

## Privacy Policy

### 1. Scope and Consent

BÉABA Asia Limited (“**BAL**”) is concerned with the protection of your personal information and data. In this respect, BAL is committed to adhering to the “*Six Data Protection Principles of the Personal Data (Privacy) Ordinance*” (Cap. 486 of the Laws of Hong Kong) (“PDPO”), and the relevant provisions of the PDPO as displayed at:

[https://www.pcpd.org.hk/english/data\\_privacy\\_law/6\\_data\\_protection\\_principles/principles.html](https://www.pcpd.org.hk/english/data_privacy_law/6_data_protection_principles/principles.html)

This personal data privacy policy (this “**Policy**”) describes how BAL has created its own personal data privacy policy to regulate how BAL is to collect, use, disclose, retain and protect your *personal information*. In this respect, your “*personal information*” is information about you that is personally identifiable such as your name, email address and or phone number, and that is not otherwise publicly available. By using the Services (as defined in the terms and conditions of use displayed separately (the “**Terms and Conditions**”)), you are deemed to: (1) accept the terms and conditions of this Policy, and the Terms and Conditions; and (2) consent to the collection, use, disclosure, retention, and protection of your personal information by BAL as described in the Policy. If you do not provide the information required by BAL, it may not be able to provide all of the Services to you.

This Policy does not apply to the practices and policies of companies that BAL does not own or control, or to people that BAL does not employ or manage.

### 2. Personal Information Collection & Use

BAL will collect personal information when you use the app, as defined in the Terms and Conditions and or when you use the Services.

BAL may combine such personal information about you with other personal information that it may obtain about you, from its business partners or other companies.

The personal information that BAL may collect includes, but is not limited to, the following: -

(A) personal information that you provide to BAL when you use the Services: -

- (1) identifying information such as your name and telephone number;
- (2) information you provide during your use of the App;
- (3) financial information if any in connection with payments made by you as a result of your transactions if any on the App;

- (4) in some instances, when you use the Services, you may be required to provide your age, gender, etc.; and or
  - (5) additional information that BAL is required or authorized, by applicable laws, to collect and process in order to authenticate or identify you or to verify the information it has already collected.
- (B) personal information that BAL automatically collects when you use the Services, including but not limited to the following: -
  - (1) information about your interactions with the App, your preferences and your communications with BAL
  - (2) geo-location information, including information from the location of your mobile device;
  - (3) information received and recorded from your mobile device, including the mobile device's cookie information (if applicable), software and hardware attributes and the recipes, videos, or other materials you requested to access or read; and or
  - (4) mobile phone and connection information, such as statistics on your views, App traffic, ad data, your IP address and your browsing history,
- (C) your personal information that BAL collects from other sources: -
  - (1) BAL may supplement your personal information it collects with information as provided from third parties; and or
  - (2) if you give the personal information about someone else to BAL, you must do so only with their explicit and prior consent. You have to inform such persons how BAL collects, uses, discloses and retains their personal information according to this Policy.

BAL uses personal information for the following general purposes: to customize the contents you see on the App, fulfill your requests for the Services, improve the quality of the Services, contact you and conduct research.

### **3. Personal Information Sharing & Disclosure**

BAL will not rent, sell or disclose your personal information to any other person or non-affiliated company, save and except when it has obtained your prior permission to do so or provide requested Services in the following circumstances:-

- (1) BAL is required to respond to subpoenas, court orders or legal proceedings, or is needed to establish or exercise its legal rights or to defend against any legal claims in relation to the Website and or the Services;
- (2) BAL believes it is necessary to share your personal information in order to assist the investigation, prevention or actions in relation to illegal activities, suspected fraud, situations involving potential threats to the personal safety of any persons, and the preventions of violations of the Terms and Conditions;

- (3) BAL receives requests from the party, pursuant to the power under Section 58 of the PDPO; and/or
- (4) BAL transfers your personal information to a third party if it is acquired by or merged with the said third party. In this event, it will notify you before your personal information is transferred. Your personal information will then be subject to a different personal data privacy policy.

#### **4. Access to the Personal Information**

BAL shall take each step necessary to ensure that the personal information it collects is accurate and the latest, and that you are entitled to access and make corrections to your personal information. Please immediately update your personal information if it is changed or is inaccurate.

BAL will honour any statutory right you might have to access, modify or delete your personal information. You may request access to your personal information by contacting BAL, following its instructions. Under certain circumstances, BAL can still withhold that access, decline to modify or delete your personal information in accordance with the PDPO, but will give you reasons if it does so.

BAL reserves the right to send you certain communications relating to the Services, such as service announcements, administrative messages and newsletters. Unless you provide a written request to BAL to request for opt out of receiving the above communications, otherwise you accept the same.

#### **5. Transfer of the Personal Information**

BAL may store, process and/or transfer personal information to a country or territory outside Hong Kong directly or indirectly by way of some third-party service providers. In such circumstances, personal information will be transferred to those business partners, who may be situated outside Hong Kong, but who are chosen by BAL carefully, for the purposes of information statistical management and business operation. In particular, personal information may be transferred to outsourcing agencies who work for BAL to perform certain data processing regarding personal information. By using BAL or the Services thereto, you agree that BAL may transfer or store personal information to a country or territory outside Hong Kong, directly or by way of third-party service providers.

#### **6. Cookies**

BAL may set and access its cookies on your mobile phone.

#### **7. Confidentiality and Safety**

BAL limits access to your personal information to certain of its employees who it believes reasonably need to have access to that personal information in order to provide the Services and or to perform their jobs.

BAL also has a substantial, electronic and procedural safeguard that complies with the PDPO to protect your personal information.

## **8. Changes to this Policy**

BAL may update this Policy from time to time. If so, it will notify you about the changes to this Policy and or of the way in which it treats personal information by displaying a prominent notice in respect of any such changes when the App is opened.

## **9. Your consent and rights**

By using our Services, you consent to the collection and use of your information and other activities as outlined in this policy.

Under the Hong Kong Personal Data (Privacy) Ordinance (the "**Ordinance**"), individuals have the right:

- (1) to check whether we hold personal data about you and to access such data;
- (2) to require us to correct as soon as reasonably practicable any data relating to you that is inaccurate;
- (3) to ascertain our policies and practices in relation to personal data and the kind of personal data held by us; and
- (4) to object to the use of your personal data for marketing purposes and we shall not use your personal data for marketing purposes after you communicate your objection to us.

You may exercise your opt-out right by notifying us if you wish to object to the use of your personal data for direct marketing purposes. Please send requests for such objections, access to data, correction of data, information regarding policies and practices and kinds of data held, questions or complaints to:

address: BEABA ASIA LTD., Room 1-2, 13/F., Kwan Chart Tower, 6 Tonnochy Road, Wan Chai, Hong Kong

email: hongkong@beaba.com

In accordance with the terms of the Ordinance, we have the right to and may charge a reasonable fee for processing any data access request.

In the event that a User wishes to access or amend his or her personal information and data, the Company may request him or her to provide personal details in order to verify and confirm his or her identity. A HKID card number or passport number or business registration certificate number cannot be amended unless such data is proved to be inaccurate. The Company is required to respond to a User's request within thirty (30) days of his or her request and will endeavor to do so wherever possible.