

PRIVACY POLICY

1. Pledge

Missions Points Network Company Limited (“MPNCL”, “we”, “us”, “our”) as the operator of the group loyalty program “K Dollar Program” (“KDP”) and its affiliated or related companies recognizes and understands that customers, website visitors, and mobile application users are concerned about the privacy of personal data. MPNCL pledges to comply with the requirements of the Personal Data (Privacy) Ordinance (Cap. 486) (the “PDPO”) of the Laws of Hong Kong Special Administrative Region.

This Privacy Policy Statement outlines MPNCL’s practices and the choices you have concerning the collection and use of your personal data. This Privacy Policy Statement should be read together with the applicable Terms and Conditions of the relevant service, website, and/or mobile application provided by MPNCL (the “Terms and Conditions”), provided that, in the event of any inconsistency between this Privacy Policy Statement and the Terms and Conditions concerning matters relating to personal data, this Privacy Policy Statement shall prevail. This Privacy Policy Statement should be also read together with the applicable personal information collection statement of the relevant service, website, and/or mobile application provided by MPNCL (the “PICS”), provided that, in the event of any inconsistency between this Privacy Policy Statement and the PICS concerning matters relating to personal data, PICS shall prevail.

2. Collection of Information

You may be invited to provide to MPNCL your personal data on MPNCL's relevant website(s) or mobile application(s), or through other media on a voluntary basis for different purposes at different times. If you are under the age of 18, you should obtain consent from your parent or legal guardian before you provide MPNCL with your personal data.

3. Log Files

When you visit MPNCL’s website(s) and/or use MPNCL’s mobile application(s), the servers of MPNCL will collect only data relating to your visits to/use of such website(s) and/or use MPNCL’s mobile application(s), including but not limited to your IP address, domain name, browser type and access time (“Log Files”). We may combine your Log Files with other personal data we collect from you, in which case such Log Files shall be

considered your personal data for the purposes of, and will be used in accordance with, this Privacy Policy Statement and the PICS.

4. Use of Cookies and other Tracking Mechanisms

When you browse the website(s) of MPNCL, cookies will be stored in your computers, mobile phones or other devices for internal navigation and programming only. We may use cookies and other tracking mechanisms described below to track information about your use of MPNCL's website(s) or mobile application(s) ("Tracking Data"). We may combine this Tracking Data with other personal data we collect from you, in which case such Tracking Data shall be considered your personal data for the purpose of, and will be used in accordance with, this Privacy Policy Statement and the PICS.

Cookies are alphanumeric identifiers that we transfer to your computers, mobile phones or other devices through your web browser for record-keeping purposes. Some cookies allow us to make it easier for you to navigate MPNCL's website(s) or mobile application(s), while others are used to enable a faster log-in process, or to allow us to store and track information about your interests and preferences at MPNCL's website(s) or mobile application(s).

We may also engage third parties to track and analyse non-personally identifiable data from the website(s) or mobile application(s). We use the data collected by such third parties to help us administer and improve the quality of MPNCL's website(s) or mobile application(s) and to analyse usage of the same. This is unrelated to and separate from your personal data. Such third parties may combine the non-personally identifiable data that we provide about you with other information that they have collected. You can edit your browser settings to disable cookies but to do so you may not be able to utilize certain functionality of the website(s) (and/or mobile application(s) where applicable) of MPNCL.

If you interact with MPNCL on social media platforms (for example if you "Like" MPNCL's Facebook page), MPNCL can interact with you and send you messages via these platforms. MPNCL will interact with you in accordance with the social media platform's rules but we are not responsible for how the platform operators collect and handle your personal data. We are not responsible for what third parties post on our social media accounts.

5. Kinds of Information Collected

For the different purposes in the course of conducting MPNCL's business, you may be required to provide to MPNCL your personal data, which may include your name, gender, age, date of birth, contact details, e-mail address, mailing/correspondence address, contact number, membership number, marital status, family status, educational level, occupation, username and password, Log Files, Tracking Data, social media account information, etc. Details of personal data to be collected will also be set out in the relevant PICS provided to you on or before collection of such personal data.

6. Purposes and Uses of Personal Data Collected

MPNCL will use your personal data for specific purposes identified in the PICS provided to you on or before your personal data is collected. This includes sharing your personal data with, and your personal data being used by, third parties as set out in our PICS for those purposes.

7. Accuracy of Information

You may be requested to provide to MPNCL certain personal data for specific services. If you fail to provide or update accurate information as requested for each specific service, the provision of such services by MPNCL may be affected.

8. Retention of Information

MPNCL will retain your personal data for a period no longer than necessary for the fulfillment of the purposes for which they are or are to be used. If you are a subscriber of MPNCL services, your personal data will be retained for a reasonable period after termination of your subscription for verification and audit purposes. The above is subject to any legal, statutory, regulatory or accounting requirements.

9. Third Party Merchants

MPNCL may have on-line stores or some services and/or products which are hosted on the website(s) of MPNCL but are operated by third party merchants. If you provide your personal data to the third party merchants in order to use, order or receive any services and/or products from the third party merchants, please note that your personal data is

beyond the control of MPNCL and thus is outside the scope of protection afforded by MPNCL.

10. Third Party Websites

The website(s) of MPNCL may from time to time contain linkages to other websites. These other websites are independent from the website(s) of MPNCL. MPNCL has no control or management over the contents of such other websites or their privacy policies or compliance with the law. You should be fully aware that the provisions of such links do not constitute an endorsement, approval, or any form of association by or with MPNCL. MPNCL has no control over your personal data submitted by you, if any, to other websites. This Privacy Policy Statement only applies to the website(s) of MPNCL. You should read the respective privacy policies of other websites.

11. Service Providers

MPNCL may provide your personal data to the people and companies providing services to MPNCL in connection with the specific purposes set out in the PICS and paragraph 6 above ("MPNCL Service Providers"). In these cases, the MPNCL Service Providers are required to use your personal data consistent with the agreements MPNCL enters into with them as well as this Privacy Policy Statement and the PICS.

12. Security of Information

The physical records of your personal data will be stored in secured places with restricted access by us or those who we share your personal data with in accordance with this Privacy Policy Statement and the PICS. The electronic records of your personal data will be stored in the servers of MPNCL located in secured places and protected by adequate IT security measures (e.g. encryption for transmission of sensitive data through the internet in appropriate cases), or we will procure by contract or use our reasonable endeavours to ensure that those who we share your personal data with in accordance with this Privacy Policy Statement and the PICS do the same. Only authorized personnel of MPNCL (who have been trained to handle your personal data properly and bound by a duty of confidentiality) will have access to these records and servers on a "need-to-know" and "need-to-use" basis, or we will procure by contract or use our reasonable endeavours to ensure that those who we share your personal data with in accordance with this Privacy Policy Statement and the PICS do the same.

Your personal data may be stored in physical locations and/or servers located within or

outside Hong Kong and/or shared with third parties with physical locations and/or servers located within or outside Hong Kong, in each case in accordance with our PICS. However, we will take all reasonable measures to ensure that your personal data is stored and processed securely, regardless of the place or country in which it is stored, and we will procure by contract or use our reasonable endeavours to ensure that any third parties will do the same.

No data transmission over the internet or any other public network can be guaranteed to be completely secure, and privacy cannot be assured in your communications to us. You are encouraged to protect against unauthorized access to your password. You are advised to sign out from your account when finished particularly when using a shared computer.

13. Exclusion

MPNCL may disclose your personal data as required by law, by any government departments, regulatory authorities, enforcement agencies and courts of competent jurisdiction. MPNCL excludes all liability for disclosure of your personal data in this manner.

14. Use in Legal Proceedings etc.

If it becomes necessary for MPNCL to take action against you for recovering from you the debt you owe to MPNCL, you agree that your personal data can be used by MPNCL in identifying and taking legal action against you.

15. Access and Correction of Information and Withdrawal of Consent

You have the right to request in writing to the Personal Data Privacy Officer of MPNCL to:

- a. check whether MPNCL holds any of your personal data;
- b. access your personal data held by MPNCL (if any);
- c. require MPNCL to correct your personal data that is inaccurate (if any); and
- d. ascertain our policies and practices (from time to time) in relation to personal data and the types of personal data held by us;
- e. withdraw your consent to the use of your personal data for direct marketing purposes (see below).

All such requests will be handled in accordance with the requirements of the PDPO. MPNCL may charge a reasonable fee for processing your data access request.

16. Direct Marketing

We cannot use or provide your personal data for direct marketing purposes without your consent. Subject to your consent, we may use or provide your personal data for direct marketing purposes in accordance with the PICS. You may withdraw your consent any time in by writing to the Personal Data Privacy Officer (Legal Department) of MPNCL at 30/F, New World Tower, 16-18 Queen's Road Central, Hong Kong.

17. Change of Privacy Policy

This Privacy Policy Statement may from time to time be updated, revised and changed. Any change, update, or modification will be effective immediately upon being posted on website(s) and/or mobile application(s) of MPNCL. Where legally required, we shall notify you and/or obtain your consent for specific material changes, updates, or modifications. If you do not accept the changes, updates, or modifications, and/or provide your consent, then we may not be able to provide goods or services to you. You are should check the website(s) and/or mobile application(s) of MPNCL for updates to this Privacy Policy Statement on a regular basis.

18. Change of Control

In the event of any actual or proposed transfer of business, transfer of shares, re-structuring, amalgamation, merger, sale, transfer, or purchase of us or our business or our affiliates or our affiliates' businesses, your personal data may be transferred to the new owner as part of the transaction. You will be notified of such transfer and you may decide to withdraw your consent to the use of your personal data.

19. Enquiries

If you have any questions or wish to access or correct your personal data or withdraw your consent to the use of your personal data held by MPNCL for direct marketing, please contact the Personal Data Privacy Officer of MPNCL at:

Missions Points Network Company Limited
30/F, New World Tower, 16-18 Queen's Road Central, Hong Kong

Attention: Personal Data Privacy Officer (Legal Department)
(Marked Confidential)

20. English Version

If there is any inconsistency or conflict between the English and Chinese version of this Privacy Policy Statement, the English version shall prevail.

PRC Addendum

If you are:

- (i) an individual located in Mainland China who visits or uses the Application or visits the Website of MPNCL, or otherwise uses MPNCL's products and/or services including but not limited to the KDP managed and operated by MPNCL and/or any other loyalty program managed and operated by other entities through which the relevant loyalty points can be converted to points under the KDP, by phone or any other means from Mainland China; and/or
- (ii) an individual holding a Mainland China passport and/or resident identity card who visits the premises, including but not limited to malls, shops, and/or buildings where "K Dollar" under the KDP can be earned and/or used in Hong Kong or otherwise uses MPNCL's products and/or services by phone or any other means in Hong Kong,

your personal data will be processed by MPNCL in accordance with the "People's Republic of China Addendum" in addition to the MPNCL Privacy Policy Statement, as well as the applicable data protection laws and regulations in Mainland China which, for the current purposes, excludes Hong Kong, the Macau Special Administrative Region of the People's Republic of China and Taiwan.

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