

## CTHKA Privacy Policy

Effective Date: **September 30<sup>th</sup> 2017**

This Privacy Policy which details important information regarding the use and disclosure of user information collected on the website <https://cthka.net> and any successor websites, (collectively the “Site”), and other interactive properties, including but not limited to any mobile applications enabling you to access the Site (the Site and other CTHKA interactive properties are collectively referred to herein as the “CTHKA Applications”). CTHKA provides this Privacy Policy to help you make an informed decision about whether to use, or continue to use, the products and services provided by CTHKA and/or accessed through the CTHKA Applications or offline ("Product(s)" and "Service(s)"). This Privacy Policy applies to your use of (1) the CTHKA Applications (however accessed and/or used, whether via personal computers, mobile devices or otherwise); (2) our Products and Services; (3) email or electronic catalogs and newsletters; (4) offline means such as direct mail, telephone and postal mail; (5) any third party engaged in online payments system, gateways, with which CTHKA signed an agreement, and (6) any other means or applications in which you connect with CTHKA.

By accessing, using, registering with, or providing personal information to CTHKA, you explicitly accept, without limitation or qualification, (i) the collection, use, storage and transfer (including international transfer) of user information in the manner described in this Privacy Policy (as amended from time to time) and (ii) the CTHKA Terms of Use hereby incorporated by reference. **THIS PRIVACY POLICY AFFECTS YOUR RIGHTS AND LIABILITIES UNDER THE LAW.** If you do not agree to the terms of this Privacy Policy, do not access or use the CTHKA Applications or provide us with personal information.

We may collect different types of information, including, but not limited to, personal information, financial information, demographic information, log, Device (hereinafter defined) and aggregate data. Sometimes we collect combinations of all these types of information. In each case, when using the CTHKA Applications, it is indicated on the CTHKA Applications whether any personal or demographic data must be provided for you to access and use the CTHKA Applications and/or purchase the requested Product or Service.

### **Connecting With The CTHKA Applications And Information Provided By You**

When you provide us with information in connection with a particular activity or otherwise sign up for or order our Products and Services or provide your contact information, including an email address or telephone number in connection with that activity, product or service, you agree that this action constitutes a purchase or inquiry establishing a business relationship with us. You expressly consent to our communicating with you about CTHKA using the information you provided to us. You also attest that you have the legal authority over any telephone number you provide to us and can provide us with the authorization to contact you. This means we may contact you, in person or by recorded message, by e-mail, telephone and/or mobile telephone number (including use of automated dialing equipment), text (SMS) message, or any other means of communication that your wireless or other telecommunications device may be capable of receiving.

**Registration Information.** We will collect personal information from you if you register with the CTHKA Applications or place an order for our Products or Services, which may include, but is not limited to, name, address, phone number(s), email address(es), personal interest preferences, and any other information about you we consider relevant ("Personal Information"). You may not use a user/account name that is vulgar or otherwise offensive (as determined by CTHKA), infringes any trademark or other proprietary rights of others, or is used in any way that violates the Terms of Use. CTHKA reserves the right to deny, in its sole discretion, any user access to the CTHKA Applications and/or our Products

and Services without notice for any or no reason.

**Financial Information.** Financial information is information that you provide to us, including your debit or credit card number and related billing information (collectively, the “Billing Information”). We require such financial information in order to process payment for the purchase of a Product or Service that you have requested. By submitting your financial information, you consent to our providing it to those Authorized Third Party Service Providers (as later defined) as necessary to support and process your transactions as well as your credit card issuer/banking institution for their purposes.

**We ask that you do not enter financial information into your profile, except in the fields provided for that information.**

**Facebook.** You may be given the option to link your Facebook account so that you can comment on the CTHKA Applications and/or our Products and Services or take advantage of other features of the CTHKA Applications. When you comment on the CTHKA Applications using your Facebook username and password and clicking "allow" on the Facebook permission authorization screen, we will automatically import whatever information that you allow to be imported from your Facebook profile based upon your privacy settings at Facebook, such as your location, your interests, etc. (collectively, "Permitted Facebook Profile Content") and you give us permission to capture, store, use and display your Permitted Facebook Profile Content, including syncing access to such Permitted Facebook Profile Content when you are not using CTHKA Applications and we may share that information with other users. The authentication of your Facebook login credentials are conducted solely through Facebook.

**User Generated Content.** The CTHKA Applications may contain review or chat areas and/or other message, communication or other mechanisms designed to enable you to communicate with others or to post content on the CTHKA Applications (the “Communication Services”). Please remember that any information you disclose while participating with the Communication Services becomes public information, becomes the property of, and is subject to redistribution by, CTHKA. You should exercise caution and discretion when deciding to disclose your personal information in a submission or posting. There is no expectation of privacy when posting or otherwise participating on the Communication Services. If you post content, such as messages, reviews or photos, please be aware that any personally identifiable information contained in such content is accessible to registered users or visitors to that CTHKA Application or Communication Services and we have no control over how those users may use your personally identifiable information. We have the right, but not the obligation, to monitor any activity and content associated with the Communication Services. We reserve the right to take action in connection with any content we deem to be inappropriate. Please review our Terms of Use for more information regarding your appropriate use of these Communication Services.

### **Information Collected Through Technology**

In addition to any Personal Information or other information that you choose to submit to us, we and our third-party service providers may use a variety of technologies such as cookies, pixel tags and web beacons, browser analysis tools, and web server logs. As you use our CTHKA Applications, your browser and devices communicate with servers operated by us, our business partners and our Product and Service providers to coordinate and record the activity and fill your requests for our Products and Services and information ("Usage Information"). We collect many different types of information from cookies and other technologies. For example, we may collect information from the devices you use to access our CTHKA Applications, your operating system type or mobile device model, browser type, domain, and other system settings, as well as the language your system uses and the country and time zone of your device. Browsers routinely send these types of information to web servers. In addition, we collect your IP address or other unique identifier (“Device Identifier”) for your computer or other device used to access the CTHKA Applications (any, a “Device”). A Device Identifier is a number that is automatically assigned to the Device used to access the CTHKA Applications, and our computers identify your Device by its Device Identifier. We may also collect information about the website you were

visiting before you came to our CTHKA Applications and the website you visit after you leave our CTHKA Applications, if this information is supplied to us by your browser. We may use this Usage Information for a variety of purposes, including to enhance or otherwise to improve the CTHKA Applications.

The information from cookies and related technology is stored in web server logs and also in web cookies kept on your Device(s), which are then transmitted back to our Site by your Device(s). These servers are operated and the cookies managed by us, our business partners or our service providers. For example, when you visit CTHKA Applications, we and our service providers may place cookies on your Device(s). Cookies allow us to recognize you when you return, and may track and target your interests in order to provide a customized experience. They also help us detect certain kinds of fraud. A "cookie" is a small amount of information that a web server sends to your browser that stores information about your account, your preferences, and your use of the CTHKA Applications. Some cookies contain serial numbers that allow us to connect your activity with CTHKA Applications with other information we store about you in your profile or as related to your interactions with CTHKA Applications.

Some cookies are temporary, whereas others may be configured to last longer. "Session" cookies are temporary cookies used for various reasons, such as to manage page views. Your browser usually erases Session cookies once you exit your browser. "Persistent" cookies are more permanent cookies that are stored on your computers or mobile devices even beyond when you exit your browser. We use Persistent cookies for a number of purposes, such as retrieving certain information you have previously provided. "Flash" cookies, known as local shared objects, are data files placed on a Device via the Adobe Flash plug-in that may be built-in to or downloaded by you to your Device to personalize your visit. Our third-party service providers also may use Flash cookies to collect and store information. Flash cookies are different from standard browser cookies because of the amount of, type of, and how data is stored. Cookies may be used for many purposes, including, without limitation, remembering you and your preferences and tracking your visits to our web pages. You can choose to have your computer warn you each time a Persistent or Session cookie is being sent, or you can choose to turn off such cookies through your browser settings. Each browser is a little different, so look at your browser Help menu to learn the correct way to modify your cookies. However, cookie management tools provided by your browser will not remove Flash cookies. If you choose to disable cookies on your Device, some features of the CTHKA Applications may not function properly. For instance, if cookies are disabled, you will not be able to log into the Site and therefore you will experience an anonymous user experience.

Pixel tags and web beacons are tiny graphic images placed on the CTHKA Applications or in our emails that allow us to determine whether you have performed specific actions. When you access the CTHKA Applications or open email messages, the pixel tags and web beacons generate a notice of that action to us, or our service providers. These tools allow us to measure response to our communications and improve the CTHKA Applications and promotions.

We also use embedded scripts which are programming codes designed to collect information about your interactions with the CTHKA Applications, such as the links you click on. The code is temporarily downloaded onto your Device from our web server or a third party service provider, is active only while you are connected to the CTHKA Applications, and is deactivated or deleted thereafter.

We may use HTML5, another form of collection, in our apps for the iPhone or iPad (and any other Apple iOS device). HTML5 is another form of collection, tracking and storage that does not rely on traditional browser cookies. Like Flash cookies, HTML5 cookies can be used to track users across website but are not stored in browsers' cookie files. To our knowledge there is currently no known way for a user of a mobile device to remove HTML5 tracking and storage.

In many cases, the information we collect using cookies and other tools is used in non-identifiable ways, without any reference to Personal Information. For example, we use information we collect about CTHKA Application users to optimize our Products and Services and understand traffic and usage patterns. In other cases, we associate the information we collect using cookies and related technologies with Personal Information. Whenever we associate Usage Information or a Device Identifier with your Personal Information, we will treat it as Personal Information.

### **Information You Provide About a Third Party**

If you send someone else a communication from the CTHKA Applications, such as sending an invitation to a friend, the information you provide (names, e-mail addresses, etc.) is used to facilitate the communication and is not used for any other marketing purpose unless we obtain consent from that person or we explicitly say otherwise. If that person becomes a customer or registers with us, his/her information will be treated in the same manner as all other customers or registered users. Please be aware that when you use any send-to-a-friend functionality on the CTHKA Applications, your e-mail address may be included in the communication sent to your friend.

### **Information We Collect From Third Parties**

We acquire information from other trusted sources to update or supplement the information you provided or we collected automatically, such as information to validate or update your address or other demographic and lifestyle information. We use this information to help us maintain the accuracy of the information we collect, to target our communications so that we can inform you of products, our Products and Services and offers that may be of interest, and for internal business analysis or other business purposes.

### **Third Party Analytic Technologies**

We use third parties' analytic and tracking tools to better understand who is using the CTHKA Applications, how people are using the CTHKA Applications and how to improve the effectiveness of the CTHKA Applications and its content, and to help those parties serve more targeted advertising to you across the Internet or help us serve more targeted advertising to you. Those third party companies may use cookies, pixel tags or other technologies to collect and store anonymous information such as time of visit, pages visited, time spent on each page of the CTHKA Applications, Device Identifiers, type of operating system used and other website(s) you may have visited. They might combine information they collect from your interaction with CTHKA Applications with personal information they collect from other sources. We do not have access to, nor control over, third parties' use of cookies or other tracking technologies.

Some of the analytic and tracking tools we use are Google Analytics and Google Analytics Advertising. The Google Analytics Advertising features we use include the following:

- Remarketing
- Google Display Network Impression Reporting
- Google Analytics Demographic and Interest Reporting
- Integrated services that require Google Analytics to collect data via advertising cookies and anonymous identifiers

### **HOW WE USE AND SHARE YOUR INFORMATION We use your information, subject to applicable laws, in the following ways:**

- to allow you to register and create an account and profile;
- to share your information with our parent, affiliates and subsidiaries, where we consider appropriate;
- to deliver, provide or process payment for a product or service you have requested;
- to enable you to provide us with feedback, to contact us and for us to contact you;
- to administer promotions you enter such as a contest or sweepstakes;
- to allow your participation in our Communications Services (where available on the CTHKA Applications);
- to allow your participation in any surveys;
- to send you maintenance communications to alert you to changes and updates in our CTHKA Applications'

- policies, Products and/or Services that may affect you;
- to send you communications of interest that you have requested, such as emails or text messages about CTHKA, our Products and/or Services, targeted marketing, and promotional offers;
  - to customize, measure and improve our Products and/or Services, content, and advertising, including generating internal reports about the use of our CTHKA Applications;
  - to personalize your overall experience with the CTHKA Applications;
  - to enforce our Terms of Use;
  - for purposes disclosed at the time you provide your information;
  - to provide investor and career related services; and
  - as otherwise set forth in this Privacy Policy.

**Transactional Communications.** We may send you notices from time to time relating to your account or your orders. These may include order confirmations, invoices, renewals or customer service notifications. We may also send you service-related announcements when it is necessary to do so; for instance, if our Service(s) is/are temporarily suspended for maintenance, or the delivery of a Product is delayed or there is some service issue with something you may have ordered. You may not opt-out of receiving these communications, which are not promotional in nature.

**Authorized Third Party Service Providers.** We may use third party service providers (“Authorized Third Party Service Providers”) to help us operate our business and the CTHKA Applications or administer activities on our behalf. We may share your information with these third parties.

**Feedback.** All comments, feedback or materials submitted by you to us, including feedback, testimonials, images, reviews, questions, comments, suggestions or ideas (collectively, “Feedback”), shall be received and treated by us on a non-confidential and unrestricted basis. CTHKA will be free to use, display, perform, distribute, copy, adapt, and promote, in any medium now known or later developed, without compensation to you, the Feedback along with all ideas, concepts, know-how, techniques or methodologies contained in such Feedback, for any purpose whatsoever, including without limitation, developing, marketing and selling our Products and Services incorporating such Feedback. You agree that in submitting Feedback, it will not violate any right of any third party, including any confidentiality, copyright, trademark, privacy or other personal or intellectual property or proprietary rights, and will not cause injury to any person or entity. You further agree that no Feedback you submit will be or contain libelous or otherwise unlawful, threatening, abusive or obscene material, or contain viruses, commercial solicitations, or any form of “spam”.

**Sweepstakes, Contests and Promotions.** We may offer sweepstakes, contests, and other promotions (any, a “Promotion”) that may require registration. By participating in a Promotion, you are agreeing to official rules that govern that Promotion. If you choose to enter a Promotion, Personal Information may be disclosed to third parties or the public in connection with the administration of such Promotion and as required by law or permitted by the Promotion’s official rules. In addition, if you choose to enter a Promotion, the Personal Information you provide to us will be used by us in accordance with the terms of this Privacy Policy.

**Legal Matters; Safety.** We may, without your consent, access and disclose your information, any communications sent or received by you (including, without limitation, the contents of any chat, messaging, or other communication posted in the Communication Services), and any other information that we may have about you or your account as may be permitted or required by law (including, but not limited to, court order or subpoena), or to prevent or investigate suspected fraud, violations of our Terms of Use or activity that appears to us to be illegal or may expose us to legal liability. Additionally, we may disclose your information and/or communications in situations that we believe to be: (i) emergencies involving potential threats to the physical safety of any person or property if we believe that your information in any way relates to that threat; or (ii) your conduct on the CTHKA Applications or when using the Communication Services that we believe is inappropriate and inconsistent with generally accepted norms of behavior.

**Sale or Transfer of Business or Assets.** In the event that we, or any of our businesses, are sold or disposed of as a going



concern, whether by merger, sale of assets or otherwise, or in the event of an insolvency, bankruptcy or receivership, personally identifiable information (including all Personal Information) of our customers and visitors to our CTHKA Applications may be one of the assets sold or merged in connection with that transaction. In addition, information about our customers and registered users may also be disclosed in connection with a commercial transaction where we or any one of our businesses are seeking financing, investment, support or funding.

## ACCESS TO YOUR INFORMATION

If you have an online account with us, you also may choose to resign and deactivate or otherwise manage your account at any time. If for any reason you are concerned that the Personal Information you provided to us is not correct and you wish to change it, please email us at [helpdesk@cthka.net](mailto:helpdesk@cthka.net). We will be happy to review, update or remove information as appropriate. If you deactivate your account, we may still retain certain information associated with your account for analytical purposes and recordkeeping integrity, as well as to prevent fraud, resolve disputes, enforce our Terms of Use or other policies, take actions we deem necessary due to technical and legal requirements, and as dictated by constraints related to the security, integrity and operation of our CTHKA Applications. In addition, if certain information has already been provided to third parties as described in this Privacy Policy, retention of that information will be subject to those third parties' policies. We may still retain your information in our files however, to resolve disputes and enforce our Terms of Use.

## IMPORTANT DISCLOSURES, PRACTICES AND CONTACT INFORMATION

**Links to other Website(s) and Communities.** To the extent hyperlinks may be utilized to access external or third party website(s) and communities, you should be aware that these external or third party website(s) and communities are not controlled by us and, therefore, are not subject to this Privacy Policy. We recommend that you check the privacy policies of each such website and community to determine how your personal information will be utilized by their proprietors.

**Security.** We maintain physical, electronic and procedural safeguards to protect the confidentiality and security of information transmitted to us. To guard your information delivered to us electronically, the CTHKA Applications may use own Secure Sockets Layer (SSL) or provided by third party. SSL encrypts your credit card number, name and address so only we are able to decode your information. Unfortunately, however, no data transmission over the Internet can be guaranteed to be 100% secure. As a result, while we strive to protect your contact information, to the extent permitted by law, we do not guarantee or warrant the security of any information you transmit to or from the CTHKA Applications, and you do so at your own risk.

We urge you to keep any password that you establish with us in a safe place and not to divulge it to anyone. Also remember to log off your account and close your browser window when you have finished your visit. This is to ensure that others cannot access your account, especially if you are sharing a computer with someone else or are using a computer in a public place.

**A Note to International Users.** The CTHKA Applications are operated in Hong Kong. If you are located anywhere outside of Hong Kong, please be aware that information we collect will be transferred to, processed and stored in the United States. The data protection laws in the United States may differ from those of the country in which you are located, and your Personal Information may be subject to access requests from governments, courts, or law enforcement in the United States according to laws of the United States. By using the CTHKA Applications or providing us with any information, you consent to this transfer, processing and storage of your information in the United States. You are also consenting to the application of United States federal law in all matters concerning the CTHKA Applications and this Privacy Policy.

**Children's Privacy.** The CTHKA Applications are generally intended for general adult audiences and are not directed or

intended for children under 13 years of age. We do not knowingly collect Personal Information from individuals under 13 years of age on any of the CTHKA Applications. If you are under 13 years of age, you should not register or provide Personal Information on the CTHKA Applications. If we later obtain actual knowledge that a user who has provided Personal Information is under 13 years of age, we will take steps to remove that user's Personal Information from our systems.

**Changes to the Privacy Policy.** We may change this Privacy Policy from time to time. The most recent version of the Privacy Policy will always be posted on the CTHKA Applications, with the "Effective Date" posted at the top of the Policy. We may revise and update this Privacy Policy if our practices change, as technology changes, or as we add new CTHKA Applications or Communication Services or change existing ones. If we make any material changes to our Privacy Policy or how we handle your Personal Information, you will know because the Effective Date of the Privacy Policy will change. By accessing the CTHKA Applications and/or purchasing our Products and Services after the Effective Date, you are deemed to consent to our then-current Privacy Policy for information captured after the Effective Date of that Privacy Policy.

**Disputes.** If you choose to visit the CTHKA Applications your visit and any dispute over privacy is subject to this Privacy Policy and our Terms of Use including limitations on damages, resolution of disputes, and application of the laws of Hong Kong, supplemented by the laws of the United States.

**No Rights of Third Parties.** This Privacy Policy does not create rights enforceable by third parties or require disclosure of any Personal Information relating to users of the CTHKA Applications.

**Contacting Us.** If you have any questions about this Privacy Policy, or the practices of the CTHKA Applications and Communication Services, please write to us at:

Administrator, CTHKA Privacy Policy  
China Trading (H.K.) Agency Limited  
Blk. A, 15/F Hillier Comm. Bldg., 65-67 Bonham Strand East,  
Sheung Wan, Hong Kong  
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