



PRIVACY POLICY STATEMENT

PRIVACY POLICY STATEMENT PERSONAL DATA (PRIVACY) ORDINANCE - PRIVACY POLICY STATEMENT

GENERAL

This policy statement provides information on the obligations and policies of SO KLOSE.COM, its subsidiaries, affiliates, and associated companies (the "Company") under the Hong Kong SAR Personal Data (Privacy) Ordinance - Cap.486 (the "Ordinance").

This policy specifically addresses the Company's obligations in respect of the data privacy laws of the Hong Kong SAR. The Company believes the principles embedded in the Ordinance offer no less protection in personal data privacy than those in other jurisdictions. As such, the Company undertakes to apply, where practicable, those principles and the processes set out herein to its operations locally. Where the Company's operations are subject to privacy legislation other than that of Hong Kong SAR, then this policy shall be applied so far as practicable and consistent with such local legislation.

Throughout this policy, the meaning of the term "personal data" is as defined in the Ordinance.

COMPANY CORPORATE POLICY

The Company shall fully comply with the obligations and requirements of the Ordinance. The Company's officers, management, and members of staff shall, at all times, respect the confidentiality of and endeavour to keep safe any and all personal data collected and/or stored and/or transmitted and/or used for, or on behalf of, the Company.

The Company shall endeavour to ensure all collection, storage, transmission and other handling or usage of personal data by the Company shall be done in accordance with the obligations and requirements of the Ordinance.

Where an individual legitimately requests access to and/or correction of personal data relating to the individual, held by the Company, then the Company shall provide and/or correct that data in accordance with the time and manner stipulated within the Ordinance.

STATEMENT OF PRACTICES

TYPES OF PERSONAL DATA COLLECTED

For the purpose of carrying on the Company's businesses, including sale, provision, registration and administration of the Company's personal introduction, dating services and related services, you may be requested to provide personal data such as, but not limited to, the following, without which it may not be possible to satisfy your request:

- (a) Your name;
- (b) Academic qualification proof;
- (c) Current Employment Proof;
- (d) Income or Salary Proof;
- (e) Contact details, including contact name, telephone number and email address; or residential address proof,
- (f) Information for the verification of identity, including identification type and identification number.

Upon request by the Company, the Customer shall provide the Company with information relating to the Customer and its use of the Service reasonably required by the Company:

- (a) to assist the Company in complying with its obligations under any Applicable Law and to



PRIVACY POLICY STATEMENT

report to any Government Agency regarding compliance with those obligations; and (b) to assess whether or not the Customer has complied, is complying and will be able to continue to comply with all its obligations under the Agreement.

If the Customer has not complied with these within two (2) Business Days, the Customer licenses the Company and its authorized representatives, during the term of the Agreement and for three (3) months after its termination, to enter the premises owned or occupied by the Customer during business hours, after giving reasonable notice, for the purpose of obtaining any information requested under subsections (a) and (b) outlined above in this paragraph.

In some instances, you may also be requested to provide certain data that may be used to further improve the Company's services and/or better tailor the type of information presented to you. In most cases, this type of data is optional although, where the requested service is a personalized service, or provision of a service is dependant on your providing all requested data, failure to provide the requested data may prevent the Company from providing the service to you. This type of data includes, but is not limited to:

- (a) Your age;
- (b) Gender;
- (c) Salary range and employment details;
- (d) Education and Profession;
- (e) Hobbies and leisure activities;
- (f) Height and Weight;
- (g) Other related services subscribed to; and
- (h) Family and relationship background.

In support of the services offered by the Company, information may be automatically collected relating to those services so the Company may perform accurate reporting and administration of your accounts such as, but not limited to, call/connection time, duration, origin, and destination.

The Company's web servers may also collect data relating to your online session, the use of which is to provide aggregated, anonymous, statistical information on the server's usage so that the Company may better meet the demands and expectations of visitors to its sites. This type of data may include, but is not limited to:

- (a) The browser type and version;
- (b) Operating system; and
- (c) The IP address and/or domain name.

Some of the Company's web sites may place a "cookie" on your machine; for example to provide personalised services and/or maintain your identity across multiple pages within or across one or more sessions. This information may include, but is not limited to, relevant login and authentication details as well as information relating to your activities and preferences across the Company's web sites.

USE OF PERSONAL DATA

Your personal data may be used for the following purposes or any purposes directly related to them:

- verifying your identity;
- provision of services to you;
- matching (as defined in the Ordinance) your personal data with other data collected for other purposes and from other sources including third parties in relation to the provision of services to you;
- marketing and advertising of any services to you by the Company, its affiliates, related companies, agents, contractors and third party suppliers;
- business planning and improving services for supply to you, by the Company, its affiliates, related companies, agents, contractors and third party suppliers;
- processing of any benefits in connection with the supply of services to you;



PRIVACY POLICY STATEMENT

analysing, verifying and/or checking of your credit, payment and/or status in relation to supply of services of the Company and/or its affiliates to you;

processing of any payment instructions, direct debit facilities and/or credit facilities in relation to supply of services of the Company and/or its affiliates to you, or requested by the Customer;

enabling the daily operation of your account and/or the collection of amounts outstanding in your account in relation to the services of the Company and/or its affiliates, including the use of debt collection agents;

enabling the Company to comply with any obligations to interconnect, with other industry practices, or with obligations to third parties or government agencies in relation to the supply of services of the Company and/or its affiliates to you;

keeping you informed about goods and services supplied to you and other services made available by the Company and/or its affiliates;

prevention or detection of crime;

disclosure as permitted or required by law; and

any other purposes as may be agreed to between you and the Company, including the purposes set out in any application or terms and conditions for the supply of specific goods and services.

ACCURACY OF PERSONAL DATA

Where possible, the Company will validate data provided using generally accepted practices and guidelines. This includes the use of check sum verification on some numeric fields such as account numbers or credit card numbers. In some instances, the data provided will be validated against pre-existing data held by the Company. In some cases, as per the requirements of the Ordinance, the Company is required to see original documentation before the personal data may be used, such as with Personal Identifiers and/or proof of address.

The Customer shall, as soon as practicable, notify the Company of any change of address or any other particulars provided to the Company which may affect the provision of the Service to the Customer.

The Company fully complies with the "Rights of Access and Correction" obligations of the Ordinance. Please refer to the section titled "Access and Correction of Personal Data" below for details on how you can obtain and correct any personal data relating to you that the Company may hold.

RETENTION OF PERSONAL DATA

The Company will destroy any personal data it may hold in accordance with its internal policy. Generally speaking, the Company's policies cover the following principles:

(a) Personal data will only be retained for as long as is necessary to fulfil the original or directly related purpose for which it was collected, unless the personal data is also retained to satisfy any applicable statutory or contractual obligations; and

(b) Personal data are purged from the Company's electronic, manual, and other filing systems in accordance with specific schedules based on the above criteria and the Company's internal procedures.

DISCLOSURE OF PERSONAL DATA

All personal data held by the Company will be kept confidential but the Company may, where such disclosure is necessary to satisfy the purpose, or a directly related purpose, for which the data was collected provide such information to the following parties:

(a) Any subsidiaries, holding companies, associated companies, or affiliates of, or companies controlled by, or under common control with the Company;



PRIVACY POLICY STATEMENT

(b) Any person or company who is acting for or on behalf of the Company, or jointly with the Company, in respect of the purpose or a directly related purpose for which the data was provided;

(c) Any other person or company who is under a duty of confidentiality to the Company and has undertaken to keep such information confidential, provided such person or company has a legitimate right to such information;

(d) the Company's dealers, agents, contractors, suppliers and its professional advisers, including its accountants, auditors and lawyers;

(e) Government and regulatory authorities and law enforcement agencies and other organisations, as required or authorised by law; and

(f) Any financial institutions, charge or credit card issuing companies, credit information or reference bureaux, credit reference agencies, credit providers, collection agencies, security agencies, or any of the Company's actual or proposed assignees or transferees, necessary to establish and support the payment of any services being requested.

Personal data may also be disclosed to any person or persons pursuant to any statutory or contractual obligations or as required by court of law, provided such person or persons are able to prove the required right/authority to access such information. In addition, personal data may be disclosed under any of the circumstances described in Part VIII of the Ordinance in which the concerned personal data are exempt from the provisions of Data Protection Principle 3 of the Ordinance.

TRANSFER OF PERSONAL DATA OUTSIDE OF HONG KONG

At times it may be necessary and/or prudent for the Company to transfer certain personal data to places outside of the Hong Kong SAR in order to carry out the purposes, or directly related purposes, for which the personal data were collected. Where such a transfer is performed, it will be done in compliance with the requirements of the Ordinance.

SECURITY OF PERSONAL DATA

Physical records containing personal data are securely stored in locked areas and/or containers when not in use.

Computer data are stored on computer systems and storage media to which access is strictly controlled and/or are located within restricted areas.

Access to records and data without appropriate management authorization are strictly prohibited. Authorizations are granted only on a "need to know" basis that is commensurate with an individual's Company responsibilities and their training.

Where the Company holds, uses and/or transmits the Customers' personal data it will be adequately protected from accidental and/or unauthorized disclosure, change and/or destruction.

ACCESS AND CORRECTION OF PERSONAL DATA

Under the terms of the Ordinance, individuals have the right to:

(a) Ascertain whether the Company holds any personal data relating to them and, if so, obtain copies of such data ("right of access");

(b) Require the Company to correct personal data in its possession which is inaccurate for the purpose for which it is being used by means of a data access request (right of correction); and

(c) Ascertain the Company's policies and practices in relation to personal data, which are those policies and practices set out in their entirety herein.

An individual may exercise his or her right of access by:

(a) Notifying the company through email, sms, or whatsapp along with appropriate proof of



PRIVACY POLICY STATEMENT

- identity (a copy of the applicant's Hong Kong Identity Card or Passport);
- (b) Alternatively, if you do not wish to provide a copy of your proof of identity, you may meet in person, along with appropriate identification, at the office of So Klose. There, staff will verify your identity.

The Company will, upon satisfying itself of the authenticity and validity of the access request, make every endeavour to comply with and respond to the request within the period set by the Ordinance (i.e. within 40 days after receiving the request).

An individual may exercise their right of correction by writing to the Company at the address listed below, specifying the data obtained through email, sms or whatsapp mentioned above which needs to be corrected.

Satisfactory proof and/or explanation of the inaccuracy is essential before the Company would consider correcting the specified data.

Upon satisfying itself of the authenticity and validity of the correction request, the Company will comply with and respond to the request as required by the Ordinance.

DIRECT MARKETING

In accordance with the requirements of the Ordinance, the Company will honour a customer's request not to use his or her personal data for the purposes of direct marketing. Should you wish not to receive direct marketing material from the Company, please write to the Company at the address listed below.

Any such request should clearly state details of the personal data in respect of which the request is being made. Specifically, it is requested that you include the corresponding Company assigned membership numbers which are printed on the Company's statements/invoices.

THE COMPANY'S PERSONAL DATA (PRIVACY) ORDINANCE CONTACT DETAILS

All enquiries regarding the Company's compliance with its obligations under the Ordinance should be in writing to:

SO KLOSE.COM

Level 27, World Wide House

19 Des Voeux Road

Central

Hong Kong

Or via email to: contact@so-klose.com