

## Disclaimer and Privacy

### **Introduction**

Xinics Co Limited (西尼克斯有限公司) [Xinics] respects the privacy of our consumer users and has developed this Privacy Policy to demonstrate its commitment to protecting your privacy. As an individual who is a user of our website(xinics.com.hk), apps, mini-program or otherwise as a user of the services provided by Xinics, this Privacy Policy is intended to describe for you:

- the information we collect about you;
- how that information may be used;
- with whom it may be shared;
- how you may access the information you provide us; and
- your choices about such uses and disclosures.

We encourage you to read this Privacy Policy carefully when using our websites, services or transacting business with us. By using our services, you are accepting the practices described in this Privacy Policy.

If you have any questions about our privacy practices, please refer to the end of this Privacy Policy for information on how to contact us.

### **Information We Collect About You**

#### **In General**

We may collect personal information that can identify you such as your Name, nick name, apps ID, as well as other information that does not identify you. When you provide personal information through our websites or otherwise provide to us, the information may be sent to servers located in Hong Kong and other countries around the world.

#### **Information You Provide**

We may collect and store any personal information you enter on our websites or otherwise provide to us. This includes identifying information (such as your name, or apps' id, phone number), information about your location, your, personal information (such as your gender).

#### **Information from Other Sources**

We may also periodically obtain both personal and non-personal information about you from business partners,

contractors and other third parties. Examples of information that we may receive information about your home and additional demographic information.

### **Use of Cookies and Other Technologies to Automatically Collect Information**

We use various technologies to collect information from your computer and about your activities on our websites. We automatically collect information from your browser when you visit our websites. This information includes your IP address, your browser type and language, access times, the content of any undeleted cookies that your browser previously accepted from us (see "Cookies" below) and the referring website address.

### **Cookies**

When you visit our websites, we may assign your computer one or more cookies, to facilitate access to our websites, to personalize your online experience and to record information about your visit to our websites. Through the use of a cookie, we also may automatically collect information about your online activity on our websites, such as the web pages you visit, the links or advertisements you click, or the other actions you conduct while on our websites. The cookies do not store any personally identifiable information about you. Most browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies. If you choose to decline cookies, please note that you may not be able to sign in or use some of the interactive features offered on our websites.

### **Other Technologies**

We may use standard Internet technology, such as web beacons and other similar technologies, to track your use on our websites. We also may include web beacons in promotional e-mail messages or newsletters to determine whether messages have been opened and acted upon. The information we obtain in this manner enables us to customize the services we offer our websites' visitors to deliver targeted advertisements and to measure the overall effectiveness of our online advertising, content, programming or other activities.

### **Information Collected by Third Parties**

We may allow third parties, including our authorized service providers, advertising companies, and ad networks, to display advertisements on our websites. We and these companies may use tracking technologies, such as cookies, to collect information about users who view or interact with these advertisements and connect to our websites. Our websites do not provide any personal information to these third parties. This information allows us and these companies to deliver and gauge the effectiveness of targeted advertisements. Some of these third-party advertising companies may be advertising networks that are members of the Network Advertising Initiative, which offers a single location to opt out of ad targeting from member companies.

## **How We Use The Information We Collect**

We may use information that we collect about you to:

- deliver the products and services that you have requested;
- manage your customer relationship and provide you with customer support;
- perform research and analysis about your use of, or interest in, our products, services, or content, or products, services or content offered by others;
- communicate with you by telephone and/or mobile devices about products or services that may be of interest to you either from us or other third parties;
- develop and display content and advertising tailored to your interests on our websites and other websites;
- verify your eligibility and deliver prizes in connection with promotions, contests and lucky draw;
- enforce our terms and conditions;
- manage our business; and
- perform functions as otherwise described to you at the time of collection.

## **With Whom We Share Your Information**

We want you to understand when and with whom we may share personal or other information we collect about you or your activities on our websites or your use of our services. We may use your information to match with joint ventures or partners company offers to you promotions.

## **Personal information**

We do not share your personal information with others except as indicated below or when we inform you and give you an opportunity to opt out of having your personal information shared. We may share all types of personal information with:

### **Business partners**

When you express interest in products, services or promotions offered through our websites or our services, we may share your expression of interest with the businesses with which we partner to offer you those products, services, promotions, contests and/or lucky draws, and, as applicable, their affiliates and third-party finder or marketing companies. When you elect to engage in a particular offer or program, you authorize us to provide your information to those businesses.

### **Other Xinics sister companies**

We may share information we collect, including personal information, with other related companies. Sharing information with other Xinics companies enables us to provide you with information about a variety of products and services that might interest you. All Xinics companies comply with this Privacy Policy. Xinics companies also will comply with applicable privacy and security laws and, at a minimum, in any commercial information they send to you, will give you the opportunity to choose not to receive such messages from that company in the future.

However, in no circumstance will Xinics share with other companies any personally identifiable information that you provide to us if that information bears on your creditworthiness.

### **Other Situations**

#### **We may also disclose your information:**

- In response to a subpoena or similar investigative demand, a court order or a request for cooperation from a law enforcement or other government agency; to establish or exercise our legal rights; to defend against legal claims; or as otherwise required by law. In such cases, we may raise or waive any legal objection or right available to us.
- When we believe disclosure is appropriate in connection with efforts to investigate, prevent or take other action regarding illegal activity, suspected fraud or other wrongdoing; to protect and defend the rights, property or safety of our company, our users, our employees or others; to comply with applicable law or cooperate with law enforcement; or to enforce our website's' terms and conditions or other agreements or policies.
- Any third parties to whom we may disclose personal information may have their own privacy policies that describe how they use and disclose personal information. Those policies will govern use, handling and disclosure of your personal information once we have shared it with those third parties as described in this Privacy Policy. If you want to learn more about their privacy practices, we encourage you to visit the websites of those third parties. These entities or their servers may be located either inside or outside of Hong Kong.

### **Aggregated and Non-Personal Information**

We may also share it with third parties or other companies to develop and deliver targeted advertising on our websites and on websites of third parties. We may combine non-personal information we collect with additional non-personal information collected from other sources. We also may share aggregated information with third parties, including advisors, advertisers and investors, for the purpose of conducting general business analysis. For example, we may tell our advertisers the number of visitors to our websites and the most popular features or services accessed. This information does not contain any personal information and may be used to develop website content and services that we hope you and other users will find of interest and to target content and advertising.

### **Third-party websites**

There are a number of places on our websites where you may click on a link to access other websites that do not operate under this Privacy Policy. For example, if you click on an advertisement or a search result on our websites, you may be taken to a website that we do not control. These third-party websites may independently solicit and collect information, including personal information, from you and, in some instances, provide us with information about your activities on those websites. We recommend that you consult the privacy statements of all third-party websites you visit by clicking on the "privacy" link typically located at the bottom of the webpage you are visiting.

## **How We Protect Your Personal Information**

Here at Xinics, your personal data and the information that you share with us in confidence, is treated with the utmost respect and care. Thus, the safety of your personal data is important to us and it is our policy to respect the confidentiality of information and the privacy of every individual.

You can also visit our website at [xinics.com.hk](http://xinics.com.hk) to view the details of this policy as listed here. We also comply with local data protection and privacy laws in all our operations outside of Hong Kong which are owned and managed by Xinics Company Limited.

## **What types of personal data do we collect?**

We collect personal data about our customers, such as:

- Name
- Gender
- Phone Number
- Email address
- Payment records
- Charge up location and pattern
- Apps' ID

We may collect and hold personal data of persons/entities including but not limited to:

- All customers
- Job applicants and employees
- Shareholders
- Service providers
- Other people who we may come into contact in the course of operations

*Examples of such personal data include biodata, contact details, account information and your preferences, queries, requests and feedback.*

The personal data inventory is:

- Collected to assist in requested applications for all our offered products and services and/ or for the purposes of employment of individuals and its associated processes.
- This information is stored either physically within our office premises or on company servers.
- The information is only disclosed to the related business entities at which requested applications are processed at as well as our business partners who partake in similar customer requested and approved applications for various products and services.

*When collecting any personal data, all individuals are informed of the purpose(s) for which it will be collected, used or disclosed and consent from individuals are obtained prior to any initiation of collection.*

### **How do we collect personal data?**

The ways in which we may collect personal data include (but are not limited to) collecting directly or indirectly from individuals or authorized representatives in the course of:

- Signing up for alerts or newsletters
- Visiting our websites
- Applying for a product or service through us and / or our business partners
- Applying for a job with us
- Participating in our marketing or promotional events
- Using our products or services
- Contacting us with queries, requests or feedback
- Conducting or completing of transactions
- Conducting market research or surveys
- Conducting interviews

### **For what purposes do we collect personal data?**

In general, we may use personal data for the following purposes:

- Conducting and completing transactions (e.g. processing orders and payments; providing products or services that have been requested by users)
- Providing customer service (e.g. responding to queries and requests; informing users about service / application / processing statuses and product updates)
- Sending alerts and newsletters as requested by users
- Conducting market research and improving customer service
- Conducting marketing promotions (e.g. sending of alerts, newsletters, marketing materials and invitations from us wholly or through affiliation with third parties)
- Complying with applicable laws, regulations and other requirements
- Performing of evaluations (e.g. assessing suitability of employees)

Xinics will only use, disclose and/or transfer personal data for the purposes individuals have been notified of and consented to or which are permitted under applicable laws and regulations.

We regard breaches of privacy very seriously and we have implemented measures to secure and protect information, such as training our employees who handle personal data to respect the confidentiality of such personal data, storing personal data in a combination of secure computer storage facilities and paper-based files and other records, taking steps to protect the personal data we hold from misuse, loss, unauthorised access, modification or disclosure.

We cannot however, secure personal data from cyber-attacks, such as hacking, spyware and viruses. Individuals cannot hold Xinics liable for any unauthorized disclosure, loss or destruction of personal data arising from such risks.

The Act also requires us not to store personal data longer than necessary. We will cease to retain the personal data when it is no longer required for the purposes, we originally notified the individual for or any business or legal needs.

#### **How to exercise a right to access the personal data we hold?**

To be informed of the personal data we possess, as given to us by individuals, a verification of identity will be required of the party requesting the information. Disclosure is made only to the individual whom the personal data pertains to.

#### **How to exercise a right to remove consent to our access of an individual's personal data?**

To make a request to withdraw consent previously given, please contact us directly at [enquiry@xinics.com.hk](mailto:enquiry@xinics.com.hk)

#### **Visiting Our Website From Outside Hong Kong**

This Privacy Policy is intended to cover collection of information on our websites from residents of Hong Kong. Please be assured that we seek to take reasonable steps to ensure that your privacy is protected. By using our services, you understand that your information may be transferred to our facilities and those third parties with whom we share it as described in this privacy policy.

#### **No Rights of Third Parties**

This Privacy Policy does not create rights enforceable by third parties or require disclosure of any personal information relating to users of our websites. Changes to this Privacy Policy. We will occasionally update this Privacy Policy to reflect changes in our practices and services. When we post changes to this Privacy Policy, we will revise the "last updated" date at the top of this Privacy Policy. If we make any material changes in the way we collect, use, and/or share personal information that may impact you, we will notify you by sending an e-mail to the e-mail address you most recently provided us in your account (if any), profile or registration (unless we do not have such an e-mail address), and/or by prominently posting notice of the changes on our websites. We recommend that you check our websites from time to time to inform yourself of any changes in this Privacy Policy or any of our other policies.

#### **How To Contact Us**

If you have any questions about this Privacy Policy or our information-handling practices, or if you would like to request information about our disclosure of personal information to third parties for their direct marketing purposes, please contact us at [enquiry@xinics.com.hk](mailto:enquiry@xinics.com.hk)