

## **Privacy Policy (20-Feb-2022)**

### **1. Introduction and application**

1.1 This policy ("Privacy Policy") describes how AlgoBot Limited ("AlgoBot") manages Personal Data which is in our possession or under our control. "Personal Data", is defined in the Personal Data (Privacy) Ordinance (Cap. 486 of Laws of Hong Kong) ("PDPO"), and currently refers to any data relating directly or indirectly to a living individual; from which it is practicable for the identity of the individual to be directly or indirectly ascertained; and in a form in which access to or processing of the data is practicable.

1.2 By using our services pursuant to your agreement(s) with us ("Services"), operating any account maintained with us, accessing the online platform operated by us (which is accessible through our website at [www.algobot.hk](http://www.algobot.hk) or through our mobile application) ("Platform"), websites or mobile applications, or otherwise providing information to or communicating with us, this Privacy Policy will apply to our collection, use, processing and disclosure of your Personal Data.

1.3 This Privacy Policy does not supersede or replace any other consents you may have previously or separately provided to us in respect of your Personal Data, and this Privacy Policy is in addition to any other rights which we may have at law to collect, use, process or disclose your Personal Data.

1.4 The words "we", "us", "our" or any of their derivatives refer to AlgoBot and its successors and any novatee, assignee, transferee or purchaser of AlgoBot's rights and/or obligations hereunder and any reference to AlgoBot includes a reference to such successor, novatee, assignee, transferee or purchaser. The words "you", "your", "yours" or any of their derivatives refer to the person using our Services, operating any account maintained with us, accessing our Platform, website or mobile applications, or otherwise providing information to or communicating with us and shall include, as the context may require, personal representatives (as the case may be).

### **2. Personal data that we collect**

2.1 We collect, use, disclose, transfer and otherwise process Personal Data about you or Personal Data relating to individuals who are connected or associated with you including but not limited to your legal representatives that you provide to us ("Associated Persons") in accordance with this Privacy Policy.

2.2 The Personal Data that we collect or may collect include:

(a) personal contact data including name, telephone number, email address, residential address and correspondence address;

(b) specimen signature(s);

(c) occupation, education and income levels;

(d) identification card or passport number, date of birth, place of birth and other information for the verification of identity;

(e) financial and banking information (e.g. Information on net assets, income, expenses, credit history, bank account and banking transactions, securities trading account);

(f) images and voice recordings of our conversations with you;

(g) tax and insurance information;

(h) information about your risk profile, investments, investment objectives, knowledge and experience and/or business interests and assets;

(i) personal opinions made known to us (e.g. your feedback or responses to any surveys);

(j) browsing history, patterns or other unique information;

(k) your internet protocol address and information associated with such address;

(l) any other personal data reasonably required in order for us to provide the services requested by you; and

(m) any other personal data permitted by or required to comply with any applicable local or foreign laws, rules, acts, regulations, subsidiary legislation notices, notifications, circulars, licence conditions, directions, requests, requirements, guidelines, directives, codes, information papers, practice notes, demands, guidance and/or decisions of any national, state or local government, any agency, exchange, regulatory or self-regulatory body, law enforcement body, court, central bank or tax revenue authority or any other authority whether in Hong Kong or elsewhere, whether having the force of law or not (including any intergovernmental agreement between the governments or regulatory authorities of two or more jurisdictions or otherwise), as may be amended from time to time ("Applicable Laws") and our internal control and compliance policies.

### **3. Sources of information**

3.1 The Personal Data has or will be obtained from the following sources, where applicable, or such other sources which we may see fit from time to time:

(a) information provided or submitted by you through among others, your dealings and agreements with us, which includes information provided when registering as a user, providing information regarding any account which you may open with us, providing answers to security questions, completing any confirmations, declarations or forms, or through your utilization of any of our Services, accessing or viewing our Platform;

(b) as applicable, publicly available or publicly accessible information (to the extent permitted by Applicable Laws); and

(c) such other written, electronic or verbal communications or documents delivered to us prior to and during the course of our contractual or pre-contractual dealings with you.

3.2 As the accuracy of your Personal Data depends largely on the information you provide to us, you should inform us as soon as practicable if there are any errors in the Personal Data or if there have been any changes to the Personal Data. We intend to keep the Personal Data accurate and up-to-date, and retain the Personal Data no longer than necessary for the above purposes or as required or permitted by any applicable law.

### **4. Purpose of collecting, using, and disclosing your personal data**

4.1 We may use your Personal Data for our business purposes, including the provision and continuing operation of the Platform and the Services provided to you. This includes, the following purposes ("Purposes"):

(a) provision of the Services as requested by you;

(b) carrying out any transactions on your behalf contemplated on the Platform and the Services thereto;

(c) assessing and processing applications, instructions or requests from you;

(d) communicating with you, including providing you with updates on changes to our Services;

(e) to verify your identity for the purposes of providing Services to you;

(f) conducting due diligence checks, screenings or credit checks as may be required by any Applicable Laws or our internal policies and procedures;

(g) for the specific purpose for which it was volunteered or provided to us;

(h) to detect and protect us or any third parties against negligence, fraud, theft and other illegal activities;

(i) to understand your needs and preferences;

(j) improving the content, appearance and utility of the Platform;

(k) to manage and develop infrastructure and business operations;

(l) to administer any account which you may open with us;

(m) to process payments;

(n) to comply with our internal policies and procedures;

(o) to respond to queries or feedback;

(p) to address or investigate any complaints, claims or disputes;

(q) as permitted by any Applicable Laws;

(r) to comply with any Applicable Laws or any request from any relevant governmental or regulatory authority;

(s) financial reporting, regulatory reporting, management reporting, risk management, audit and record keeping purposes;

(t) enforcing obligations owed to us;

(u) seeking professional advice, including legal advice;

(v) any other reasonable purposes in connection with the provision of our Services;

(w) with your consent, providing you with marketing materials in connection with the services we may provide;

(x) fulfilling any purpose directly related to the above Purposes; or

(y) any other purposes that are required by any Applicable Laws.

## **5. Use of personal data in direct marketing**

We intend to use your Personal Data in direct marketing and we require your consent (which includes an indication of no objection) for that purpose. In this connection, please note that:

(a) your personal contact data, financial and banking information, information about your risk profile, investments, investment objectives, knowledge and experience and/or business interests and assets and demographic data may be used in direct marketing to the extent permitted by Applicable Laws;

(b) the following classes of services, products and subjects may be marketed to the extent permitted by Applicable Laws:

(i) financial services and products;

(ii) donations and contributions for charitable and/or non-profit making purposes;]

(c) the above services, products and subjects may be provided by AlgoBot and/or:

(i) any of our related corporations;

(ii) third party financial services providers;

(iii) charitable or non-profit making organisations; and

(d) in addition to marketing the above services, products and subjects themselves, AlgoBot also intends to provide the data described in (a) above to all or any of the persons described in (c) above for use by them in marketing those services, products and subjects to the extent permitted by Applicable Laws, and we require your written consent (which includes an indication of no objection) for that purpose.

We may receive money or other property in return for providing the data to the other persons in (c) above and, when requesting your consent or no objection as described in (d) above, we will inform you if we will receive any money or other property in return for providing the data to the other persons.

You may, at any time, withdraw your consent to receive marketing information from us. If you wish to do so, please click on the "Unsubscribe" option available on all marketing/newsletter emails that you may receive from us or contact our Data Protection Officer at [admin@algotbot.hk](mailto:admin@algotbot.hk).

## **6. Disclosure and sharing of your personal data**

We may from time to time disclose and share your Personal Data to our directors, officers, employees, representatives, agents or delegates or other third parties as described below, whether located in Hong Kong or otherwise, to carry out the Purposes. This includes, disclosing and sharing your Personal Data with the following:

(a) any of our directors, officers, employees, representatives, agents or delegates;

(b) any of our shareholders or related corporations, and any of their successors or assigns, and their directors, officers, employees, representatives, agents or delegates;

(c) our professional advisers, consultants and auditors;

(d) any service providers, agents, contractors, delegates, or suppliers which we may appoint from time to time to provide us with services in connection with the Platform or the Services that we offer to you (for example, custodian and brokerage services), and their directors, officers, employees, representatives, agents or delegates;

(e) any sub-contractors which any of our service providers, agents, suppliers, delegates or contractors may appoint from time to time to provide them with services in connection with the Platform or the Services that we offer to you, and their directors, officers, employees, representatives, agents or delegates;

(f) anyone who takes over or may take over all or part of our rights or obligations under any agreement we have with you or anyone any agreement we have with you (or any part thereof) is transferred to or may be transferred to;

(g) any person who we believe in good faith to be your legal advisers or other professionals;

(h) any relevant governmental or regulatory authority, in so far as we need to do so to keep to any Applicable Laws, or which we in good faith believe that we should keep to; and

(i) pursuant to a request by any relevant governmental or regulatory authority (regardless of the reason for such request and whether such request is exercised under a court order or otherwise),

provided that in the case of disclosures under any of the circumstances in (a) to (d), we shall procure that the recipient is subject to the same duty of confidence.

## **7. Transfer of your personal data outside Hong Kong**

We may transfer, store, process and/or deal with your Personal Data outside Hong Kong.

## **8. Retaining your personal data**

Your Personal Data is retained as long as the purpose for which it was collected remains and until it is no longer necessary to comply with any Applicable Laws.

## **9. Rights of access and rectification**

You have the right to request access to Personal Data we hold, or request the rectification of any inaccurate data. If you would like to do so, please contact our Data Protection Officer at [admin@algotbot.hk](mailto:admin@algotbot.hk)

## **10. Use of cookies and related technologies**

10.1 Our Platform, websites and mobile applications (“apps” or an “app”) use cookies. A cookie is a small text file placed on your computer, system or mobile device when you visit a web site or use an app. Cookies collect information about users and their visit to the web site or use of the app, such as their Internet protocol (IP) address, how they arrived at the web site (for example, through a search engine or a link from another web site) and how they navigate within the web site or app. We use cookies and other technologies to facilitate your internet sessions and use of our apps, offer you products and/or services according to your preferred settings, track use of our web sites and apps and to compile statistics about activities carried out on our web sites and/or through our apps.

10.2 A pixel tag, also known as a web beacon, is an invisible tag placed on certain pages of our web site but not on your computer. Pixel tags are usually used in conjunction with cookies and are used to monitor the behaviour of users visiting the web site.

10.3 You may set up your web browser to block cookies which will in turn disable the pixel tags from monitoring your web site visit. You may also remove cookies stored from your computer or mobile device. However, if you do block cookies and pixel tags, you may not be able to use certain features and functions of our web sites or the Platform.

10.4 We also use analytics programs such as Google Analytics for web analytics purposes to manage and improve our websites, mobile applications, the Platform and/or our Services. Features of Google Analytics that we may use include Remarketing with Google Analytics, Google Display Network Impression Reporting, and Google Analytics Demographics and Interest Reporting. Accordingly, your information may be collected for reports such as impression reporting, demographic reporting, interest reporting and to assist with tailoring our online advertising to provide you with a better experience. You may refer to <https://www.google.com/policies/privacy/partners> for more information about how your data is collected through Google Analytics.

10.5 We and our third-party vendors, including Google, use first-party cookies (such as the Google Analytics cookie) or other first-party identifiers, and third-party cookies (such as Google advertising cookies) or other third-party identifiers together, to inform, analyse, optimise, and serve custom ads based on your interests, searches and prior usage patterns when visiting our websites, mobile applications and Platform, and for other market research analysis purposes such as impression



reporting and how your interactions with these ads are related to visits to our websites, mobile applications and Platform, amongst others. As a consequence, third party vendors may show our ads on other websites or mobile applications. We neither support or endorse the goals, causes or statements of these websites or mobile applications which display our ads.

10.6 Using the Google Ad Settings (<https://www.google.com/settings/u/0/ads/authenticated>), you may control the ads you view, block specific advertisers, learn how ads are selected for you, and opt-out of Google Analytics for Display Advertising. To opt out from any collection or use of information by Google Analytics, please download and install the Google Analytics Opt-Out Browser Add-on available at <https://tools.google.com/dlpage/gaoptout>. By opting out, you will not be subject to online advertising or marketing analysis by Google Analytics and you will no longer receive ads tailored to your browsing patterns and usage preferences.

### **11. Third party sites**

Our web sites may contain links to other web sites which are not maintained by us. This Privacy Policy only applies to our websites, mobile applications, the Platform and/or our Services. When visiting these third party web sites, you should read their privacy policies which will apply to your use of the web sites.

### **12. Changes**

Our Privacy Policy may change from time to time. We will post any privacy policy changes on this page, for which you will be notified. If you continue to use our Services, operate any account maintained with us, access our Platform, websites or mobile applications, and/or otherwise provide information to or communicate with us, you are deemed to have agreed to such changes without reservation unless your express consent is required by Applicable Laws.

### **13. Contact us**

If you have any questions about any aspects of this policy or your Personal Data, please contact our Data Protection Officer at [admin@algotbot.hk](mailto:admin@algotbot.hk) +852 6753 2838.