



Privacy Policy

Everuts, operated by Offbeat Technology Hong Kong Limited, a wholly-owned subsidiary of Hong Kong Technology Venture Co Ltd (Hong Kong Stock Code: 1137) (collectively, “we”, “us”, the “**Company**”, “**Offbeat**”), respects the privacy rights of users to the Company’s website and mobile app and of individuals who participate in, access or sign up to any of the Company's services, activities or online content including but not limited to our sellers or business partners’ products and services (collectively referred to as “**Services**”). We endeavour to ensure that all our collection, transmission, storage and usage of personal data is carried out in compliance with the Personal Data (Privacy) Ordinance, Cap 486 of the laws of the Hong Kong Special Administrative Region (“**PDPO**”). By providing your personal data to us, you are consenting to this Privacy Policy.

The term "personal data" shall have the meaning ascribed to it by the PDPO.

PURPOSE OF COLLECTION AND USE OF PERSONAL DATA

When you participate in, access or sign up to any of the Services, personal data is collected from you to enable us to provide you with 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. By submitting your personal data, you consent to the use of that data as set out in this Privacy Policy.

Personal data collected from you may be used by the Company for, including but not limited to:

- identifying you and any accounts you hold with us
- enabling the provision of the Services to you
- conducting identity verification and/or credit checks
- determining and verifying your eligibility for discounts and promotions on products and services
- processing applications or renewal applications for our business partners’ products and services
- processing insurance claims for our business partners’ products and services, on your behalf
- processing of payment instructions or collection of amounts outstanding from you in relation to the provision of the Services
- order processing, billing and fulfilment
- enabling us to store your personal data so you do not have to re-enter it each time you purchase a product or renew an insurance product
- direct marketing of the Services (see section “Direct Marketing” below)
- direct marketing of the products and services of the Company’s business partners (see section “Direct Marketing” below)
- designing services for you
- conducting research, statistical analysis and behavioural analysis
- conducting program viewership survey and analysis
- customer profiling and analysing your purchasing preferences
- enabling you to participate in interactive features of our service, including identifying your friends or individuals, and sharing and communicating with them your shopping experience, when you choose to do so
- making suggestions and recommendations to you and other users of our Services or goods and services that may interest you or them

- customising the Company's website and its content to your particular preferences
- provisioning of customer services
- handling your complaints and account enquiries, and handling any claim, action and/or proceedings against the Company or any party
- fraud prevention and detection
- auditing purposes
- making such disclosures as required by applicable laws, rules and regulations
- any other purposes directly related to the purpose for which the personal data were originally collected

TYPES OF PERSONAL DATA COLLECTED

Types of personal data collected by the Company may include, but not limited to:

1. Your personal information and contact information such as your name, gender, date of birth, identity card number, telephone number, social media contact, email address, residential address, mailing address, and billing address;
2. Your business information such as company name and business title;
3. Your account details, including first 6 digits and last 4 digits of credit card account numbers, or user accounts;
4. Your payment transaction details with Everuts;
5. Your household income range, and personal interests;
6. IP address, real-time geographic location data, browser settings, browsing records, and/or other Internet log information of your computer or mobile device; and
7. Telephone numbers and email addresses contained in your contacts, when you choose to participate in interactive features of our service. In this case we will have informed you when you access to our service and by providing that data to us you agree that you have obtained consent from those individuals in your contacts.

We may access, use and/or process your biometric data including but not limited to fingerprints and facial images stored on your mobile device or other device for the purpose of conducting identity verification, however we will not collect nor store such data.

CONFIDENTIALITY, DISCLOSURE AND SECURITY OF PERSONAL DATA

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

- Competent court of law, law enforcement agencies, or other governmental or statutory authorities, institutions or organisations;
- Company's associated companies, business partners, contractors, agents, sellers or suppliers of the goods/services, or other service operators, who are involved in the sales and marketing, administration or provision of the Services;
- Company's business partners including without limitation insurance companies who assess and/or process insurance applications, renewal applications, insurance claims and settlements, provide insurance services for you and/or handle enquiries or complaints
- Any other person under a duty of confidentiality to the Company including a member of its group of companies, IT consultants, data processors, auditors,

accountants, or lawyers, which has undertaken to keep such information confidential; and

- Banks, financial institutions, insurance companies, credit card issuing companies or debt collection agencies.

Any questions, comments, suggestions or information other than personal data sent or posted to our website, or any part of the site by you will be considered as voluntarily provided to the Company on a non-confidential and non-proprietary basis. We reserve the right to 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 and marketing of services and to meet user needs.

We may share non-personal data such as anonymised data and aggregated data relating to without limitation sales transactions, user traffic, logistics and warehouse performance publicly and with our partners including without limitation with existing and potential business partners, sellers or suppliers of the goods/services, start-up entrepreneurs and academics.

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

All personal data which we collect is kept confidential to the best of our ability. You will appreciate however, that we cannot guarantee the security of transmission.

TRANSFER OF PERSONAL DATA OUTSIDE HONG KONG

If necessary, the Company may transfer the personal data to places outside the Hong Kong Special Administrative Region for carrying out the purposes, or the directly related purposes, for which the personal data were collected. All the transfer of those personal data will be carried out in compliance with the requirements of the PDPO.

We may contract with other companies to provide certain services, including credit card processing, shipping, name and address verification, email distribution, market research, marketing and advertising services (including advertising on third party websites, social media networks and profiling) and promotions management. We provide these companies with only the information they need to perform their services and work closely with them to ensure that your privacy is respected and protected. These companies will be prohibited by contract from using this information for their own marketing purposes or from sharing this information with anyone other than us.

When we do this, we make sure that appropriate steps are taken to protect your personal information and your rights. By providing us with your personal information, you agree that we may transfer, store and process your information outside the Hong Kong Special Administrative Region.

RETENTION OF PERSONAL DATA

If you choose, or you are provided with, a user identification code, password or any other piece of information as part of our security procedures, you must treat such information as confidential. You must not disclose it to any third party. If your mobile number is used for account login, you shall ensure that timely update is made by logging in to your account at "Account Profile" when your mobile number is to be changed or returned to your mobile operator. This is important to ensure that your account information will not be accessed by a third party who may have acquired the right to use your discarded mobile number. You are solely responsible for securing your account in this particular way. We shall have no liability to you for any loss or damage in this regard.

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 is necessary to fulfil the purpose for which the personal data were originally collected.

DIRECT MARKETING

From time to time, the Company may use your personal data to send you news, offers, promotions and joint marketing offers and the Company requires your consent for that purpose. We may contact you by email, in-app notifications, social media, SMS, text/picture/video message, telephone or mail.

Your name, email address, telephone number, contact address, social media contact, date of birth, products and services portfolio information, transaction patterns and behaviours, browsing records, content viewing habits and personal interests held by the Company may be used by the Company in direct marketing of the Services and the following products or services offered by the Company's business partners, advertising partners or the registered merchants of Everuts, including but not limited to: food and beverages, groceries, household products, personal care and health, skincare and makeup, maternity and baby, pets, electrical appliances, houseware and furniture, dining and lifestyle, sports and travel, toys and books, telecommunications, media and entertainment, fashion and apparel, jewellery, luxury goods, insurance and financial products, motor vehicles, real estate, government information and services and solicitation of donations or contributions for charitable, cultural, philanthropic or recreational purposes, which may be of interest to you.

If you prefer not to receive any direct marketing communications from us or our marketing partners, you can opt out at any time by updating your preferences through your registered account or an unsubscribe link provided. Upon receipt of your request, we shall cease to so use your personal data as soon as possible without charge to you.

USE OF COOKIES

A cookie is a small text file which is placed onto your computer (or other electronic device) when you access the Company's website. We use cookies on our website to:

- recognise you whenever you visit this website and/or app
- obtain information about your preferences, viewing and browsing behaviour, online movements and use of the Internet
- keep track of the items stored in your shopping basket (where applicable) and take you through the checkout process
- carry out research and statistical analysis to help improve our Services and to help us better understand our visitor and customer requirements and interests
- target our marketing and advertising campaigns and those of our business partners and advertisers more effectively by providing interest-based advertisements that are personalised to your interests
- make your online experience more efficient and enjoyable
- enable tighter security

The information we obtain from our use of cookies may not contain your personal data. Although we may obtain information about your computer or other electronic device such as IP address, browser settings, browsing records, and/or other Internet log information, this may not be able to identify you personally. To the extent that non-personal data is combined with personal data, we treat the combined data as personal data for the purposes of this Privacy Policy. In certain circumstances we may collect personal data about you, but only where you voluntarily provide it by completing an online form, or where you purchase goods from our website or use the Services.

If you want to disallow the use of cookies, you can do so on your own web browser. If you disable cookies, you acknowledge that you may not be able to use certain functionalities of our website.

LINKS

This Privacy Policy only applies to the Company's website and app. Our website and app may contain links to other sites and pages. By activating a link, such as for example by clicking on the banner of an advertiser, you leave our website and the Company does not exercise control over any personal data or any other information you give to any other entity after you have left our website. Access to and use of such other websites is at your own risk.

DELETING YOUR ACCOUNT

If you no longer wish to use our Services, you may delete your account within Settings. After you have terminated your use of our Services, we may retain certain information for record keeping purposes, to complete transactions or to comply with our legal obligations. We may also store your information in an aggregated and anonymized format.

DATA ACCESS AND CORRECTION

If you have any query in relation to the Company's Privacy Policy or you wish to access or correct your personal data held by us, you may contact us by writing to the following address:

Offbeat Technology Hong Kong Limited
HKTV Multimedia and Ecommerce Centre
1 Chun Cheong Street
Tseung Kwan O Industrial Estate
New Territories
Hong Kong
For the attention of: Personal Data Officer

Email: privacy@everuts.com

The Company reserves the right to charge you a reasonable fee for complying with a data access request as permitted by the PDPO.

We keep this Privacy Policy under regular review and place updates on our website and/or app from time to time.