

Privacy Policy and Personal Information Collection Statement (the “Privacy Statement”)

Thank you for visiting Ximbo. We respect your privacy and are committed to maintaining the privacy and confidentiality of personal data collected. The information below is designed to inform you of what information we collect, why we collect such information, and how we use the information we collect.

By visiting Ximbo websites or are otherwise providing your personal information to Ximbo via any other means, you are accepting and consenting to the practices described in this Privacy Statement.

For purposes of this Privacy Statement, the term “visitor” includes visitors to our websites who are not yet customers, those who become customers, as well as those who do not become customers; whether you upload information to our websites, download it, or are merely visiting our websites. You can choose not to provide certain information when using our websites but then you might not be able to take advantage of many of its features.

1. Privacy Policy

Our Pledge

We are committed to safeguarding the privacy of individuals with respect to personal data. We ensure that our policies and practices in relation to the collection, use, retention, transfer and access of personal data comply with the requirements of the Personal Data (Privacy) Ordinance (Chapter 486) under the laws of Hong Kong (the “Ordinance”).

Cookies

When you visit our website(s), we will record your visit only and will not collect any personally identifiable information (i.e. information that is about you and identifies you) from you unless otherwise stated. Cookies used (if any) in any part of our website will not be deployed for collecting personally identifiable information. For your information, Cookies are small computer files that can be stored in web surfers' computers for the purposes of obtaining configuration information and analysing web surfers' viewing habits. They can save you from registering again when re-visiting a website and are commonly used to track your preferences in relation to the subject matter of the website. You may refuse to accept Cookies (by modifying the relevant Internet options or browsing preferences of your computer system), but to do so you may not be able to utilize or activate certain available functions in our websites.

Collection of personal data

At times, you may be required to give your personal data including, but not limited to, your name, company name, telephone number, fax number, postal address, email address, password, account ID, credit card information, bank account number, identification document copies and details of online transactions (collectively “personal data”). Refusal to provide such information may deny you of access to certain parts of our website and service, or may render us unable to handle any application or request you are making, or may otherwise defeat the objectives of your visit and service request. If you are under the age of 18, consent from your parent or guardian is required before you give us the Personal Data.

Use of Personal Data Collected

Specific purposes for which your personal data may be used are set out in our Personal Information Collection Statement in Part 2 below.

Retention of Personal Data

In your dealings with us and for auditing and verifying purposes, your personal data and records of your online transactions will be kept and retained by us for a reasonable period. Such information will be erased from our system in accordance with our internal policy.

Access to and Correction of Personal Data

Under the Ordinance, you have the right to:

- i. check whether we hold any of your personal data;
- ii. access your personal data held by us;
- iii. require us to correct any personal data which is inaccurate;
- iv. ascertain our policies and practices established (from time to time) in relation to personal data and the types of personal data held by us.

If you want to access and/or correct the personal data that you have provided to us, or if you want to ascertain our policies and practices in relation to personal data and the kind of your personal data held by us, please call our customer service team at (852) 3655 3761 or email at cs@ximbo.com.

We will respond within 40 days after receiving the request. We may charge you a reasonable fee for each personal data access. However, such fee will be waived if the data access is made for the purpose of correcting your personal data.

Security

All personal data you provide to us is secured on our website with restricted access by authorized personnel only. Our online registration process uses the SSL protocol link for data transmission so as to protect your data via encrypting it in a secure format to ensure its privacy is maintained.

2. Personal Information Collection Statement

A visitor of our websites (websites refers to all the websites operating under Ximbo Internet Limited including, but not limited to <http://www.ximbo.com> and <http://asia.ximbo.com>), it may be necessary for you to provide us with your personal data when you apply to us and / or continue a service subscription with us. If your personal data is incomplete or incorrect, we may not be able to provide or continue to provide services to you.

We shall keep your personal data confidential at all times. Our policies and practices with respect to the collection, use, retention, disclosure, transfer, security and access of personal data will be in accordance with the Ordinance and this Privacy Statement.

We may use and retain the personal data you provided to us for the following purposes and for other purposes as may be agreed between you and us or required by law from time to time:

- a. processing your service application;
- b. providing you with the services;
- c. subject to your consent, we may use your personal data (including your name, company name, telephone number, fax number, postal address and email address) for marketing, promotional and customer relationship management purposes certain nature of goods and/or services relating to us via telephone calls, SMS messages, email, direct mailings and social media.
- d. the normal management, operation and maintenance of the service;
- e. designing new or improving existing services provided by us, our websites, our vendors or our service partners to you;
- f. investigation of complaints, suspected suspicious transactions and research for service improvement;
- g. prevention or detection of crime;
- h. disclosure as required by law;

We may disclose and transfer (whether in Hong Kong or overseas) your personal data to the following parties to use, disclose, process or retain your personal data for the purposes mentioned above:

- i. Our service vendors, contractors and other service partners for the provision of products and/or services that you ordered and/or subscribed to;
- ii. Banks, financial institutions and credit providers;
- iii. Debt collection agencies, credit reference agencies and security agencies;
- iv. Regulatory bodies, law enforcement agencies and courts;
- v. Our professional advisers, and any other persons under a duty of confidentiality to us; and
- vi. Any of our actual or proposed assignees or transferees of our rights with respect to you.

If you do not wish to receive direct marketing promotional information from us with respect to the products/services mentioned above, or do not wish us to disclose, transfer or use your personal data for the aforesaid direct marketing purposes, please call our customer service team at (852) 3655 3761 or email at cs@ximbo.com.

Please note that this Privacy Statement may be amended from time to time without prior notice. You are advised to check for the latest version on a regular basis.

Last Update: 20 March 2013