

## **Privacy Policy**

You can find contact information for our company at the end of this document. Please use it if you are unsure about any of the items contained herein, we will be more than happy to help resolve your query.

### **1. Information Collection and Use**

#### **1.1 Information Collection**

Able Communications Group (ACG) is the sole owner of the information collected for using the Services from our users at several different points on our Website.

#### **1.2 Registration**

In order to use areas of this Website, a user must first complete a registration form. During registration a user is required to give contact information (such as name and email address). We use this information to create an account for the user for the service in which the user has expressed interest. To use certain services, mainly for the ones where the user is required to transfer funds to ACG and affiliated companies, registration of personal information for accounts and records purposes and for contacting you in case of a problem may be required.

#### **1.3 Order/Payment**

We request information from the user on our order/payment forms. A user must provide contact information (such as name, email, and home address) and financial information (such as credit card number, expiration date). This information is used for billing purposes. If we have trouble processing an order, the information is used to contact the user. You will be notified if you are agreeing to make a regular payment before you proceed with it – to terminate a regular payment or dispute a payment email or write to Billing Department, Able Communications Group, 23/F, Causeway Bay Plaza 1, 489 Hennessy Road, Hong Kong. You will be billed by the Services or the appropriate third party – you will be notified of who will take the payment when it is made.

#### **1.4 Information Use**

You consent to us transferring or disclosing your personal data to:

- (a) our related companies, agents and subcontractors or other parties, either within Hong Kong or overseas for the purposes of conducting direct marketing to you and other purposes as determined by us from time to time, subject to our complying with our obligations under the Privacy Ordinance;
- (b) any person who is under a duty of confidentiality to us who has undertaken to keep such information confidential;
- (c) any financial institutions, charge or credit card issuing companies, credit information, credit reference, or collection agencies necessary to:

- (i) establish, support and recover the payments you are required to make to us in consideration of us providing the Services to you; or
- (ii) to detect and prevent any alleged fraudulent or illegal activity;
- (d) any financial institutions, banks, credit rating agencies or like organizations for the purpose of our financing of our business;
- (e) the Telecommunications Authority or other bodies where such transfer and/ or disclosure is required by law for the discharge of any obligations under the provisions in the Telecommunications Ordinance (Cap.106) or other applicable law, rules or regulations; and
- (f) any carrier or other service provider whose facilities we use to provide the Services to you.

The Privacy Ordinance provides you with rights to ascertain whether we hold your personal data, to obtain a copy of that data and to correct any inaccuracies in that data. In accordance with the Privacy Ordinance, we may charge a reasonable fee for processing of any data access request. All requests relating to ascertaining whether we hold your personal data, access to that data, correction of that data or for information regarding our personal data protection policies and practices should be addressed to us marked to the attention of the Privacy Compliance Officer. If you do not want us to use your personal data for the purpose of direct marketing to you or to supply your personal data to any other person, you must notify us in writing addressed to the attention of the Privacy Compliance Officer.

## 2. Profile

ACG uses cookies and some other devices during your usage of the sites. We do not create a profile of individual users and visitors and does not target users depending on their usage of the site to protect their privacy. Third party advertisers, however, may create a profile of a user to determine what adverts are served to ACG users and where.

## 3. Cookies

A cookie is a piece of data stored on the user's computer tied to information about the user. We use session ID cookies. For the session ID cookie, once users close the browser, the cookie simply terminates. By setting a cookie on our site, users would not have to log in a password more than once, thereby saving time while on our site. Your password is not stored in a cookie; instead the cookie stores the session ID. This is for your own security and privacy, and if users reject the cookie, the user will be limited in some areas of our site. Some of our business partners use cookies on our site (for example, advertisers). However, we have no access to or control over these cookies, once we have given permission for them to set cookies for advertising. The information stored by our advertisers is in no way linked to your personal

information, which is kept completely private and secure at all times.

#### **4. Third Party Advertising**

The ads appearing on this Website are delivered to users by several globally recognized companies, our Web advertising partners. Information about a users' visit to this site, such as number of times they have viewed an ad (but not user name, address, or other personal information), is used to serve ads to users on this site. You can email, or write to Advertising Department, Able Communications Group, 23/F, Causeway Bay Plaza 1, 489 Hennessy Road, Hong Kong, for more information.

This privacy statement covers the use of cookies by ACG platform only and does not cover the use of cookies by any advertisers.

#### **5. Log Files**

Like most standard website servers we use log files. This includes internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, platform type, date/time stamp, and number of clicks to analyze trends, administer the site, track user's movement in the aggregate, and gather broad demographic information for aggregate use. IP addresses, etc. are not linked to personally identifiable information. Log files are kept for your security, not to infringe your privacy.

#### **6. Clear Gifs (Web Beacons/Web Bugs)**

ACG does not employ "Clear Gifs" to collect information about individual users. Our advertisers may do at any time, but the information will not be linked in any way to personal details stored by ACG.

#### **7. Communications from the Site**

##### **7.1 Special Offers and Updates**

We may send new members welcome information (depending on the service, sometimes giving account information, general information, or payment details). Established members will occasionally receive information deemed necessary by ACG for their use of the services.

##### **7.2 Newsletter**

Optional newsletter services may be provided and withdrawn by ACG at any time. Each communication we send you will contain instructions permitting you to "optout" of receiving future communications.

##### **7.3 Service Announcements**

On rare occasions it is necessary to send out a strictly service related announcement. For instance, if our service is temporarily suspended for maintenance we might send users an email. These messages are not promotional and are always essential to the users' use of ACG products and services. Receiving these messages is part of the ACG service.

#### **7.4 Customer Service**

We communicate with users on a regular basis to provide requested services and in regards to issues relating to their account we reply via email, mail, or phone, in accordance with the users' wishes. You may be contacted by our Customer Service staff for a period of time after your enquiry to ensure the matter was resolved, or to notify you of developments.

Our Customer Support staff do not have access to critically private information such as your password or PIN number for a specified service. At all stages of the business, user privacy is extremely important, and user information remains protected at all times.

#### **8. Legal Disclaimer**

Though we make every effort to preserve user privacy, we may need to disclose personal information when required by law wherein we have a good-faith belief that such action is necessary to comply with a current judicial proceeding, a court order or legal process served on our Website. We will make every effort to help the Police services with their enquiries if we believe it is in our users' interests and to protect the ACG service.

#### **9. Aggregate Information (non-personally identifiable)**

We do not share aggregated demographic information with our partners or advertisers unless deemed specifically necessary. Any information ACG does store or share is not personally identifiable and ACG believes there is no infringement of user privacy.

#### **10. Third Party Advertisers**

Advertisers may collect information while you are using ACG site about pages you have viewed, and other viewing details. This helps them provide you with different and interesting adverts on every page you see. ACG does not share additional information with advertisers.

These are the instances in which we will share users' personal information:

Legal requirements and circumstances

When permission/authorization has been obtained from a user

#### **11. Third Party Intermediaries**

We use a credit card processing company to bill users for goods and services. We may also need to use other companies to deal with your requests or provide certain services. Other companies on our behalf will provide some services. These companies do not retain share, store or use personally identifiable information for any secondary purposes.

#### **12. Service Providers**

Third parties, who are providing a product or service on our behalf to the user, are

not allowed to use personally identifiable information except for the purpose of providing these services. Secondary usage is strictly forbidden.

#### **13. Links**

This Website contains links to other sites. Please be aware that we, ACG, are not responsible for the privacy practices of such other sites. We encourage our users to be aware when they leave our site and to read the privacy statements of each and every Website that collects personally identifiable information. This privacy statement applies solely to information collected by these Websites (ACG).

#### **14. Surveys & Competitions**

From time-to-time our site requests information from users via surveys or competitions. Participation in these surveys or contests is completely voluntary and the user therefore has a choice of whether or not to disclose this information. The requested information typically includes contact information (such as name and shipping address), and demographic information. Contact information will be used/shared with the competition/survey to notify the winners, and award prizes, or analyse data. Survey information will be used for purposes of monitoring or improving the use and satisfaction of this site, as well as by our advertisers. Users' personally identifiable information is not shared with third parties unless we give prior notice and choice, or the survey or competition is entered through an advert provided by a third party advertising company. Though we may use an intermediary to conduct these surveys or contests, they may not use users' personally identifiable information for any secondary purposes.

#### **15. Security**

ACG takes every precaution to protect our users' information. When users submit sensitive information via the Website, their information is protected both online and off-line.

#### **16. Credit Check**

ACG reserves the right to perform credit referencing and other checks before offering credit facilities to customers where available. Checks will be made by our authorised third party to authorise transactions on major credit and debit cards if you are making purchases through ACG. They will obtain "available credit" information from your card issuer and may validate other details for security reasons.

#### **17. Purchasing History**

ACG reserves the right to keep details of other transactions, or services you have used, when dealing with us. They will not be disclosed to third parties, and used only for accounts and records purposes.

#### **18. Enhancement of Marketing Profile**

All our advertising is handled by the named advertising companies, other advertising

companies, or companies acting on their behalf. ACG does not purchase third party information to assist advertising.

#### **19. Correcting/Updating/Deleting/Deactivating Personal Information**

ACG requires you to keep your information accurate and correct. If at any time you wish to see the information held about you by ACG, as specified by the Data Protection Act 1998, you need to contact us and request your account details. A charge deemed by ACG as “reasonable” will need to be paid before we release the information to cover our administration costs. If any information held about you by ACG is inaccurate then you are responsible for ensuring it is corrected. You must also ensure the information given to us is accurate and correct at all times. We will amend any information found to be incorrect but any information provided directly by you (i.e. name and address) is your responsibility to maintain. ACG reserves the right to retain your personal information for as long as is necessary after you request your account closed. However, you will no longer be bound by the terms and conditions of a service once an ACG representative has confirmed the account closed. You must no longer use this account. We are GDPR ready. If you are using our service to process personal information of people in the European Union countries, you should execute the GDPR-ready data protection addendum at your sure to sure that you are taking measures to comply with the standards as set out under the European Union’s GDPR.

#### **20. Notification of Changes**

If we decide to change our privacy policy, we will post those changes to this privacy statement, the homepage, and other places we deem appropriate so our users are always aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. We will use information in accordance with the privacy policy under which the information was collected. If, however, we are going to use users’ personally identifiable information in a manner different from that stated at the time of collection we will notify users via email. Users will have a choice as to whether or not we use their information in this different manner. However, if users have opted out of all communication with the site, or deleted/deactivated their account, then they will not be contacted, nor will their personal information be used in this new manner. In addition, if we make any material changes in our privacy practices that do not affect user information already stored in our database, we will post a prominent notice on our Website notifying users of the change. In some cases where we post a notice we will also email users, who have opted to receive communications from us, notifying them of the changes in our privacy practices.

#### **21. Contact Information**

If users have any questions or suggestions regarding our privacy policy, please

contact us at:

Able Communications Group, 23/F , Causeway Bay Plaza 1, 489 Hennessy Road, Hong Kong

<http://www.acg-hk.com>

Your query will be dealt with quickly. If sending a letter please include a return address, contact telephone number, and username/ email address.

Thank you.

In case of any conflict between English and Chinese versions of discrepancy, the English version shall prevail.

我同意上述個人資料將用作 Able Communications Group 及其隶属、联营、相关、附属公司作日后的传讯或推广用途。資料会作保密处理。