

Privacy Policy Statement

Read Immediately: This policy statement provides information on the obligations and policies of Prorsum Group Holdings Limited ("PGHL") under the Hong Kong SAR Personal Data (Privacy) Ordinance 1995 - Cap. 486 (the "Ordinance"). PGHL and our staff will fully comply with the obligations and requirements of the Ordinance.

All collection and/or storage and/or transmission and/or usage of personal data by PGHL shall be done in accordance with the obligations and requirements of the Ordinance. Where an individual legitimately requests access to and/or correction of personal data relating to the individual, held by PGHL, then PGHL shall provide and/or correct that data in accordance with the times and manner stipulated within the Ordinance.

Your entering and usage of this website and the services we provided are governed by our Policy Statement. You are strongly advised to read this whole Policy Statement immediately. If you do not agree with the Policy Statement and other terms & conditions stated in this website, please exit this website. By progressing beyond this screen and other pages of this website, you are deemed to agree with our Policy Statement and other terms & conditions stated in this website.

Statement of Practices

For the purpose of registration and administration of PGHL services (including relevant online services), you may require to provide personal data information such as company name, personal name, address and telephone number, etc., in order for PGHL to provide or to proceed on the requested services.

In some instances, you may also require to provide certain data that may be used to better tailor the type of information presented to you. In most cases, this type of data is optional although, where the requested service is a highly personalized service, failure to provide the requested data may prevent us from providing the service.

In support of our services, information may be automatically collected relating to those services so we may perform accurate reporting and administration of your accounts such as call time, duration, origin, and destination.

PGHL's web servers may also collect data relating to your online session, the use of

which is to provide aggregated, anonymous, statistical information on the server's usage so that we may better meet the demands and expectations of visitors to our sites. This type of data includes: the browser type and version; operating system; or the IP address and/or domain name. Certain websites may place a "cookie" on your machine in order to provide personalized services and/or maintain your identity across multiple pages within a single session.

Apart from the above, PGHL will not use the information for other purposes or disclose it to outside individual, bodies or company. When direct marketing activities are conducted, you are entitled to opt-out from receiving the relevant marketing material.

Retention and Disclosure of Personal Data

PGHL will destroy any personal data it may hold in accordance with our internal retention policy as below:

- a. personal data will only be retained for as long as is necessary to fulfill the original or directly related purpose for which it was collected; unless
- b. the personal data is retained to satisfy any applicable statutory or contractual obligations.

Personal data may also be disclosed to any person or persons that have a right under the Ordinance to gain access to such information provided they are able to prove their authority to access such information. For example, if PGHL were served with a court order demanding certain customer information then PGHL would disclose the information to the duly appointed officer of the court.

Security

Access to records and data would be strictly limited to authorized staff. Authorizations are granted only on a "need to know" basis that is commensurate with an individual's responsibilities and training.

The records of PGHL are under the control of assigned information officers who are responsible to ensure the transfer of or access to information is legitimate and

complies with the Ordinance.

Enquiries

For any enquiries and request for personal information being collected, please write to us at:

Prorsum Group Holdings Limited

Unit 1005, 10/F, Nanyang Plaza, No. 57, Hung To Road, Kwun Tong, Kowloon, Hong Kong

Attention: Privacy Compliance Officer

Email: PGHL@ProrsumGroup.com

(In case if there are any inconsistencies or different interpretations between the English and the Chinese version, the English version would be the final version for judgment)