

Personal Data & Privacy Policy Statement

SPECTRA Technologies Holdings Co. Ltd (SPECTRA), its subsidiaries, affiliates and associated companies including Spectra Merchant Services Ltd. and SoePay Limited respect your privacy rights – whether you are users of our services and applications, past, current or potential customers who use or enquire about our products or services provided from time-to-time participants in our events or surveys, or subscribers to our newsletters, promotions and offers. Our collection, transmission, storage and usage of personal data will be in compliance with the Personal Data (Privacy) Ordinance (Cap 486), the Laws of the Hong Kong Special Administrative Region ("PDPO"). The term "personal data" has the meaning as defined in the PDPO.

1. Purpose of Collection and Use of Personal Data

If you are a user of the Services, personal data is collected from you to enable us to provide Services to you. We will indicate to you the personal data without which we will not be able to provide you the Services.

You may decline to provide us with the requested personal data, but in such case, we may not be able to provide the Services to you.

However, if you require our follow-up services such as requesting for catalogues, other promotional brochures or materials or providing you with an update on any of the Services, including potential new Services or extension of service coverage or plan(s) offered, then the provision of your name and at least one of your contact details are necessary for us to provide the follow-up services to you through your contact details provided. We may also require certain personal data from you if you participate in our events or surveys, or subscribe to our newsletters, promotions and offers. Provision of your personal data under such circumstances is entirely voluntary but we will not be able to process your inquiry, participation or subscription if you do not provide your name and/or contact details.

Personal data collected from you may be used by us for the following purposes:

- (a) Following up and processing of your application for the Services;
- (b) Enabling the provision of the Services to you;
- (c) Conducting identity verification and/or credit checks at the time of your application for the Services, if necessary;
- (d) Processing of payment instructions or collection of outstanding amounts from you in relation to the provision of the Services;
- (e) Marketing our products and Services;
- (f) Designing Services for you;
- (g) Conducting market research or customers' surveys;
- (h) Providing customer services;
- (i) Following up and handling your complaints and enquiries;
- (j) Sending you newsletters, promotions and offers;
- (k) Personal data collected from job applicants is used for consideration of the applicants' job application, and for recruitment related purposes, and will not be used for any other purposes, disclosed or transferred without your consent, unless such use, disclosure or transfer is permitted or required by law.
- (l) Making such disclosures as required by applicable laws and regulations;
- (m) Any other purposes as may be separately notified to or agreed with you, including the purposes stated in any applicable terms and conditions for the supply of specific goods and services; and

- (n) Any other purposes directly related to the purpose for which the personal data were originally collected.

We will not transfer your personal data to others except for the specific classes of data transferees as listed in paragraph 3 below.

2. Types of Personal Data Collected

Types of personal data collected by us may include:-

- (a) Your personal information and contact information such as your name, gender, date of birth, identity document number and/or its copy, email address(es), phone number(s) and address(es) made known to us;
- (b) Your business information such as company name and business title;
- (c) Your account details, including account numbers, or user accounts.
- (d) Certain data including any data or materials (including any copies) that you submit, post, disclose, display, link to or otherwise make available on the Platforms and any data or recordings of telephone calls to our customer service or hotlines and/or inquiry telephone numbers (for the purposes of quality control and staff training) which is mutually agreed as NOT personal data of yours or others, and is not subject to the various provisions of the PDPO and you have no rights and/or claims regarding such data (whether contractual, tortious or statutory);
- (e) Data for facilitating delivery of the Services offered by us (including data automatically collected to perform accurate reporting and administration of your accounts) which does not identify you as an individual and is not personal data including internet access, call connection time and date, duration, frequency, origin and destination.

3. Confidentiality, Disclosure and Security of Personal Data

All personal data collected and held by us will be kept confidential, but disclosure may be necessary for us to (A) comply with any statutory or legal obligations or requirements, or (B) provide the Services to you, or (C) carry out the original purpose, or a directly related purpose specified above, for which the personal data were collected, those data maybe provided to the following parties (whether within or outside Hong Kong):

- (a) Competent court of law, law enforcement agencies, governmental, statutory or regulatory authorities, institutions or organizations;
- (b) Our subsidiaries, associated and/or related company(ies), engaging in the provision of the Services;
- (c) Banks, financial institutions, credit card issuing companies, debt collection agencies, cloud service providers and other service providers involved in the sale, administration, promotion or provision of the Services;
- (d) Any person who is acting for or on behalf of or jointly with us;
- (e) Any other person or company who is under a duty of confidentiality to us provided he/she is able to prove the right to the data;
- (f) Our dealers, agents, contractors, suppliers, other service providers and content providers and professional advisers;
- (g) Our partners in joint promotional activities; and
- (h) Persons who may be entitled to disclosure under circumstances described in Part VIII of the PDPO (meaning personal data exempt from Data Protection Principle 3 of the PDPO).

Our Third Party Service Providers are under a duty of confidentiality and are contractually bound to use your personal data in connection with the purposes specified above, and not for their own purposes (including direct marketing).

We have implemented, based upon appropriate physical, electronic and managerial measures and controls to safeguard all personal data provided by you and to secure the transmission of such data to the third parties listed above. Your personal data are only accessible by our own personnel or the personnel of the third parties listed above for the purposes specified above. Our own personnel and the personnel of the Third Party Service Providers will be instructed to observe the duty of confidentiality and the terms of this Statement when accessing your personal data and handle personal data only in accordance with this Statement.

Any questions, comments, suggestions or information (including materials or data submitted, posted, disclosed, displayed, linked to or otherwise made available on the open platforms sent or posted will be considered as voluntarily provided to us on a non-confidential, non-private, publicly available and non-proprietary basis. We reserve the right (without any obligation, without any charge and without any liability whatsoever to us (and our officers, personnel, agents, contractors and third party service providers) and without giving any notice to you) to:

- (1) Use, reproduce, disclose, transmit, publish and/or post elsewhere such information freely, including passing it to any associated company for example, in connection with the development, manufacturing and marketing of products and Services and to meet Customer needs; and
- (2) Validate data provided or made available using generally accepted practices (including, in accordance with the PDPO, requiring review of original documentation before the personal data may be used (e.g., Personal Identifiers and proof of address), production of your identity document in person for checking) and contacting you about any materials made available on the open platforms.

All reasonable efforts are made to ensure that any personal data held by us is stored in a secure and safe place.

4. Transfer of Personal Data Outside Hong Kong

We may transfer the collected personal data to places outside Hong Kong when it is necessary for carrying out the purposes, or the directly related purposes specified above. All the transfer of those personal data will be carried out in compliance with the requirements of the PDPO. As personal data may be stored or processed in another jurisdiction, it may be accessible to law enforcement and national securities of that jurisdiction.

5. Retention of Personal Data

Unless there is a mandatory legal requirement for us to keep your personal data for a specified period, we will only retain your personal data for as long as necessary to fulfill the purposes specified above for which the personal data were originally collected. We will periodically redact, purge, anonymize or destroy unnecessary personal data in our system in accordance with our internal procedures. Unless otherwise required by applicable laws and/or regulations and subject to the foregoing provision(s) of this paragraph, if you are a Customer, personal data collected from you will be kept for not more than 7 years upon termination of all Services

you subscribed with us unless we have justifiable reason(s) to keep your personal data for further period.

6. Direct Marketing

Your name and contact details, including email address(es), phone number(s) and address(es) made known to us, collected from you may be used by us for direct marketing of:

- (a) Our activities, products and Services, including but not limited to, our latest offers, gifts, discounts, benefits, information relating our services; and
- (b) Activities, products and services of our subsidiaries, associated and/or related company(ies) and business partners.

We will only use your personal data with your consent. Your consent may be communicated to us at the time when you provide such information to us or in writing to our Personal Data Privacy Officer. You may also write to us at the address or email in below if you wish to withdraw any consent given to us.

7. Data Access, Correction and Erasure

If you have any query in relation to our privacy policy or you wish to access or correct or erase (erasure shall only be applicable when the right to erasure is mandatory or when we no longer have a justifiable reason to keep your personal data) your personal data held by us, you may contact us at the address or email as below marking your communication "Confidential". In response, we may ask you to provide certain details about yourself so that we can be sure you are the person to whom the data refers. We will try to respond to your requests within 30 days and we may charge you a reasonable fee for a data access request. Where you have provided us with your personal data through different channels, we may use your latest set of personal data to update your record with us; you may inform us if you prefer otherwise. For clarity, justifiable reason(s) to keep your personal data shall include but not be limited to instances where: (a) you are using our Services; (b) there is any unresolved, potential or threatened enquiries, dispute(s), claim(s), complaint(s), litigation(s) and/or proceeding(s) with or in connection with you; (c) there is any outstanding credit or debit balance under your account exceeding our prescribed threshold; (d) there is any cheque(s) issued by us to you but not yet banked in nor cancelled; (e) the information is in signed agreement(s) with us or document(s) collateral to such agreement(s) (except our standard service application or subscription form(s)) for compliance reasons and (f) we are required under law, regulation, or order, requirement(s) or request(s) of competent court of law, law enforcement agencies, governmental, statutory or regulatory authorities, institutions or organizations, to keep your personal data.

8. Personal Data Privacy Officer

If you have any requests (a) for access to data or correction or erasure (erasure shall only be applicable when the right to erasure is mandatory or when we no longer have a justifiable reason to keep your personal data) of data; (b) for general information regarding our policies and practices with respect to personal data; and (c) about the kinds of personal data that we hold or general questions and complaints please write to:-



SPECTRA Technologies Holdings Co. Ltd.

Personal Data Privacy Officer

(Marked Confidential)

Address: Unit 1301-09 & 19-20, Tower II, Grand Century Place, 193 Prince Edward Road West, Kowloon, Hong Kong

Tel.: (852) 2319 2918

Email: dataprivacy@spectratech.com

We reserve the right to charge you a reasonable fee for complying with a data access request as permitted by the PDPO.

This Statement may be amended from time to time where we deem necessary. We will issue notice for the amendment(s) by uploading it on our website at least 30 days before the effective date of such amendment(s).

Personal Data Privacy Officer

Date: 2 January 2024