

**Wincomply Investments Limited**  
**Privacy Policy Statement**

This Privacy Policy Statement relates to the collection, use, transfer and disclosure of personal data by Wincomply Investments Limited (including its successors and assigns, collectively, "**we**", or "**us**").

In this Privacy Policy Statement, "**personal data**" means any (a) data relating directly or indirectly to a living individual, (b) from which it is practicable for the identity of the individual to be directly or indirectly ascertained; and (c) in a form in which access to or processing of the data is practicable.

**A. Statement of Policy**

We value and respect your trust and are committed to protecting the privacy, confidentiality and security of the personal data we hold. We are equally committed to ensuring that all our employees and agents uphold these obligations. To preserve the confidentiality of all personal data that you provide to us, we will adhere to the privacy principles set out below.

**B. Statement of Practices**

We will:

- (1) ensure that your rights as a data subject are observed in accordance with applicable data privacy laws and regulations;
- (2) be clear and transparent as to how we collect, use and transfer your personal data;
- (3) only collect, process, use, transfer, disclose and store personal data in connection with purposes set out in the Personal Information Collection Statement (the "**PICS**"), a copy of which can be accessed at <https://www.wincomply.com>;
- (4) only transfer and disclose your personal data to the classes of transferees identified in the PICS (the "**Transferees**"), use commercially reasonable endeavours to ensure that the Transferees apply the same or equivalent standards as these principles, and we will not disclose your personal data to anyone unless we (a) have your consent; or (b) are required by applicable laws and regulations to do so (for example, at the lawful request of governmental or judicial bodies);
- (5) use commercially reasonable endeavours to ensure that our collection, retention and processing of your personal data is appropriate and proportionate for the purposes of our business;
- (6) maintain appropriate standards of personal data quality and integrity. We endeavour to keep your personal data held by us accurate according to the information we receive;
- (7) retain your personal data securely, for example, by restricting access of personal data to relevant employees on a "need-to-know" basis and applying encryption to personal data when necessary;
- (8) use commercially reasonable endeavours to procure that the Transferees maintain strict security systems designed to prevent unauthorised access to your personal data by anyone, including our/their personnel;
- (9) implement appropriate processes so only those who act on our behalf with a business need and agree to observe our confidentiality obligations are permitted access to your personal data;
- (10) implement appropriate personal data retention policies and destroy or dispose of your personal data securely once it is no longer required for the purpose(s) for which it was collected or for compliance with applicable laws and regulations, and procure that the

Transferees do the same;

- (11) where we appoint a service provider or agent to handle or process your personal data on our behalf, require them to apply standards which are at least equivalent to these principles; and
- (12) not provide your personal data to third parties for direct marketing or other unrelated purposes without your consent which includes an indication of no objection or no election to opt out.

### **C. Sensitive personal data**

Certain personal data, such as biometric data and information regarding your financial status and location, can be particularly sensitive. You should be aware that in providing our products and services, we use, process, handle and transfer such data, and that you do not have the choice to have such personal data held by us erased prior to it having served all purposes (including any directly related purpose) for which the data was collected, nor to express your choice not to have such data shared or transferred. Such personal data will be held, processed, transferred and erased by us in accordance with the PICS and other parts of this Privacy Policy Statement.

### **D. Third-party websites**

Third-party websites, applications or programs, including those accessible through our website and applications (collectively, "**Third-Party Programs**") are independent from our website and applications, and we have no control over the contents of these Third-Party Programs, their privacy policies or compliance with the law. We have no control over data (including personal data) that you have submitted to these third parties to access our products and services. We endeavour to utilize Third Party Programs with the same or higher data privacy models as us but do not guarantee this.

Your use of any Third-Party Programs or social media services or other services provided by third parties (including any data or personal data that you provide directly to such third parties through the use of their services) are subject to the third-party's own terms and conditions of service and privacy policy (and not this Privacy Policy Statement or the PICS), which you have to read carefully. This Privacy Policy Statement and the PICS apply only to any personal data we collect and does not apply to any of your data (including personal data) that any third-party collects during the process of providing our products and services to you, and we do not take any responsibility for the use of your data (including personal data) by any third-party to whom you provide the information directly. You use Third-Party Programs and social media services at your own risk and are advised to assess their data governance policies, for enhanced understanding of the risks of using these Third-Party Programs and social media services.

### **E. Security**

In order to ensure the correct use and to maintain the accuracy of the data collected from you, as well as preventing unauthorised or accidental access, processing, erasure or other use of the data, we have implemented various internal policies and security technologies and procedures. However, due to technical and risk prevention limitations, even if we have made our best effort to enhance security measures, we cannot ensure that your data is absolutely safe. You should note that the systems and communication networks you use to access our website, mobile applications and services may be subject to problems beyond our control. Therefore, you are advised to protect against unauthorised access to your password and data.

When we share your data with any third parties, we will strive to ensure that such third parties comply with this Privacy Policy Statement, the PICS and other appropriate confidentiality and security measures that we require them to comply with when using your data, except for the data you provide directly to the third parties through the use of their services.

### **F. Cookies**

We use cookies on our websites. Please refer to Terms of Service for more information on how we

use cookies, a copy of which can be accessed at <https://www.wincomply.com>.

## **G. Data Access Requests**

You have the right:

- (1) to check whether we hold personal data about you and to access such personal data;
- (2) to require us to correct any personal data relating to you which is inaccurate;
- (3) to ascertain our policies and practices in relation to personal data and to be informed of the kind of personal data held by us; and
- (4) be informed on request which items of personal data are routinely disclosed to credit reference agencies and debt collection agencies, and be provided with further information to enable the making of an access and correction request to the relevant credit reference agency or debt collection agency.

In accordance with the provisions of the Personal Data (Privacy) Ordinance, we have the right to charge a reasonable fee for the processing of any personal data access request.

You should send requests for access to personal data or correction of personal data or for information regarding policies and practices and kinds of personal data held to:

Wincomply Investments Limited  
Email: [info@wincomply.com](mailto:info@wincomply.com)

We endeavour to use appropriate technical means to ensure that you can access, update and correct your personal data. In accessing, updating, correcting and/or deleting your personal data, we may ask you to authenticate your identity in order to protect the safety of your personal data.

To the extent permitted by relevant laws and regulations, we reserve the right to refuse unreasonable requests (for example, requests which may conflict with or infringe the privacy of others).

Nothing in this Privacy Policy Statement shall limit your rights as a data subject under the Personal Data (Privacy) Ordinance.

## **H. Amendment of Privacy Policy Statement**

We may amend the terms of this Privacy Policy Statement from time to time. The amendments form part of this Privacy Policy Statement. You may access and obtain a copy of this Privacy Policy Statement, as amended from time to time, through our website so that you are always informed of the ways we collect and use personal data. By continuing to use our website, you agree to be bound by this Privacy Policy Statement as amended from time to time.

Please contact us if you have any queries about this Privacy Policy Statement.

**Note:** In case of discrepancies between the English and Chinese versions, the English version shall apply and prevail.

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