



## **Privacy Policy**

### Privacy Policy

Venchi Hong Kong Limited cares about protecting and respecting your privacy. In order to serve you better and provide you with the best customer experience, we need to collect some personal data about you. This Privacy Policy will help you understand how we collect and use your personal data, who we share your personal data with, and how you can control the way your personal data is collected and used by us.

Venchi Hong Kong Limited respects the privacy rights of users to the Company's mobile app and of individuals who participate in, access or sign up to any of the Company's services, activities or online content including without limitation our business partners' products and services (collectively referred to as "Services"). We endeavor to ensure that all our collection, transmission, storage and usage of personal data is carried out in compliance with the Personal Data (Privacy) Ordinance, Cap 486 of the laws of the Hong Kong Special Administrative Region (the "PDPO"). By providing your personal data to us, you are consenting to this Privacy Policy.

If you access or use our mobile app or register to join as a member of our Venchi membership ("Membership"), then this Privacy Policy is deemed to be agreed by you and will apply to you. If you do not agree with this Privacy Policy, please stop using our mobile app, and do not apply for a Membership.

Sometimes, we may send you a new notice to explain how we may use your personal data in specific situations, and will always give you the choice to opt out of such uses.

Are you over 18?



Our mobile app and Membership are only intended for people over the age of 18. However, if you are under the age of 18, you may only use our mobile app or apply for a Membership if this has been authorised by your parent or legal guardian and you have obtained their consent to use our mobile app, or become a Venchi Member, on the basis of this Privacy Policy and the General Terms and Conditions

If Venchi discovers member did not obtain the necessary content to us the App, Venchi reserves the right to suspend, vary or discontinue any promotion offers and services at anytime without further notice. In case of dispute, the decision of the Venchi shall be final.

#### What information we collect

The mobile app requires Users to register or provide Personal Information to us in order to view our Services. Venchi collects Personally Identifiable Information which is information that can be used to identify you as an individual or allow someone to contact you, as well as information attributed with such information.

If you choose to register as a Member of the Services, we collect the following information about you: first name, given name, phone number, date of birth, gender, email address, password, your membership number, Account status and activities relating to your Account and point balance; information about the Rewards you redeem. In addition, if you wish earn points for redemption, you may be further requested to provide postal mail, preference of shops, your shopping preferences and types of products you may be interested. We use the information you supply for the purpose of providing the services you have requested, and as described in this Policy.

#### When you visit our mobile app



We may use log files to automatically collect information about:

your personal information such as first name, given name, phone number, date of birth, gender, email address, password, postal mail, preference of shops and point balance

your preference such as the rewards you have redeemed and the quantity of the redemption; product that you like

your visits to our mobile app, such as your browsing history, how long you stay on our mobile app, and how often you visit;

The purpose of the information is for analyzing trends, administering the site, tracking users' movement on the mobile app, and gathering demographic information.

How do we use your information?

We will only use your personal data for the purposes set out below.

(a) Account administration

To help administer and maintain your Account, including:

creating and updating your Account;

verifying your identity;

creating a single profile about you, including combining your information with any other personal data already held by us;

processing Points issuance and Reward redemptions;



sending you updates about new features and benefits relating to Membership; and

(b) Customer support

To assist you when you contact us, such as responding to and investigating any of your questions or concerns, and monitoring and improving our customer support services.

(c) Marketing

To provide you with marketing and promotional materials ("Marketing Communications") if you choose to receive them. Please see the section on Direct Marketing below for more information.

(d) Personalisation

To create personalised Marketing Communications tailored to your interests and preferences, and to provide you with the best possible customer experience in relation to our Site, App and your Membership. We may also use data analytics tools to determine whether our offers, advertisements and promotions are effective, as well as to determine whether you may be interested in new products or services, or to customise the content and types of offers, products, services and Rewards that we present to you.

(e) Optimisation and improvements

We may use your personal data to understand and improve our mobile app or Membership operations through various means, such as the use of analytics tools, research, surveys and feedback forms. This will enable us to enhance services or products, develop new



features and benefits, and amend business, marketing and strategic operations and plans.

(f) Legal and administration purposes

We may use your personal data to investigate or handle any incidents, claims or disputes, or as otherwise required by law or requested by any law enforcement or regulatory authorities, courts or other governmental agencies. We may also use your personal data in relation to any legal proceedings concerning you.

Sent to information sharing / third party advertising

We work with our affiliates and other third parties who provide services including but not limited to Services operation, payment processing and authorization, data analysis, order fulfillment, client support, list enhancement and other administrative services. By becoming a Member, you give us consent to share your Personal Information with such third parties providers are located in foreign jurisdictions. We may share Personal Information with such third parties for the purpose of enabling these third parties to provide services to us. Such service providers may include client support specialists, webhosting companies, client data management and enhancement companies, payment processors, fulfillment companies (e.g., companies that fill product orders or coordinate mailings), data analysis firms and email service providers. Such third parties may be provided with access to Personal Information needed to perform their functions, but may not use such information for any other purpose. Except to the extent you have already opted out, we may transfer your Personal Information, to our affiliates for the purpose of enabling them to send promotional materials to you and conduct direct marketing activities in relation to their products and services.

By using our mobile app, or applying to become a Member, you also give us consent to





allow us to share your Personal Information, including your first name, given name, address, date of birth, gender, email address, as well as a record of any transactions you conduct on our Services or offline with us with a third-party advertising partner and its service providers in order to deliver to you banner advertisements and other advertising tailored to your interests when you visit other websites or app.

Our advertising partner will make the data we provide to it anonymous. Since Venchi does not control these third party cookies, please check the privacy policy of the Internet advertising company or advertiser to see whether and how it uses cookies. Note that if you delete your cookies or buy a new mobile, you will need to renew your opt-out choice.

We may also disclose certain Personal Information when we believe in good faith that disclosure is necessary to protect our rights or property, protect your safety or the safety of others, investigate fraud or respond to a government, judicial or other legal request, or to comply with the law.

### Third party sites

The Services may contain links to third-party websites. These linked sites are not under Venchi's control and we are not responsible for the privacy practices or the contents of any such linked site, or any link contained in any linked site. We provide such links only as a convenience, and the inclusion of a link on the Services does not imply endorsement of the linked site by Venchi. If you provide any Personal Information through any such third-party website, your transaction will occur on the third party's website (not the Site) and the Personal Information you provide will be collected by, and controlled by, the privacy policy of that third party. We recommend that you familiarize yourself with the privacy policies and practices of any third parties.



PLEASE NOTE THAT THIS POLICY DOES NOT ADDRESS THE PRIVACY OR INFORMATION PRACTICES OF ANY THIRD PARTIES.

#### Sweepstakes / promotions

The mobile app sometimes includes notices of sweepstakes or other promotions we are conducting, and we may permit you to enter electronically in some cases. If that occurs, we will use the information you provide for the purpose of conducting the promotion (e.g., to contact you if you are a winner in connection with a promotion). In addition, we may participate in internet related promotions sponsored by third parties. In these instances, if you are a participant in such promotions, we may provide certain Personal Information to these third parties in furtherance of the promotion. These parties have agreed to hold this information in confidence, not use it for any purpose except to carry out the requested service, and to honor our privacy and security policies in the way this information is handled.

#### Market Research

From time to time, the mobile app may also conduct questionnaires and surveys and we may contact you via email, postal mail, or phone. Survey information is treated like all of the information we collect, and it is used to help us improve the appeal of our products and our Services.

#### Direct Marketing

From time to time, the Company may use your personal data to send you news, offers, promotions and joint marketing offers and the Company requires your consent for that



purpose. We may contact you by email, in-app notifications, social media, WhatsApp, SMS, text/picture/video message, telephone or postal mail.

Your name, email address, telephone number, contact address, date of birth, gender, products and services portfolio information, transaction patterns and behaviors, browsing records, content viewing habits and personal interests held by the Venchi may be used by Venchi in direct marketing of the Services.

If you prefer not to receive any direct marketing communications from us, you can opt out at any time by updating your preferences through an unsubscribe link provided in the email or e-mail us at [hk.customerservice@venchi.com](mailto:hk.customerservice@venchi.com). Upon receipt of your request, we shall cease to so use your personal data as soon as possible without charge to you.

#### 10. Updating, Deleting editing your member information

A Member can access, review all of their personally identifiable information (except name and phone number) that was provided to us online by visiting the following Venchi's mobile app. If a member wish to update anything (except name and phone number) about their profile, please send out your request to [hk.customerservice@venchi.com](mailto:hk.customerservice@venchi.com) If a Member wishes to have their account deleted, the Member can either click on the "Terminate" button in the app's setting or send an email requesting the deletion to [hk.customerservice@venchi.com](mailto:hk.customerservice@venchi.com). Upon member cancellation on Venchi Membership Account will be immediately terminated, and all accumulated Points and any Rewards that member have not collected will be forfeited. We will keep your personal data only for so long as is necessary to fulfill the purposes outlined in this Privacy Policy, unless the law requires us to keep it for a longer period. Once we no longer need your personal data, we will either irreversibly anonymise or securely delete it on our servers.





## Jurisdiction

The Services are controlled and operated by Venchi from Hong Kong, does not intend to collect Personal Information from residents of any country or jurisdiction other than Hong Kong, and is not intended to subject Venchi to the laws or jurisdiction of any other state, country or territory. Venchi does not represent or warrant that the Services, or any part thereof, is appropriate or available for use in any particular jurisdiction. Those who choose to access the Services, do so on their own initiative and at their own risk, and are responsible for complying with all local laws, rules and regulations. We may limit Service availability, in whole or in part, to any person, geographic area or jurisdiction we choose, at any time and in our sole discretion.

## Security

The security and confidentiality of your information is extremely important to us. We take all reasonable steps, including the implementation of technical and physical security measures, to ensure that all your personal data held by us is kept secure and safe from any loss or unauthorised disclosure, use and modification. All transactions under the terms and conditions of this Privacy Policy are based on the encryption of data exchanged between you and us on our secure App. Unfortunately, no data transmission over the Internet or data storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of your account has been compromised), please notify us of the problem as soon as possible by contacting us in accordance with Section 18 ("Contacting Us") below (note that if you choose to notify us via physical mail, this will delay the time it takes for us to respond to the problem). To safeguard your privacy, we need your help. When registering an account on the Services, please be sure to choose an account password that is difficult for others to guess, preferably a password you do not use on any other website or account, and never reveal it to anyone else. From time to time, we review our security procedures in order to consider appropriate new technology and methods. Please be aware that despite



our best efforts, no security measures are perfect or impenetrable.

#### List of Potential Transferees of Personal Data

Parties to whom personal data collected by us may be transferred:

Governments, law enforcement authorities, courts and tribunals.

Legal and other professional advisors, insurers, loss adjustors, rehabilitation service providers.

Any third party whom you have authorized to obtain your personal information from Venchi Hong Kong Limited

#### Opting Out

If you have an account and you would like to stop receiving marketing emails from us, please opt out by sending us email at [hk.customerservice@venchi.com](mailto:hk.customerservice@venchi.com) or calling us on +852 2330 3196.

Additionally, gift recipients may, from time to time, receive our latest catalog as well as offers from us regarding new products and services that we think may be of interest to them. We allow gift recipients the option to opt out of receiving future marketing related communications from us. If gift recipients would rather not receive marketing emails from us, please let us know by emailing customer service at [hk.customerservice@venchi.com](mailto:hk.customerservice@venchi.com) or calling us on +852 2330 3196.

We will endeavor to comply with your request as soon as reasonably practicable and in accordance with applicable law. Please note that if you opt-out as described above, we



will not be able to remove Personal Information about you from the databases of third parties with which we have already shared Personal Information as of the date that we implement your opt-out request. If you wish to cease receiving marketing-related e-mails from third parties, please contact such third parties directly or utilize any opt-out mechanisms set forth in their respective privacy policies or marketing-related e-mails. If you would rather not receive mailings from our third parties, please also email us at [hk.customerservice@venchi.com](mailto:hk.customerservice@venchi.com) or calling us on +852 2330 3196.

How long do we keep your data for

We will keep your personal data only for so long as is necessary to fulfill the purposes outlined in this Privacy Policy, unless the law requires us to keep it for a longer period. Once we no longer need your personal data, we will either irreversibly anonymise or securely delete it on our servers.

## 16. Changes to this Policy

We may change this Policy from time to time. When we do, we will let you know by posting the changed Policy on this page with a new “Effective Date.” In some cases (for example, if we significantly expand our use or sharing of your Personal Information), we may also tell you about changes by additional means, such as by sending an e-mail to the e-mail address we have on file for you. In some cases, we may request your consent to the changes.

## Contacting Us

If you have any questions about our Policy, you can e-mail us at



hk.customerservice@venchi.com or calling us on +852 2330 3196 We will be happy to answer your questions or address your concerns.

Please note that e-mail communications will not necessarily be secure. Accordingly, you should not include credit card information or other sensitive information in your e-mail correspondence with us.

In the event of any discrepancy or inconsistency between the English and Chinese versions of this Privacy Policy, the English version shall prevail.

Effective Date: 31 August, 2021