



## **PRIVACY POLICY**

(version 01-April-2024)

Please read this Privacy Policy to understand how DCCONNECT Global Limited., and its related, affiliated, holding and subsidiary companies (collectively referred to as “DCCONNECT”, “our”, “us”, or “we”) handle the Personal Data that you provide us. By providing your Personal Data to us, you are consenting to this Privacy Policy, our collection, use, access, transfer, storage and processing of your Personal Data as described in this Privacy Policy.

DCCONNECT strive to comply with applicable data protection and privacy legislation and regulations (“Applicable Laws”), that may include, without limitations, the Personal Data (Privacy) Ordinance (Cap. 486) of the Laws of Hong Kong Special Administrative Region (“the PDPO”), the General Data Protection Regulation (EU) 2016/679 (“GDPR”) and the Malaysia Personal Data Protection Act 2010 (“the PDPA”). To the fullest extent provided by Applicable Laws, and subject to your valid consent when required by Applicable Laws, your continued use of this website after notice shall constitute your acceptance of this Privacy Policy.

For the purposes of this Privacy Policy, the expression “you”, “yours” or any related expression shall mean a natural person, including those who are employees, customers or suppliers of DCCONNECT, as well as natural person trading as a sole trader or those comprising a corporate company. This Privacy Policy also extends to prospective customers who have not created any account on our website or API. Even in cases where you are no longer an employee, customer or supplier of DCCONNECT, or you engage with us despite not being an existing employee, customer or supplier, this Privacy Policy remain applicable to you.

### **1. Interpretation**

1.1 In the context of this Privacy Notice, the following capitalized term shall carry the meanings assigned to them:-

#### 1.1.1 “Personal Data”

In order to provide Services, we may collect information about you from time to time, including (but not limited to) information being processed in the following categories:

- (a) It is being processed wholly or partially by automated equipment, operating in response to specific instructions provided for that purpose.
- (b) It is recorded with the intention that it should be wholly or partially processed by such automated equipment.
- (c) It is recorded as part of a relevant filing system, or with the intention that it should become part of a relevant filing system, and relates directly or indirectly to a data subject who can be identified or is identifiable based on that information or in conjunction with other data in the possession of a data user.
- (d) This also includes any Sensitive Personal Data (as defined in the PDPA) and expressions of opinion about the data subject.

“Privacy Policy” Means this Privacy Policy and any other amendments, supplements and/or additions that may be incorporated into it from time to time.

“Processing” Means activities related to collection, recording, verification, holding, or storage of Personal Data, as well as the execution of any operation or a series of operations involving Personal Data, including:

- (a) the management, adaptation, or alteration of Personal Data;
- (b) the retrieval, consultation, or use of Personal Data;
- (c) the disclosure of Personal Data through transmission, transfer, dissemination, or others means of making it available; or
- (d) the alignment, combination, correction, erasure or destruction of Personal Data.

“Services” Means collectively all the products and services offered by DCCONNECT.

## 2. Personal Data we collect

2.1 In order to provide Services to you, we may collect information from you from time to time, including but not limited to information in the following categories:-

- (a) Identification data such as your name, date of birth, and other particulars listed on your identity card or any travel document, student card, and/or driver's license.
- (b) Contact details, encompassing your address, phone number, mobile telephone number and/or email address;
- (c) Electronic identification data such as the Internet Protocol (IP) addresses used to connect your computer to the internet (from which we can derive your approximate location), your login details, browser type and version, time zone settings, browser plug-in types and versions, operating system, and platform and cookies;
- (d) Information about your usage of and interaction with our mobile applications, computer programs, software, products, and websites (including computer, API, platform, device and connection information, client performance information, error reports, device capability, bandwidth, statistics on page views, browser type and usage statistics);
- (e) Traffic data such as data processed for the purpose of the conveyance of communication or the billing;
- (f) Payment details, which include credit card, debit card and other electronic banking data;
- (g) Account particulars or data associated with Services registered with us including the relevant PINs, username, passwords, account numbers and/or service numbers;
- (h) Device-specific information, such as hardware model, operating system, version, unique device identifier, serial numbers, setting configurations, software and mobile network configuration;
- (i) information regarding your usage of our services, such as your network usage, how you utilize our network, and your location when you use our services.
- (j) Information about your website visits, including complete Uniform Resource Locators (URLs), clickstreams to, through, and from our websites (along with the date and time), products you viewed or searched for, page response times, download errors, duration of visits to specific pages, page interaction data (such as scrolling, clicks, video views, and mouse-overs), and methods used to navigate away from the page.
- (k) all data requested by relevant government authorities, courts, law enforcement or other authorities, or regulatory bodies, to ensure our compliance with any law, rule, regulation, judgment or court order; and
- (l) any other data as may be required by any employees of DCConnect and/or their respective contractors, sub-contractors, intermediaries, agents, business partners or representatives, brokers, underwriters, as necessary, for the provision of our Services.

You are not obliged to supply to us your Personal Data, however, we may be unable to process your application and/or provide you with our Services. Accordingly, it is obligatory for you to provide us with your Personal Data. We will indicate in the relevant forms or application whether the provision of the required personal data is on a voluntary basis. In addition, your online session data may also be collected indirectly on an aggregated and anonymous basis.

## 3. Purpose of Collecting Your Personal Data

3.1 Our primary purpose in collecting Personal Data from you is to provide you with a safe, seamless, efficient and customized experience. Subject to your consent where required by applicable laws, we collect and use, or have third party service providers acting on behalf of us collecting and using, Personal Data relating to you, as permitted necessary to:-

- 3.1.1 To process your application for the Services and loyalty program.
- 3.1.2 To conduct KYC due diligence processes and credit checks for the detection, prevention, and resolution of fraud, security, or technical issues. This includes the registration and activation of your account with us, as well as the management of any previous or outstanding breaches or indebtedness you may have with third parties.
- 3.1.3 To enforce our contractual rights;
- 3.1.4 To update and maintain DCConnect's internal records, filings, business systems, and infrastructure. This includes testing and upgrading systems, as well as the operation and administration of the Services, including billing and charging you for our Services;
- 3.1.5 To conduct training for internal staff related to the Services you have subscribed to;

- 3.1.6 To enforce any obligation you have regarding the Services, including collection of the amounts due from you;
- 3.1.7 To activate, manage or administer payment or credit facilities with third party financial institutions, s instructed by subscribers of the Services.
- 3.1.8 To investigate, resolve and for troubleshooting of any service issues, billing queries, complaints, fraudulent activity or other enquiries that you submit to us regarding our network, monitor and improve the performance of our network, our Services, service providers and DCConnect websites;
- 3.1.9 To conduct market analysis, research and development to improve and/or to introduce Services to you;
- 3.1.10 To comply with our telecommunications licence obligations regarding interconnection arrangements with other telecommunications operators industry practices;
- 3.1.11 To adhere to any requirements of laws, regulations, or directives from national, enforcement, or regulatory bodies/agencies related to the Services.
- 3.1.12 To impose on you the obligation to provide us with Personal Data of other individuals (e.g., "Users"). This may include confirming your compliance, informing those individuals of the use, disclosure, and transfer of Data from you to us and from us to third parties, and obtaining authorization and/or consent from those individuals for such use, disclosure, and transfer.
- 3.1.13 To protect your and DCConnect's interests, including in particular to enforce our General Terms and Conditions of Services and prevent and fight against fraud; and
- 3.1.14 Any other purposes incidental and associated with the above.

#### **4. How We Collect Personal Data**

- 4.1 We collect your data directly in various ways, such as when you provide data by phone or via email, attend our functions, complete an application form or agreement for one of our services, or when you submit your data through our websites, mobile apps, or API. Additionally, we may collect data during the ordinary course of our business relationship with you or when legal requirements mandate it.
- 4.2 We gather data from each of your visits to our website. This is achieved through common tracking technologies like cookies (small files stored on your browser or computer's hard drive to enhance your website interaction) and web beacons (tiny graphics files containing unique identifiers to recognize past email recipients or website visitors). Some cookies are strictly technical and necessary for the website's proper functioning, while others track user behavior in an aggregated and anonymous manner. Cookies designed to track your behavior in a personally identifiable manner are only deployed on your device if you provide your consent during your initial visit to our website.
- 4.3 We may also receive data from third parties, such as related entities, business partners, other customers, or your representatives, provided they have obtained appropriate consent from you.
- 4.4 We may source data from publicly available resources.
- 4.5 We may collect data when you visit DCConnect websites, including our API, or when you call our helpdesk or making general inquiries about our Services.

#### **5. Disclosure and Transfer of Your Personal Data to Third Parties**

Except as provided below, we will not sell, rent, trade or otherwise transfer any Personal Data without your explicit permission, unless it is obligated to do so under Applicable Laws or by order of competent jurisdiction

- 5.1 In order to provide the Services that you have requested, DCConnect may, to the extent permissible under Applicable Laws and regulations, disclose your Personal Data to the following third parties:
  - a) data processors, who are service providers and suppliers who provide:
    - (i) services relates to customer enquiries;
    - (ii) courier, delivery, logistic and warehouse services;
    - (iii) mailing operations;
    - (iv) billing and debt-recovery functions;
    - (v) information technology services;
    - (vi) installation, maintenance and repair services;
    - (vii) marketing, advertising and telemarketing services;
    - (viii) market research;
    - (ix) customer usage and behavioural analysis;
    - (x) process management;
    - (xi) after sale services;
    - (xii) surveys;

- (xiii) website usage analysis;
  - (xiv) cloud storage services; and
  - (xv) network connectivity services, including international and local connectivity service of any technology types such as IPT, DWDM, IPLC and etc.
- b) your authorised representatives and/or your legal advisers when requested by you to do so;
  - c) for the purposes of providing administrative, payment, collection, business, legal and/or operational support to the following parties:
    - (i) credit-reporting and fraud-checking agencies;
    - (ii) financial institutions, charge or credit card issuing companies, credit providers, credit bureau, collection agencies or security agencies;
    - (iii) telecommunications network operators; and
    - (iv) our professional advisers, including our accountants, auditors, lawyers and insurers;
  - d) organisations who manage our business and corporate strategies, including those involved in a transfer or sale of all or part of our assets or business and those involved in managing our corporate risk and funding functions;
  - e) to any proposed or actual participant, assignee or transferee of all or any part of the relevant member of our operations or business;
  - f) companies in the same group as us;
  - g) local and foreign regulators, governments, law enforcement authorities, advisors, courts and tribunals; and
  - h) other third parties, with your consent.

5.2 Save and except with your express consent, we shall maintain strict confidentiality of your Personal Data and not disclose any portion or part thereof to any other entity or third party aside from the ones listed in 5.1 above.

## **6. Security, Storage & Duration of Data Retention**

6.1 We shall ensure that all Personal Data collected by it shall be stored and/or filed in such manner as to ensure that the Personal Data maintains its accuracy, integrity, remains confidential, is protected against loss, misuse, modification and unauthorised or accidental access, disclosure, alteration, destruction or manipulation.

6.2 We keep your Personal Data while you are our customer or after you have stopped to use the Service, but only when necessary or as required by Applicable Laws. We will take appropriate organizational and technical measures to protect the Personal Data and traffic data provided to it or collected by it with due observance of the applicable obligations and exceptions under the relevant legislation. Your Personal Data and traffic data can only be accessed by authorized employees or third parties, and will only be retained for as long as is necessary to fulfil the original or directly related purposes for which it was collected, unless the personal and traffic data is also retained to satisfy any Applicable Laws or contractual obligations.

## **7. Direct Marketing**

7.1 Subject to your valid consent and in strict Accordance with the Applicable Laws, we may process your Personal Data to communicate with you any information not limited to promotions, marketing and advertising materials in relation to us, our Services and those of our preferred merchants and strategic partners.

7.2 We may not use your Personal Data for direct marketing unless we received your valid consent in accordance with Applicable Laws. If you wish to stop receiving direct marketing materials from us, you may write to us any time. In any such request, please state clearly your personal information and contact details for identification purposes.

## **8. Use of cookies and location data**

8.1 Cookies are packets of information stored in your computer or device which assist your website navigation by customizing site information tailored to your needs. Please note cookies in themselves do not identify the individual user, just the computer or device used. However, we may collect information about your use of our websites or your preference or behaviour analysis from cookies.

8.2 If you visit any of our websites, we may use cookie files to store and track information about you and your preferences. A cookie is a small text file that our website transfers to your device which assist your website navigation by customizing site information tailored to your needs. It allows us to better serve you and/or maintain your information across multiple pages within or across one or more sessions. Most web browsers automatically accept cookies, but if you prefer, you can edit your browser options to block them in future. Cookies contain information about you and your preferences.

8.3 We may use your location data to keep track of your activity patterns and preferences in order to improve the level of service you receive. Your location data may be combined with other information we receive from third parties to provide you with better service and, where you have consented to receive direct marketing, we may provide you with targeted advertisements, content, features, deals and offers.

## 9. Transfer of Personal Data Outside of Hong Kong

9.1 We may transfer your Personal Data to places or third parties located both in Hong Kong and overseas as part of our performance of our contracts or provision of Services to you. These third parties may include any of our service providers or strategic partners who are involved in providing our Services or outsourced data storage or data processing services for and on behalf of us.

## 10. Data access or correction

10.1 You have the right to access and, where relevant, to correct your personal information held by us. We will respond to requests to access, correct or remove your personal information within a reasonable period of time and upon verification of your identity. We will use all reasonable endeavours to accommodate requests to delete personal information unless it is required to be retained by law or for lawful business purposes. In accordance with the Applicable Laws, we reserve the right to charge a reasonable fee for the processing of any data access request.

## 11. Notices and Communications

11.1 Please direct any requests to withdraw consent, to access, correct and/or limit the processing of your Personal Data or any inquiry or complaint on your Personal Data to the following:

**DCCConnect Global Limited**

**Unit 815, 8/F,**

**DT Hub, 5 Chun Cheong Street,**

**TKO Industrial Estate,**

**TKO, NT,**

**Hong Kong**

**Email: [legal@dconnectglobal.com](mailto:legal@dconnectglobal.com)**

11.2 You hereby accept that we may be required to revise and/or modify this Privacy Policy from time to time. In the event of such revision and/or modification, we will communicate such revision and/or modification at our website or such other mode as we may deem appropriate. In this regard, you agree that by continuing to use the Services after such notification, that you have agreed to be bound by, accepted, and/or consented to such revision and/or modification.