access by authorized personnel only. We utilize encryption/security software for data transmission so as to protect your data via encrypting it in a secure format to ensure its privacy and security from unauthorised access or disclosure, accidental loss, alteration or destruction.

In addition, we will adopt contractual or other means to prevent any personal data transferred to HighBlock'sdata processors (i) from being kept longer than is necessary for processing of the data; and (ii) from unauthorized or accidental access, processing, erasure, loss or use, if HighBlock is to engage any data processor.

Nevertheless, the transmission of information via the internet is not completely secure. Although HighBlock will do its best to protect your personal data, HighBlock cannot guarantee the security of data transmitted to the High Block website. Once your personal data is received, HighBlock will use strict procedures and security features to try to prevent unauthorized access.

#### Notice on direct marketing

Where you have given consent and have not subsequently opted out, HighBlock may from time to time use your personal data (including your name and contact details) to send you direct marketing or promotional communications such as emails containing news, promotions, events and marketing offers. The dispatch of such direct marketing communications may be undertaken by third-party service providers.

If you do not wish to receive further direct marketing or promotional materials from HighBlock, you may opt out of receiving direct marketing or promotional communications by (i) clicking the "unsubscribe" button at the bottom of our marketing communications or (ii) sending us an email: <a href="mailto:support@bitv.com">support@bitv.com</a> with your full name and contact details. We will then stop sending you any marketing related communication or providing your personal data to a third party for use by that party in direct marketing. We will also notify any third party to whom your personal data has been so provided to stop using the data in direct marketing. Please note that you may continue to receive marketing communications for a short period after changing your preferences while we or the third parties are updating the systems. If your personal data is used in any direct marketing communications, you have

the right to request that we provide you with the source of that personal data. There is no fee for requesting this information. We will provide you with the source of personal data unless it is impracticable or unreasonable to do so.

# **Retention of personal data**

Subject to any legal, statutory, regulatory or accounting requirements, the personal data you provide to us will be kept by us in the appropriate form only for as long as is necessary to fulfil the purposes of providing you with the Services after which it will be destroyed.

#### Access and correction of personal data

Upon request, we will inform you about how your personal data is processed and the rights and remedies you have under these principles. You may, by sending an email to <u>support@Bitv.com</u>, enquire as to the nature of the personal data stored or processed about you by us, including:

- asking us to correct your personal data which is held by us;

- requesting deletion or erasure of your personal data;
- objecting to the sharing of your personal data (in certain circumstances); or
- objecting to the profiling of your personal data.

## Termination or cancellation

Should your relationship with HighBlock be cancelled or terminated at any time, HighBlock shall cease processing your personal data as soon as reasonably practicable following such cancellation or termination, provided that Hi ghBlock may keep copies of the data as is reasonably required for reasonable purposes, such reasonable purposes shall include keeping of records, use in relation to any actual or potential dispute, complying with applicable laws and regulations, and protecting HighBlock's rights, property or safety, or the rights, property or safety of HighBl ock's employees and agents.

Certain personal data (e.g., relating to your personal information and contact information) are required for your continued use of the Website/ Services provided by us and if you fail to supply such personal data, we may not be able to deliver you the Website/ Services. By providing your personal data to us, you acknowledged that such provision is fair and reasonable in the circumstances.

The principles set out in this policy show our commitment to you in respect of your personal data. The policy and principles we uphold thereunder may be amended and/ or updated from time to time. You are advised to check this policy periodically, to see and be informed of our current principles for the protection of your personal data.

If you have questions or comments in relation to the principles or your personal data, please contact us at: Address: 21/F, HIP SHING HONG CENTRE. 55 DES VOEUX ROAD CENTRAL HK Email: support@Bitv.com