

## **Privacy Policy**

### **1. Introduction**

This Privacy Policy (together with our Terms and Conditions and any other documents referred to in it including but not limited to the Cookies Policy and the Disclaimer) describes the type of information that we collect from you through the use of our services (“**Services**”), or the use of our website (i.e. [www.cloudlight.com.hk](http://www.cloudlight.com.hk)) (“**Website**”), how that information may be used or disclosed by us and the safeguards we use to protect it. Throughout the Website and in this Privacy Policy, the terms “**we**”, “**us**” and “**our**” refer to Cloud Light Technology Limited.

We are committed to protecting and safeguarding the privacy of the personal data (“**Personal Data**”) we collect from you. For the purpose of this Privacy Policy, the term “**Personal Data**” has the meaning ascribed to it under the Personal Data (Privacy) Ordinance (Chapter 486, Laws of Hong Kong).

Our Website and Services may contain links to third-party websites that are not covered by this Privacy Policy. We, therefore, ask you to review the privacy statements of other websites and applications to understand their information practices.

We have drafted this Privacy Policy to be as clear and concise as possible. Please read it carefully to understand our policies regarding your information and how we will treat it. By using or accessing our Website or the Services, you agree to the collection, use and disclosure of information in accordance with this Privacy Policy. We reserve the right to review, amend, adjust and/or change this Privacy Policy from time to time and your continuous use of the Website or the Services is deemed to be acceptance of such changes, so please check periodically for updates.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of our Privacy Policy is deemed to occur upon your first use of our Website. If you do not accept and agree with this Privacy Policy, you must stop using our Website immediately.

If you have any comments on this Privacy Policy, please email them to [info@cloudlight.com.hk](mailto:info@cloudlight.com.hk)

## **2. Who We Are**

2.1. Here are the details related to us and the Website:

- a) Our Website address is [www.cloudlight.com.hk](http://www.cloudlight.com.hk).
- b) Our company name is Cloud Light Technology Limited.
- c) Our registered address is Units 1515-1519, Building 19W, 19 Science Park West Avenue, Hong Kong Science Park, Pak Shek Kok, New Territories, Hong Kong.
- d) Our trading/postal address is Units 1515-1519, Building 19W, 19 Science Park West Avenue, Hong Kong Science Park, Pak Shek Kok, New Territories, Hong Kong.

## **3. What we may collect**

3.1. Personal Data means any personal information and/or any personal data about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

3.2. We may collect, use, store and transfer different kinds of Personal Data about you which we have grouped together as follows:

- a) Identity Data includes first name, last name or similar identifier. When you email, phone or otherwise, we may collect information such as your first name, last name, email address and phone number.
- b) Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this Website.
- c) Profile Data includes your username and password, reservations made by you, your interests, preferences, feedback and survey responses.

- d) Usage Data includes information about how you use our Website and Services.
  - e) Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.
  - f) Interaction Data includes any information that you might provide to any discussion forums on the Website (if any).
  - g) Cookies Data like many websites, we use “**cookies**” to enhance your experience and gather information about visitors and visits to our Website.
  - h) We may receive information about you if you use any of the other websites we operate or through the Services we provide. Such information may be shared internally and combined with data collected on our Website. We are also working closely with third parties (including, for example, business partners, suppliers, sub-contractors, advertising networks, analytics providers, and search information providers) and may receive information about you from them.
  - i) Analytics includes third-party analytics services (such as Google Analytics) to evaluate your use of the Website, compile reports on activity, collect demographic data, analyse performance metrics, and collect and evaluate other information relating to our Website and internet usage. These third parties use cookies and other technologies to help analyse and provide us the data. By accessing and using the Website, you consent to the processing of data about you by these analytics providers in the manner and for the purposes set out in this Privacy Policy.
- 3.3. We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your Personal Data but is not considered Personal Data as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your Personal Data so that it can directly or indirectly identify you, we treat the

combined data as Personal Data which will be used in accordance with this Privacy Policy.

3.4. We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

3.5. We will process your Personal Data in the following situations:

- a) You have given consent to the processing of your Personal Data for one or more specific purposes;
- b) Processing is necessary for the operation of the Website;
- c) Processing is necessary for compliance with a legal obligation to which we are subject;
- d) Details of your visits to our Website and the resources you use;
- e) Information about your computer (e.g. your IP address, browser, operating system, etc.) for system administration and to report aggregate information to our advertisers;
- f) Processing is necessary to protect the vital interests of you or of another natural person;
- g) Processing is necessary for the provision of Services;
- h) Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller; and/or
- i) Processing is necessary for the purposes of the legitimate interests pursued by us or by a third party such as our financial payments, except where such interests are overridden by the fundamental rights and freedoms of the data subject, in particular where the data subject is a child.

3.6. If we receive Personal Data in the course of providing our Services to you from another data subject, we expect you to have complete responsibility for ensuring that the contents of this Privacy Policy are brought to their attention and you have obtained their consent in the process.

3.7. In some instances, it may be appropriate for us to combine your Personal Data with other information that we may be holding about you, such as combining your name with your geographic location or your browsing history.

#### **4. How we may collect and use your Personal Data**

- 4.1. We (or third party's data processors, agents and sub-contractors acting on our behalf) may collect, store and use your Personal Data by way of different methods to collect data from and about you including through:

Direct interactions. You may give us your Personal Data by corresponding with us by post, phone, email or otherwise. This includes Personal Data you provide when you:

- a) present Website content;
- b) browse our Website;
- c) use any of our Services;
- d) request marketing to be sent to you; or
- e) give us some feedback.

- 4.2. In addition to the above, we may use your Personal Data in the following ways and for the following purposes:

- a) To present Website content effectively;
- b) To provide information, and services that you request, or (with your consent) which we think may interest you;
- c) To provide, maintain and upgrade the Services;
- d) To operate, manage and upgrade the Website;
- e) To comply with a legal and/or regulatory obligation;
- f) To protect and safeguard our legitimate interests; or
- g) To fulfill other purposes as mentioned in this Privacy Policy, the Website and other policies.

- 4.3. We may keep a record of those links which are used the most to enable us to provide the most helpful information but we agree to keep such information confidential and you will not be identified from this information.

- 4.4. In addition, if you do not want us to use your Personal Data according to this Privacy Policy, you can let us know at any time by contacting us at [info@cloudlight.com.hk](mailto:info@cloudlight.com.hk), and we will delete your Personal Data from our

systems. However, you acknowledge this will limit our ability to provide the Services to you.

- 4.5. In some cases, the collection of Personal Data may be a statutory or contractual requirement, and we will be limited in the Services we can provide you if you do not provide your Personal Data in these cases.

## **5. Cookies**

- 5.1. We use cookies to distinguish users and improve our Website. Please look at our Cookies Policy for more cookies information.

## **6. Where we store your Personal Data and security**

- 6.1. Data security is of great importance to us, and to protect your Personal Data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure data collected through our Website.
- 6.2. We have put in place procedures to deal with any suspected Personal Data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.
- 6.3. By giving us your Personal Data, you agree to this arrangement. We will do what we reasonably can to keep your Personal Data secure.
- 6.4. We have implemented security measures such as a firewall to protect any data and maintain a high level of security.
- 6.5. Notwithstanding the security measures that we take, it is important to remember that the transmission of data via the internet may not be completely secure and that you are advised to take suitable precautions when transmitting to us data via the internet and you take the risk that any sending of that data turns out to be not secure despite our efforts.
- 6.6. We will keep Personal Data for as long as is necessary. We may however be required to retain Personal Data for a longer period of time to ensure we comply with our legislative and regulatory requirements. We review our data

retention obligations to ensure that we are not retaining data for longer than we are legally obliged to.

## **7. Disclosing your information**

7.1. We are entitled to disclose your Personal Data in the following cases:

- a) If we want to sell our business, or our company, we can disclose it to the potential buyer;
- b) We can disclose it to the related companies in our group;
- c) We can disclose it if we have a legal obligation to do so, or in order to protect the property, safety and/or rights of other person(s); or
- d) We can exchange information with others to protect against fraud or credit risks.

7.2. We may contract with third parties to supply Services to you on our behalf. These may include search engine facilities, advertising and marketing. In some cases, the third parties may require access to some or all of your Personal Data.

## **8. Your rights**

8.1. Please contact us at [info@cloudlight.com.hk](mailto:info@cloudlight.com.hk) if (a) you want to access your Personal Data; (b) you want to correct your Personal Data; or (c) if you have any other questions about our Website or this Privacy Policy.

## **9. Links to other sites**

9.1. Please note that this Privacy Policy, our Terms and Conditions and our other policies will not apply to other websites that you get to via a link from our Website. We have no control over how your Personal Data is collected, stored or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

## **10. Changes**

10.1. If we change our Privacy Policy, we will post the changes on this page.

## **11. Terms and Conditions**

11.1. Please also visit our Terms and Conditions section <https://www.cloudlight.com.hk/terms-and-conditions> establishing the use, disclaimers, and limitations of liability governing the use of our Website.

## **12. Your Consent**

12.1. By using our Website and by way of acknowledgement, you consent to our Privacy Policy.

## **13. Law and Jurisdiction**

13.1. The Privacy Policy is governed by and shall be construed in accordance with the laws of Hong Kong. If there is any dispute arising from this Privacy Policy, you agree to submit to the exclusive jurisdictions of the courts of Hong Kong.

13.2. Any person, firm, company or body who is not a party to this Privacy Policy has no right under the Contracts (Rights of Third Parties) Ordinance, Chapter 623 of the Laws of Hong Kong to enforce or to enjoy the benefit of any term of this Privacy Policy.

## **14. Miscellaneous**

14.1. If there is any inconsistency or conflict between the English and Chinese versions of this Privacy Policy, the English version shall prevail (unless otherwise indicated).