



# HighBlock Limited

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## Privacy Policy

Date: 28 Oct 2025

Version 2.0

HighBlock Limited operates an online virtual asset trading platform through its website (“Website”) at <https://www.bitv.com>, including any additional sites launched from time to time. Through the Website, offers its products and services.

HighBlock Limited and its affiliates (“HighBlock”, “we”, “us” or “our”) are committed to safeguarding the privacy, confidentiality and security of the personal data in our possession. We comply with all applicable data protection laws, including the Personal Data (Privacy) Ordinance (Cap. 486 of the Laws of Hong Kong) (“PDPO”), in relation to the collection, use, processing and management of personal data. We are equally committed to ensuring that all employees and agents adhere to these obligations.

HighBlock collects personal data only for lawful and relevant purposes and takes all practicable steps to ensure that the personal data it holds is accurate. Your personal data will be used strictly in accordance with this Privacy Policy.

### **Updates to this Privacy Policy**

HighBlock may revise this Privacy Policy from time to time. Where material changes are made (for example, the introduction of a new purpose for using your personal data), HighBlock will notify you using the contact information you have provided and will publish the updated version on the Website. For non-material changes, HighBlock may, at its discretion, determine whether notification is required.

You are encouraged to review this Privacy Policy periodically to stay informed of any updates. By continuing to use the Website or maintaining your relationship with HighBlock after the publication of any revised version, you will be deemed to have accepted and consented to the updated Privacy Policy (to the extent that consent is the applicable legal basis for processing your personal data).

### **Security Measures**

HighBlock adopts reasonable and practicable measures to safeguard your personal data and prevent unauthorized or accidental access, processing, erasure, or misuse. These measures include physical, technical and procedural controls to ensure access is restricted to authorized personnel only.

## Consequences of Not Providing Personal Data

If you do not provide HighBlock with the personal data requested (including personal data relating to individuals authorised to act on your behalf), HighBlock may be unable to provide the information, products or services you services you have requested, or to process your requests, applications, subscriptions, or registrations.

## Collection of Personal Data

Personal data may be collected from you voluntarily for specific purposes or services. HighBlock will collect only the data that is necessary and will do so in a lawful and fair manner. This may include, but is not limited to, the following types of data:

- Name, company name, company registration or residential address, telephone number, mobile number, gender, date of birth, nationality, email address, passport or national identification number, etc.  
Bank account details or other payment information.
- Details such as salary, income, and asset information (where applicable).
- Internet domain, IP address, access date and time when using our Website or services.

## How We Collect Personal Data

HighBlock may collect your personal data in the following ways:

- directly from you by telephone, post or email;
- when you submit information through the Website (e.g., by completing online forms);
- from third parties, including co-organizers or co-presenters at marketing events;
- from publicly available sources;
- through your browsing activities on our Website; and
- where required by applicable laws or regulations.

## Use of Personal Data

Your personal data may be used for the purposes described in this Privacy Policy and may be transferred outside Hong Kong for processing or storage by HighBlock.

<p><b>Transfer</b></p>	<p>We may use the collected personal data for the following purposes:</p> <ul style="list-style-type: none"> <li>(i) to provide the services you have requested;</li> <li>(ii) to operate, improve and maintain our services;</li> <li>(iii) to respond to any inquiries or feedback from you;</li> <li>(iv) to verify your identity and location;</li> <li>(v) to assess your eligibility to access the Site;</li> <li>(vi) to send you our news and publications;</li> <li>(vii) to communicate with you about us, our services and our marketing materials;</li> <li>(viii) to track your activity on the Website;</li> <li>(ix) to conduct data analysis and general research;</li> <li>(x) to maintain the security of the Website; and</li> <li>(xi) to detect fraudulent or criminal activity.</li> </ul> <p>We may share your personal data with third parties when necessary to achieve the purposes outlined above, including, but not limited to:</p> <ul style="list-style-type: none"> <li>(i) staff who require relevant information to perform their duties; including but not limited to: <ul style="list-style-type: none"> <li>- account opening and maintenance, including Know-Your-Client processing;</li> <li>- trade execution and monitoring, including market surveillance; and</li> <li>- artificial intelligence and other algorithm based tools.</li> </ul> </li> <li>(ii) affiliated companies used for marketing or sales promotions;</li> <li>(iii) co-organizers or co-presenters who are authorized to assist and manage marketing activities;</li> <li>(iv) service providers used for data analysis;</li> <li>(v) persons or entities to whom we are obliged to disclose information under applicable laws, regulations or guidelines issued by governmental, regulatory or other authorities; and</li> <li>(vi) any individual you authorize to interact with us on your behalf.</li> <li>(vii) any actual or proposed assignee(s), participant(s), sub-participant(s) or transferee(s) of our rights in respect of you;</li> </ul> <p>We will never sell your personal data to any third party.</p>
<p><b>Process</b></p>	<p>We will process your personal data fairly and only for the purposes we have informed you of, for which you have provided consent, or as permitted by applicable law. You may also object to certain types of processing in accordance with the express provisions of applicable law. The personal data we collect may be transferred to and stored in the data centers of third-party storage providers, which may be located in or outside Hong Kong.</p>

<b>Disclose</b>	Subject to applicable legal, regulatory, supervisory, or accounting requirements, we may disclose your personal data to third parties, including, but not limited to, regulators and auditors, when we are obligated or required to do so.
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## 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. By encrypting data into a secure format, we ensure its privacy and security from unauthorized access or disclosure, accidental loss, alteration or destruction.

In addition, we may adopt contractual or other means to prevent any personal data transferred to HighBlock's data 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.

However, transmission of information over the internet is never completely secure. While HighBlock takes all reasonable measures to protect your personal data, we cannot guarantee the security of data transmitted to our website(s). Once your personal data is received, HighBlock implements strict procedures and security measures to prevent unauthorized access.

## Notice on Direct Marketing

Where you have provided consent and have not 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 special offers. These communications may be sent on our behalf by third-party service providers.

If you do not wish to continue to receive direct marketing or promotional materials from HighBlock, you may opt out by:

- (i) clicking the "unsubscribe" button at the bottom of our marketing communications; or
- (ii) sending us an email to [support@bitv.com](mailto:support@bitv.com) providing your full name and contact details.

We will cease sending you any marketing communications and will stop providing your personal data to third parties for their direct marketing purposes. We will also inform any third parties who have previously received your personal data to

discontinue using it for direct marketing.

Please note that you may still receive marketing communications for a short period after updating your preferences, as we or the relevant third parties may require time to update our systems.

If your personal data has been used for direct marketing, you have the right to request information about the source of that data. This request is free of charge, and we will provide the source unless it is not practicable or reasonable for us to do so.

### **Retention of Personal Data**

In compliance with legal, regulatory, supervisory, or accounting requirements, the personal data you provide to us will be retained in an appropriate format only for as long as necessary to fulfill the purpose for which the service was provided, after which it will be securely destroyed.

### **Access and Rectification of Personal Data**

Upon request, we will provide you with information regarding the processing of your personal data, as well as your rights and available remedies under these principles. You may enquire about the personal data we hold or process by sending an email to us that includes:

- a request to rectify any personal data we hold about you;
- a request to delete or erase your personal data;
- an objection to the sharing of your personal data (where applicable); or
- an objection to your personal data being analysed or profiled.

### **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 HighBlock 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 HighBlock's employees and agents.

Certain personal data (such as your personal and contact information) is required for you to continue using our website and services. If you do not provide such data, we may be unable to deliver the relevant website functions or services to you. By submitting your personal data to us, you acknowledge that doing so is fair and reasonable under the circumstances.

The principles set out in this policy reflect our commitment to safeguarding your personal data. As this policy and its principles may be revised from time to time, you are encouraged to review it periodically to stay informed of our latest personal data protection practices.

### **Language**

If there is any inconsistency or conflict between the English and Chinese versions of this Privacy Policy, the English version shall prevail.

### **Contact Us**

Should you have any questions or comments regarding these principles or the handling of your personal data, please contact us at:

**Address:** 1704-1705 17/F, Universal Trade Center, 3 Arbuthnot Road, Central, Hong Kong

**Email:** [support@bitv.com](mailto:support@bitv.com)