

PRIVACY POLICY

Welcome to this website ("**Website**"), which is owned and operated by The Cyclopes Limited (a company registered in Hong Kong with company number 3014219 with its registered address at 3/F, 100QRC, 100 Queen's Road Central, Central, Hong Kong) (also referred to in this Privacy Policy as "**Cyclopes**", "**we**" or "**our**").

Your privacy is very important to us. Your visit to the Website and your use of any of the services or features we provide through or in connection with the Website (collectively, "**Service**" or "**Services**") is subject to our Terms of Use (which can be accessed at www.cyclopeseducation.com).

This Privacy Policy provides information on why we gather your personal and non-personal data, and governs how we collect, use, transfer, store and/or process your personal data that you have provided to us and/or that we may receive about you from third party sources that share such data with us (where applicable), as well as to help you make an informed decision before providing us with your personal data and/or your relevant consents (where applicable).

Any personal data that you provide to us will at all times be governed by the Personal Data (Privacy) Ordinance (Cap. 486) ("**PDPO**") and reference to "personal data" shall have the meaning ascribed to it in the PDPO. This Privacy Policy should be read together with the Terms of Use, provided that, in the event of any inconsistency between this Privacy Policy and the Terms or Use concerning matters relating to personal data, this Privacy Policy shall prevail.

1. PROTECTING YOUR PRIVACY

We are committed to protecting your personal data in accordance with the PDPO. This includes protecting the privacy and ensuring the security of your personal data in compliance with the PDPO. Before using and providing your personal data for the purposes as set out in this Privacy Policy, we may be required by law to notify you and/or obtain your written consent for certain uses, and in the latter cases, we may use your personal data in the manner as specified only after having obtained such written consent.

This Privacy Policy applies to all personal data collected by Cyclopes through the operation of the following services:-

- (a) this Website at www.cyclopeseducation.com, or any other website operated by or on behalf of Cyclopes;
- (b) all services made available by Cyclopes through the Website; and
- (c) all services provided by Cyclopes at our physical consultation centres, through telephone or any other media (whether now known or available in the future), where we provide education related services including without limitation personalised consultation services for college / university admissions and entrance applications ("**Applications**"), including without limitation advice on or related to schools, colleges, universities, educational institutions, programmes, degrees and/or courses to you and assisting you with completing, processing and submitting your Applications, exam preparation, overseas studies and related issues, and other services relating to education, and post-education careers; and
- (d) any new or other services that Cyclopes or its chosen business partner(s) in the education, overseas-study and living, post-education career development and job-search, lifestyle and e-commerce businesses may offer.

For the purpose of this Privacy Policy, the services listed above are referred to collectively as the "**Service**" or "**Services**".

We will collect, use, process and transfer your personal data in the manner and for the purposes set forth in this Privacy Policy. We will not use your personal data for any new purposes (i.e. any other purposes outside of the scope of this Privacy Policy) without your prior consent.

2. WHO IS RESPONSIBLE FOR MY PERSONAL INFORMATION?

The Cyclopes Limited is the “data user” of the personal information that is collected about you (or personal information that you give to us about third parties, where applicable) when you use the Services. This means that we control the ways your personal data are collected in connection with the Services and determine how and why such personal data is used for the purposes of the PDPO.

3. HOW WE COLLECT PERSONAL DATA FROM YOU

3.1 Information you give us directly

We may collect personal data about you that you may provide to us from time to time when you:-

- (a) visit our Website;
- (b) register a user account on our Website (“**User Account**”);
- (c) contact or correspond with us about the Services or any component of it, e.g. via telephone, email, the “General Enquiry” form, written correspondence or any other media (whether now known or available in the future);
- (d) when you submit data through our Website, including without limitation, when you fill out and submit our “Admission Consultation” form to enquire about our Services and/or to contact one of our education consultants, or when you submit any data through any of the features or functions available on our Website including without limitation the “Algo Counsellor”;
- (e) visit one of our physical consultation centres for a personalised consultation with one of our education consultants, including without limitation by providing all necessary information to enable us to complete, process and submit your Applications or other Services;
- (f) complete a survey or questionnaire or provide us feedback when you contact us by email, letter, telephone, SMS, or on or through our Website or any other means of media (whether now known or available in the future) or when you participate in other market research. If you contact us by telephone, we may also record the call for training and service improvement purposes, and make notes in relation to your call; and
- (g) communicate with us via social networking websites, third party apps or similar technologies, or any other means or media (whether now known or available in the future);

3.2 Information we collect from other sources

We may also obtain information about you from other sources:

- (a) **Cookies and similar technologies:** When you visit our Website, we use cookies and similar technologies to *automatically* collect information about:
 - i. your browsing activity and use of the Website. This type of information may include but is not limited to:
 - technical information, including Internet protocol (IP) address used to connect your computer to the Internet;
 - your login information (if you have registered a User Account);
 - browser type and version, time zone setting, browser plug-in types and versions;
 - operating system and platform; and
 - information about your visit including the full Uniform Resource Locators (URL) clickstream to, through and from our Website (including date and time), page response times, download errors, lengths of visits to certain pages, page interaction information such as scrolling, clicks, and mouse-overs, methods used to browse away from the page; and
 - ii. the device you have used to access our Website (including the hardware model and operating system, version, unique identifier, serial numbers, setting configurations and software and mobile configuration, internet protocol (IP) address (from which we may derive your geographic location), browser type and mobile device identifiers).

We also engage third parties who place cookies on our Website to collect the same or similar information and share the information with us. Please see our **COOKIE POLICY** at <https://doc.cyclopeseducation.com/doc/Cookie-Policy-20221010.pdf> for further details.

- (b) **Social Media:** If you mention us or Cyclopes' related information in a posting on any social media platform, such as Facebook, Instagram or YouTube, we may collect publicly available information about your post, including your name, social media handle, your location, the date and time of your post, the content of your post and any images and/or videos included with your post. We will only collect data that the social media provider has expressly permitted us to receive as a result of your privacy settings on those social media platforms. We do not have any control over the privacy practices of the social media platforms; please see their privacy statements for details of how they use your personal information, whom they share it with and how to manage your privacy settings on those platforms.

4. PERSONAL DATA WE COLLECT

Cyclopes will collect your personal data when you register a user account ("**User Account**") and when you use our Services, including without limitation through the means stated in "Section 3 HOW WE COLLECT PERSONAL DATA FROM YOU" above. The types of personal data may include the following:-

We collect the following personal data from you:-

- (a) **Identity and contact information:** your full name, gender, social security number, telephone number, Skype ID, email address, mailing / residential / correspondence address, date of birth, information on identity documents such as your Government issued identity card and passport;
- (b) **Demographics:** religion, ethnicity, nationality, citizenship, residency status, visa status, language proficiency, disabilities (if any);
- (c) **Academic information:** information about your academic activities and achievements including but not limited to the name and address of the secondary schools and/or universities/colleges you have and/or are currently attending (as the case may be), graduation year, coursework / subjects that you have or are completing and grades achieved, grades/scores achieved for standardised tests (e.g. DSE, IB, A Levels, SAT, HSC, TOEFL, IELTS), extra-curricular activities that you participate in and achievements;
- (d) **Work / career related information:** information about your previous and current work and/or career related experience including but not limited to the name of your current and previous employers, their address and contact details, your position and responsibilities, and the start and end date of your employment;
- (e) **Medical information:** including amongst others, any mental illnesses or disabilities, and allergies
- (f) **Financial information:** information about your financial position and ability to fund your attendance at your applied-to schools/ universities / colleges, which may include bank statements;
- (g) **Account login:** If you register for a User Account, or if you choose to connect your Account with an external third party service or application, such as Gmail, we keep a record of your account login username and email address in case you need reminding of these in the future.
- (h) **Correspondence and feedback:** We collect any additional personal information that you may provide to us from time to time when you visit one of our physical consultation centres, if you complete a survey or questionnaire or contact us by email, letter, telephone, or on or through our Website. If you contact us by telephone, we may also record the call for training and service improvement purposes, and make notes in relation to your call; and
- (i) **Marketing and communications preferences:** Subject to your consent for direct marketing (if and where applicable) (see "Section 8 DIRECT MARKETING" of this Privacy Policy), we collect information regarding your preferences in receiving marketing from us and your communications preferences;
- (j) **Information collected from CCTV, cookies and similar technologies and social media** as described in Section 3.2 above; and
- (k) **Other information** in connection with or for the purposes of providing the Services.

In order for us to assist you to complete, process and submit your Applications and/or to provide our Services, we also collect personal data that does not belong or relate to you but to a third party (for

example but without limitation to information of your parents or legal guardian(s), other household members such as your siblings and/or character referee), including their full names, age, occupation, contact details such as phone number and email address, birth country, financial information, and/or education level.

If you provide any personal data that does not belong or relate to you but to a third party, you hereby agree and confirm that you have provided a copy of this Privacy Policy to the third party to whom the personal data belongs or relates, who has read and agreed to all terms in this Privacy Policy, and that you have validly obtained the consent and authority from such third party to provide the relevant personal data to us for the respective purposes.

Certain personal data is required to be provided on an obligatory basis if you wish to receive certain services from us, including without limitation, to enable us to assist you with completing, processing and submitting your Applications. These data will be marked as “mandatory” in the relevant form on the Website and/or any application forms provided to you at our physical consultation centre or other media, and you MUST provide your personal data to us if you want us to provide the service for which you are applying. For any personal data marked as mandatory for collection, if you provide us with any inaccurate/incomplete data or choose not to provide any required data, some components or features of our Website and/or our Services (as the case may be) may not be accessible or available to you. If personal data is only required on a voluntary basis, it will not be marked “mandatory” and it is entirely up to you to decide whether you want to provide such information to us or not.

5. PURPOSES FOR WHICH WE WILL COLLECT AND USE YOUR PERSONAL DATA

We use the personal data that you submit to us or that we collect about you for the following purposes:-

- (a) to verify your identity;
- (b) to register you for, and manage a User Account. If you wish to create a User Account, we need to process your identity and contact information. You will also be asked to provide account login details. Once the account has been created, we use this information to identify you as a new or returning user and manage your account going forwards. This includes keeping a record of your account login details (your email address and password) in case you need reminding of these in the future;
- (c) to provide you with the services, features, tools or functionalities that may be available through our Website, including without limitation, to enable you to contact us to enquire about our Services including without limitation to our personalised consultation services regarding your Applications when you fill in and submit our “Admission Consultation” form, “General Enquiry” form” or use our “Contact My Consultant” feature;
- (d) to provide you with our Services when you visit our physical consultation centres, through telephone, email, or through other means or media (whether now known or available in the future), including without limitation to advise you on admissions into schools, universities, colleges, educational institutions and/or tutorial centres, and to provide you with information pertaining to them, recommend universities /colleges and/or degrees and courses for you to apply to based on your preferences and academic results, and to enable us to assist you with completing, processing and submitting your Applications and the corresponding degrees or courses that you wish to apply for, as well as to assist you with other matters and documentation that are related or ancillary to your Applications such as but without limitation to obtaining necessary visa permits (if any), and arranging flights and accommodation, advising you on overseas studies and related issues, and other education and post-education career matters;
- (e) to, and/or to transfer or otherwise share or make available your personal data to our Affiliates (as defined in Section 6(a) below) to enable us and/or our Affiliates to provide services, features, tools or functionalities to you that may be available through our Website and/or websites operated by our Affiliates, and/or to otherwise provide services to you, assist and/or advise you, in relation to education, employment, careers, job searching and career development;
- (f) to enable our consultants to contact you regarding our Services, including to update you on the status of your Applications and/or to provide advice relating to our Services;
- (g) to send you any newsletters, update information or to distribute other publications materials;
- (h) to manage your relationship with us. We use your identity and contact information to manage our relationship with you in connection with our Services, including notifying you of changes to

the terms of any contracts between us or to any related information, such as changes to this Privacy Policy;

- (i) to provide and improve customer care, for example, to help us address any enquiries and complaints that you have made, or deal with any disputes which may arise in the course of us providing the Services to you;
- (j) to deliver relevant marketing and related communications (subject to your consent for direct marketing – please see “Section 8 DIRECT MARKETING” of this Privacy Policy for further details), which may or may not involve use of automated decision making and profiling through the use of cookies and other similar technologies to track and analyse your use of our Website, the services available through them and your interaction with any marketing communications that we send to you. In addition, we may use the information we collect about your preferences to display content and offers on our Website and other websites and apps that are relevant to you and your interests, which may include targeted advertising on our Website;
- (k) to conduct marketing analysis to allow us to assess trends and the effectiveness of our advertising and marketing campaigns (including using your personal data to evaluate, analyse or predict certain personal aspects relating to you, such as your preferences, economic situation, interests, and/or location);
- (l) to carry out analyses in order to generate statistical or actuarial reports (containing aggregated data that may or may not relate to any identified or identifiable individual);
- (m) to perform data analytics by using cookies and similar technologies (please see our **COOKIE POLICY** at <https://doc.cyclopeseducation.com/doc/Cookie-Policy-20221010.pdf> for further details);
- (n) to better understand the demographics of our users and clients;
- (o) to maintain, enhance and develop our products and service offerings;
- (p) to perform accounting, auditing and other internal functions inclusive training, legal and administrative purposes;
- (q) to administer our business and Website, which includes troubleshooting, data analysis, testing, system maintenance and upgrades, support, reporting and hosting of data, and to maintain and develop our business systems and infrastructure;
- (r) to perform internal research or analyses so that we may improve and optimise the Services that can be made available to you;
- (s) to enable us to comply with our legal obligations, and to detect, prevent and investigate any other actual or suspected violations of law or misuse of our Services and Website. Please note that we will use your personal information only to the extent required for this purpose;
- (t) to protect our rights or properties; and
- (u) other purposes ancillary or related to the above.

We may also combine the information we collect from you and the information you provide to us with information we receive from other sources (such as social media platforms). We may use the combined information for the purposes set out above (depending on the types of information we receive). This may include your contact details, demographic data, your social media interactions, preferences, interests, geographic location and age or age range. We may use this personal information to tailor and show advertisements more relevant to you either on our website or on third party websites (including social media platforms).

We will not use your personal data for any new purposes without obtaining your prior express consent.

6. WHO DO WE TRANSFER, DISCLOSE AND SHARE YOUR PERSONAL DATA WITH?

We may need to share your personal data with the following third parties for the performance of our Services:-

- (a) **Cyclopes’ affiliates:** any other members within our group of companies, which means any subsidiaries and/or affiliated companies that operate within the education industry, job search, career development and employment industry and/or the business of data analytics and analyses (“**Affiliates**”)
- (b) **overseas education institutions:** including the schools, colleges or universities that you apply for in your Applications, their authorised agents or contractors and/or their subagents;

- (c) **testing and educational service providers or platforms:** including organisations and platforms that operate or facilitate the application process for universities/colleges including but not limited to the Universities and Colleges Admissions Service (UCAS) in the United Kingdom, Common Application in the United States and the Universities Admissions Centre (UAC) in Australia;
- (d) relevant governmental bodies that issue student visas;
- (e) **airlines and agencies, companies or other organisations that provide accommodation rental services:** we will need to share your personal data when we help you book flights to the relevant country of your accepted school/university/college and/or apply for accommodation (if requested) on your behalf;
- (f) **third party service providers:** for the purpose of operating our business and Services, we may need to share or transfer your personal data to our third party service providers who use that data to conduct our business on our instructions, e.g. IT providers, cloud storage service providers, marketing agents, social media, communications platforms, email service providers, research companies, and service providers of development and maintenance, administrative, data processing, digital storage, communications, or other similar services. For example, we may share your personal data when we store your personal data on cloud servers operated by third party service providers. These third party services providers act as “data processors” on our behalf under the PDPO and may be provided with access to your personal data to fulfil their contractual obligations to us but may not use such data for any other purpose. We endeavour to put in place and maintain relevant contractual measures and/or other relevant non-contractual means as appropriate to regulate and ensure our data processors’ compliance in processing personal data;
- (g) **analytics and search engine providers** that assist us in the improvement and optimisation of our Website and/or Services;
- (h) **recipients resulting from legal requirements or sale of business:** we may share your personal data:
 - i. where we are under duty to disclose or share your personal data in order to comply with any legal obligation, or any disclosure under and for the purposes of any guidelines or guidance given or issued by any legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations with which we are expected to comply;
 - ii. in order to enforce or apply our other terms and conditions or other agreements, or to protect our rights, property, or safety (or the rights, property, safety of our customers/clients or others);
 - iii. in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer;
 - iv. in the event that Cyclopes (or its affiliates), or substantially all of its assets, are acquired by a third party, in which case personal data held by it about its customers/clients will be one of the transferred assets.

7. CROSS-BORDER TRANSFERS OF PERSONAL INFORMATION

The personal information we collect about you is stored on servers which may be located within or outside of Hong Kong. In addition, for the purposes set out in this Privacy Policy, we may transfer personal information we hold about you outside Hong Kong to the third parties identified in “Section 6 WHO DO WE TRANSFER, DISCLOSE AND SHARE YOUR PERSONAL DATA WITH” above including but not limited to the EU, United States, United Kingdom and Australia.

8. DIRECT MARKETING

Subject to your consent, we may use your personal data to send you direct marketing (including, but not limited to, special offers, news, information and marketing) about us, our Affiliates and/or our Marketing Partners (see below) in relation to the Marketing Subjects (see below) whether by in-app messages and/or notifications, push notifications to your device, post, email, telephone, text message, or other media whether now known or available in the future.

Subject to your consent, we may also use your personal data for, or provide your personal data to, our Affiliates and/or Marketing Partners (see below) so that they may send you direct marketing (including, but not limited to, special offers, news, information and marketing) about us, our Affiliates and/or our Marketing Partners in relation to the Marketing Subjects (see below) whether by in-app messages and/or notifications, push notifications to your device, post, email, telephone, text message, and/or other media whether now known or available in the future.

Our “**Marketing Partners**” include education institutions and education service providers, retail outlets and online businesses (products and services including education, fashion and beauty, health and personal care, sports and recreation, luxury, home and living, food, wine and beverage, books and stationery, technology, leisure and entertainment, telecommunication and information technology), private clubs, concierge and customer service providers, shopping malls, department stores, hotel chains, airlines, travel services, accommodations and hotels, catering services providers, healthcare, insurance companies, banks, finance and investment institutions, as well as services and/ or products providers including in education, careers, art and culture, gallery and exhibition, green and nature, sports and recreation, health, travel and accommodation, leisure and entertainment, transportation and logistics, telecommunication and information technology.

As we may share your personal data with our Affiliates and/or our Marketing Partners, we may also receive your personal data from them. Subject to your consent given to our Affiliates and/or our Marketing Partners, we may also use such personal data to send you direct marketing about us, our Affiliates and/or our Marketing Partners in relation to the Marketing Subjects (see below).

The types of products, services, events and initiatives that we, our Affiliates and/or our Marketing Partners may market to you include the following (together, the “**Marketing Subjects**”):

- (a) goods and services offered by us and/or our Affiliates in relation to our Services;
- (b) services relating to education and career development including without limitation to advice and/or consultation on education, career choice and development, job search, and/or personal enhancement;
- (c) tutoring, mentoring, home cleaning, janitorial services, landscape and plant maintenance services, housekeeping, plumbing services, locksmiths, barber and salon services, gym and fitness services, laundry services, florists, motor vehicle services;
- (d) long term and short term accommodation;
- (e) travel, hospitality and accommodation services and products, including but not limited to hotels and serviced apartments, holiday package products and services offered by travel agents, tickets to attractions, airfares and ticket reservations;
- (f) transportation and logistics service, including but not limited to air travel and non-air transportation services such as hotel transfers, car rentals, bus operators, train operators and cruise operators, and courier services and shipping services;
- (g) finance, banking, securities, mortgage, insurance and other related services and products by banks, finance and investment institutions, securities companies and insurance companies;
- (h) access and privileges at private clubs;
- (i) consumer products and services by retail outlets and/or online businesses, including clothing, shoes, fashion, fashion accessories and beauty, jewellery, college and university merchandise, health and personal cares, luxury, home and living, household products, food, wine, liquor and beverages, confectionary, groceries, books and stationery, toys, fragrances and cosmetics, baby products, telephones and mobile devices, electronics and electrical appliances, computer software, and games, bags and luggage, furniture, sports and leisure equipment;
- (j) health and fitness services including without limitation gym membership and services offered by personal trainers and instructors;
- (k) pharmaceutical products, medical and pharmaceutical services, and therapy services by therapists;
- (l) reward, loyalty, privileges programmes and promotions at shopping malls and department stores;
- (m) restaurants, catering services on food, wine and beverage;
- (n) conference and exhibition management services, consultancy and marketing research services, event and project management services, gaming services, advertising and public relations services, media production services;

- (o) tickets for concerts, galleries, exhibitions, films, theatricals, sporting, special and cultural events;
- (p) green and nature activities;
- (q) technology, telecommunication, internet and mobile communication services, social networking and media;
- (r) graphic and interior design services, photography services, printing and publishing services;
- (s) legal services, medical services, accounting, auditing, bookkeeping and taxation services, engineering services, architectural services, surveying services, equipment rental services, hospitality services;
- (t) charitable initiatives which support areas including sports, recreation, art and cultural programmes relief of poverty, advancement of education, advancement of religion and other purposes that are beneficial to the community.

We cannot use or provide your personal data for direct marketing purposes unless you consent. Even if you have given us your consent, you can opt out of direct marketing at any time (or you may request that we cease to provide your personal data to third parties, at which point we will cease to do so), free of charge, by clicking on the “unsubscribe” link at the bottom of any marketing email, SMS or any other electronic marketing communications we send you or by contacting us via any of the contact channels specified in “Section 15 YOUR RIGHT TO ACCESS AND CORRECTION” below of this Privacy Policy.

9. CHILDREN’S DATA

We permit a child under the age of 18 to use our Website and Services, and to provide his/her personal data to us provided that the child has obtained his/her parent’s or legal guardian’s consent. If you are a child under the age of 18, you should not provide any of your personal data to us unless and until your parent/legal guardian has consented to your use of our Website and Services and your provision of personal data, and by so providing your personal data to us, your parent/legal guardian are deemed to have given such consent. If you are a parent/legal guardian, you may revoke your consent at any time by contacting us at the contact channel specified in “Section 15 YOUR RIGHT TO ACCESS AND CORRECTION” of this Privacy Policy.

10. WHERE WE STORE AND PROCESS YOUR PERSONAL DATA

The data that we collect from you is stored on servers located within or outside of Hong Kong.

11. SECURITY

We endeavour to have in place and maintain administrative, technical or physical security measures which aim to protect the personal data that you provide against accidental or unauthorised destruction, erasure, loss, alteration, access, disclosure, processing or use.

For any third party service providers which perform services on our behalf based on our instructions (i.e. as data processors), we do not authorise these service providers to use and/or disclose your personal data, except as necessary to perform their services and/or for the permitted purposes as stated in this Privacy Policy only for or on our behalf, or otherwise in compliance with the applicable legal requirements; but not for their own or other purposes..

Unfortunately, the transmission of information via the internet is not completely secure. Although we will use commercially reasonable efforts to protect your personal data, we cannot guarantee and shall not be liable for the security of your data transmitted to or from our Website or servers.

12. THIRD PARTY WEBSITES

At times, we may provide links from our Website to other websites and applications operated by third parties. These links are provided only for your convenience. However, we do not have control over these websites and applications, which are independent from Cyclopes and are subject to separate privacy policies and terms and conditions. When you leave our Website, this Privacy Policy no longer applies and we are not responsible or liable for your information that third parties may collect through their websites and applications. We strongly encourage you to review the privacy policies and terms and conditions of any third-party websites and applications before using them.

13. DATA RETENTION AND DESTRUCTION

How long we store your data for will vary depending on the category of personal data and what the purposes are for and in accordance with applicable law. We may anonymise your data, upon which, we may continue to use the anonymized data for any purpose and may transfer any anonymized data to any third party.

14. HOW CAN I ACCESS, UPDATE OR DELETE INFORMATION IN MY USER ACCOUNT?

You may create a User Account on our Website to manage your preferences for example for particular universities, colleges, degrees and courses and to view the status of your Applications. You can login to or manage your account by clicking the "LOGIN" link at the top of any page on our Website.

After logging in, you will be able to modify, amongst others, your identity and contact information. To delete your User Account, please contact us via any of the contact channels specified in Section 15 "YOUR RIGHT TO ACCESS AND CORRECTION" below of this Privacy Policy.

You are responsible for protecting your user name and password for your User Account and for keeping your data and information correct and up-to-date. Pursuant to the Terms of Use (accessible at <https://doc.cyclopeseducation.com/doc/Terms-of-Use-20221010.pdf>), you will be responsible for all activity occurring through the use of your username and password and we shall not be responsible or liable for any loss or damage that you may suffer as a result of any unauthorised access to your User Account, which we have no control over, or any incorrect data or information provided.

15. YOUR RIGHT TO ACCESS AND CORRECTION

You have the right in relation to your personal data, which include the right to

- (a) check whether we hold any of your personal data;
- (b) access your personal data held by us;
- (c) require us to correct any personal data which is inaccurate;
- (d) ascertain our policies and practices (from time to time) in relation to personal data and the type of personal data held by us; and
- (e) opt out and withdraw consent from receiving direct marketing materials from us at any time.

If you would like to make a request in relation to the above (or make any general enquiries or complaints), please send us your request or enquiry in writing by post or email addressed to our Data Protection Officer (Marked Confidential) at:-

- (a) 3/F, 100QRC, 100 Queen's Road Central, Central, Hong Kong; or
- (b) smart455@thecyclopes.com

Please indicate your name and contact number and/or email address for us to follow up your request.

We may refuse to comply with your data access or correction request if we are not supplied with reasonably sufficient information to locate the requested data or to ascertain in what way the requested data is inaccurate.

In accordance with the PDPO, we have the right to charge you a reasonable fee for the processing of any personal data access request.

16. CHANGES TO THIS PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

This Privacy Policy was last updated on 10 October 2022.

As part of our efforts to ensure that we properly manage, protect and process your personal data, we will be reviewing our policies, procedures and processes from time to time.

We reserve the right to amend the terms of this Privacy Policy at our absolute discretion. We will notify you of changes to this Privacy Policy by posting the amended policy with the date it was revised on our Website. By continuing to access and/or use our Website and/or our relevant Services after the latest updated version date of our Privacy Policy, you are deemed to have read and accepted our Privacy Policy as updated. For any matters that we may be required to seek further consent from you before so proceeding, we will contact you separately (if/where applicable). You are encouraged to visit our Website from time to time to ensure that you are well informed of our latest policy in relation to personal data protection. If you do not agree with our then effective Privacy Policy, please do not continue to access and use our Websites and/or our Services.

It is important that the personal information we hold about you is accurate and up to date. Please let us know if your personal information changes during your use of the Services via any of the contact channels specified in "Section 15 YOUR RIGHT TO ACCESS AND CORRECTION" above in this Privacy Policy.