

## **Privacy Policy Statement**

This Privacy Policy Statement relates to the collection, use, transfer and disclosure of personal data by RD Technologies, which is applicable to our group companies including but not limited to RD ezLink Limited, RD Wallet Technologies Limited, other affiliated companies and their respective successors and assigns (collectively, "**RD Technologies**" and "**we**", "**our**" or "**us**" shall be construed accordingly).

In this Privacy Policy Statement, "**personal data**" means any (a) data relating directly or indirectly to a living individual (which includes sensitive personal data such as biometric data, IP addresses, real time location), (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 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 personal data;
- (3) only collect, process, use, transfer, disclose and store personal data in connection with purposes set out in the relevant notice(s) relating to the Personal Data (Privacy) Ordinance or Personal Information Collection Statement(s) (together, "**Notice(s)**");
- (4) only transfer and disclose personal data to the classes of transferees identified in the Notice(s) ("**Transferees**") (and to the extent that the transfer is made to a place outside Hong Kong, we will ensure that the transfer is lawful), and ensure that the Transferees apply the same or equivalent standards as these principles, and we will not disclose 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, and we will not collect, retain or process excessive amounts of personal data;
- (6) maintain appropriate standards of personal data quality and integrity. We endeavour to keep your personal data held by us accurate;
- (7) retain 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) maintain, and procure that the Transferees maintain, strict security systems designed to prevent unauthorised access to personal data by anyone, including our/their personnel;
- (9) implement appropriate processes so only those who (a) act on our behalf with a business need and (b) are required to observe our confidentiality obligations would be permitted access to such personal data;
- (10) implement appropriate personal data retention policies and destroy or dispose of any personal data securely once it is no longer required for the purpose(s) of which it was collected for or for compliance with applicable laws and regulation, and procure that the Transferees do the same;
- (11) where we appoint a service provider or agent to handle or process 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.

### **C. Visitor data**

When you visit our website and application without logging into your user account, we will record your visit only as a "hit". The webserver makes a record of your visit that includes your IP addresses (and domain names), the types and configurations of browsers, language settings, geo-locations, operating systems, previous sites visited, and time/durations and the pages visited ("**visitor data**"). We use the visitor data for the purpose of maintaining and improving our website and application such as to determine the optimal screen resolution, which pages have been most frequently visited etc. We use visitor data only for website and application enhancement and optimisation purposes. We do not use and have no intention to use the visitor data to personally identify anyone.

### **D. 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 Notice(s) and other parts of this Privacy Policy Statement.

### **E. Third-party websites**

Third-party websites, applications or programs, including those accessible through our websites and applications (collectively, "**Third-Party Programs**"), are independent from our websites 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.

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), which you have to read carefully. This Privacy Policy Statement applies 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 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.

### **F. 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 Platforms 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 Statement 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.

## **G. Cookies**

We use cookies on our websites and applications. Please see our Cookie Policy for more information on how we use cookies.

## **H. Under 18 of Age**

We endeavour to protect the privacy of persons under eighteen (18) years of age. Our website and mobile applications are not intended for persons under eighteen (18) years of age.

## **I. Data Access Requests**

You have the right:

- (i) to check whether we hold personal data about you and to access such personal data;
- (ii) to require us to correct any personal data relating to you which is inaccurate;
- (iii) 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
- (iv) be informed on request which items of personal data are routinely disclosed to debt collection agencies, and be provided with further information to enable the making of an access and correction request to the relevant 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:

The Data Protection Officer  
RD Technologies  
Address: Units 2801-05A, Level 28, K11 Atelier King's Road, 728 King's Road, Quarry Bay, Hong Kong  
Email: [care@rd.group](mailto:care@rd.group)

We will 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 for 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 or infringe the privacy of others).

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

## **J. 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 mobile application or at our website so that

you are always informed of the ways we collect and use personal data. By continuing to use our website or mobile applications, you agree to be bound by this Privacy Policy Statement as amended from time to time.

#### **K. Mainland China**

If you are within Mainland China, you will be additionally subject to the relevant China Personal Information Protection Policy ("China PIPP"). In the event of any inconsistency between the Notice(s) and this Privacy Policy Statement on one hand, and China PIPP on the other hand, the provisions which better allow us to comply with all applicable laws and regulations, shall apply. This will, in most cases, be the provisions which impose a stricter standard on us.

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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