



Hong Kong Digital Asset EX Limited

Data Privacy Policy

Version: 3.0

Updated as at 14 May 2024

The following sets out how Hong Kong Digital Asset Ex Ltd. (“we”, “us”, “HKbitEX” or the “Company”) will collect, use, store, share, transmit, delete or otherwise process (collectively, “process”) your personal data during our operation of the website <http://www.hkbitex.com.hk> (the “Website”). For the purpose of this policy, personal data means any information relating to you directly or indirectly, from which it is practicable for your identity to be directly or indirectly ascertained, or such wider definition as may be prescribed in the Personal Data (Privacy) Ordinance (Cap. 485 of the laws of Hong Kong).

Promise: We respect your privacy and will protect the personal data we receive. We will never sell your personal data to any third party. We will ensure compliance by our staff to access personal data with the highest security and confidentiality standards.

Information Collection: we will only collect your personal data that is needed and by lawful and fair means, including but not limited to:

- 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.

In order to provide a better service to you, we may, in the course of and in relation to provision of our services, collect and process the following information about you:

- Identification and contact information: such as your name, your company name, company registration address or residential address, telephone number, mobile phone number, gender, date of birth and/or nationality, email address, your passport or national ID number, etc.
- Payment information: such as bank details.
- Financial information: details including salary, income, and assets information (where collected).
- Location information: details including Internet domain and IP address from where you access our Website, the date and time you access our services. (Please also see our Cookies Policy.)

Use of Information: we may use the personal data collected in order to: (i) provide the services you require; (ii) improve and maintain our operations and 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 our services and marketing materials with you; (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 may share your personal data with third parties where it is necessary to satisfy the purpose described in the above, including without limitation:

- Our staff who need the information to discharge their duties;
- Our affiliates for marketing or sales outreach;
- Co-hosts or co-presenters for authorized 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 authorized to interact with us on your behalf.

Processing: 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 storage provider(s) out of Hong Kong.

Direct Marketing: we may use your personal data, and/or share your personal data with our affiliates without any gain, in order to send you marketing materials from time to time, without limitation, events, programmes and newsletters. We will not use your personal data for direct marketing or provide your personal data to third parties for direct marketing unless we have received your consent. You may opt out of receiving marketing communications at any time, such request can be made by (i) clicking the “unsubscribe” button at the bottom of our marketing communications or (ii) sending an email request to <support@hkbitex.com.hk> with your name and contact details. Upon receipt of your notification, we will then stop sending you any marketing related communications or providing your personal data to a third party for use by that party in direct marketing (if you have provided consent before). We will also notify any third party to whom your personal data has been so provided to stop using the data in direct marketing (if any). While please note that you may continue to receive marketing communications for a short period after changing your preferences as it might take some time for us or the third party to update the system records. 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.

Data Quality: We will use appropriate technology and well-defined practices to process your personal data promptly and accurately. We will not keep your personal data longer than is necessary, except as otherwise required by applicable law.

Security and Confidentiality: we will keep your personal confidential and limit access to your personal to those who specifically need it to conduct the business activities, except as otherwise permitted by applicable law. We refer to industry standards and use reasonable administrative, technical, and physical security measures to protect your personal data from unauthorized access, destruction, use, modification, or disclosure.

Disclosure: 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.

Data Retention: subject to any legal, statutory, regulatory or accounting requirements, we will only retain your personal data for as long as we have a business relationship with you and for a period of time afterwards where we have an ongoing business need to retain it, or where we are required by law to retain it. Upon the expiry of time relating to any business needs or legal requirements to retain your personal data we will ensure that your personal data is deleted.

Data Security: we have implemented various internal policies (including physical, electronic and management measures) to safeguard and secure the personal data collection, preventing unauthorized or accidental access, processing, erasure or other use of the personal data.

Openness and Data Access: 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 [<support@hkbitex.com.hk>](mailto:support@hkbitex.com.hk), enquire as to the nature of the personal data stored or processed about you, 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.

Certain personal data (e.g., relating to your identification and contact information) are required for your continued use of our Website/service. The provision of personal data by you and browsing the website means you acknowledge the principles set out in this policy in respect of your personal data.

This policy may be amended / updated from time to time, to ensure that it is consistent with our business needs or to accommodate amendments to applicable regulatory requirements. We encourage you to check this policy periodically to ensure that you are aware of our latest principles for processing your personal data.

If you have any questions or comments in relation to the collection and processing of your personal data, please contact us at:

Office Address: 18/F, On Hing Building, No. 1 On Hing Terrace, Central, Hong Kong.

Email: info@hkbitex.com.hk