

Privacy Policy

This Private Policy provides specific details of how ZA Tech Global Limited (“**ZA**”, “**we**”, “**us**” or “**our**”) treat any personal data you provide us when you visit our website [zatech.com] (“**Site**”).

Kinds of personal data held

We hold two broad categories of personal data:

- 1. Customer records**, supplied by customers to us from time to time in connection with matters and purposes set out in this Privacy Policy.
- 2. Personnel records**, which include but are not limited to curriculum vitae, application forms, references, appraisal and disciplinary records, salary, pension and benefits details, results of medical, security and financial checks, sickness records, personal contact details, bank account and tax details of employees (including potential employees, as applicable), and any other information relevant to the purposes set out below.

Main purposes of keeping personal data

1. In relation to customers: we may collect personal data about you for any of the following purposes:

- (a) considering and processing customers’ applications for the establishment of products or services offered or to be offered by us (collectively, “**Products and Services**”);
- (b) operating and maintaining Products and Services to you;
- (c) meeting our internal operational requirements;
- (d) designing technology products and services for your use;
- (e) meeting or complying with any obligations, requirements or arrangements for disclosing and using data that apply to ZA and its subsidiaries and affiliates (“**ZA Group**”) or that it is expected to comply according to:
 - (i) any present or future law or regulation within or outside Hong Kong;
 - (ii) any present or future guidelines or guidance issued by any legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations of technology services providers (if any) within or outside Hong Kong;
 - (iii) any present or future contractual or other commitment with local or foreign legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory

or industry bodies or associations of technology services providers (if any) applicable to us or any member of the ZA Group by reason of its financial, commercial, business or other interests or activities in or related to the relevant jurisdiction (“**Authorities**” and each, an “**Authority**”); and

(iv) any demand or request from an Authority;

(f) meeting any obligations, policies, measures or arrangements for sharing data and information within the ZA Group and/or any other use of data and information pursuant to any group-wide programmes for compliance with sanctions or prevention or detection of money laundering, terrorist financing, fraudulent activities or other unlawful activities;

(g) enabling an actual or potential assignee of all or any part of our business and/or asset, to evaluate the transaction intended to be the subject of the assignment; and/or

(h) any other purposes relating to the purposes listed above.

2. In relation to employees/potential employees: we may collect personal data about you for any of the following purposes:

(a) considering and processing your employment application;

(b) performing background checks in relation to you;

(c) appraising your job performance and making decisions about your promotion, training, transfer, redeployment or career development;

(d) determining, reviewing and processing payment of your salary, bonuses and any other staff benefits;

(e) taking appropriate action in event of emergencies;

(f) complying with any statutory requests received from relevant public authorities/agencies or any other purpose required by law or regulation;

(g) disciplinary purposes arising from employees' conduct;

(h) providing references / reports to and/or facilitating background checks by potential employers, financial institutions, legal representatives, and other appropriate bodies;

(i) planning succession and talent management initiatives;

(j) monitoring compliance with regulatory requirements and ZA Group's internal policy requirements;

(k) enabling ZA Group to make decisions and/or policies concerning its employees generally;

(l) enabling auditors to conduct regular reviews of ZA Group's business and operations; and/or

(m) supporting any business, technical, administrative or security function required by ZA Group's operations, including: communication and processing systems, security of staff, systems and premises, contingency planning, systems development and testing, business and financial, monitoring planning and decision making.

Security

We respect your privacy and are committed to protect your privacy through compliance with this Privacy Policy. We do not collect from you more information than is necessary for us to process your application or participating in any of our event, initiative, programme or other activities registered through this Site (“**Event**”). We will take all practical steps to ensure that your personal data will be protected against unauthorised or accidental access, processing or erasure by implementing appropriate physical, electronic and managerial measures to safeguard and secure your personal data.

Collect

You may browse the Site without providing any personal data to us. However, if you request receipt of certain notifications, updates, any other information from us or when you choose to complete the forms on our Site, we may collect personally identifiable information (“**PII**”), which you voluntarily give us, including your name, email address, job titles, telephone number, and any other information which would allow someone to personally identify you. Certain non-PII, which does not identify you, may also be collected when you use this Site, including the type of the Internet browser and operating system you use, other navigational clickstream data, etc.

Use

We use your personal data collected through this Site in accordance with this Privacy Policy, including but not limited to (a) share news and updates in response to your enquiries; (b) for security and legal compliance; and (c) notify you of any changes to this Site or an Event. We may make full use of information that is not PII.

Cookies

Web pages on this Site may contain cookies or related technology to facilitate your experience with this Site. Cookies are text files placed in your computer's or mobile's Internet browser to store your preferences. Cookies do not provide your email address or other PII. We may also collect information on which web pages you visited, the links or advertisements you click on and other actions you take while on our Site. We only obtain this information when you choose to provide it to the Site. You may disable cookies in your browser. However, certain functionalities of this Site may not work if cookies are disabled.

Accessing your Personal Data

You have the right to access and update your information and contact us. For example, you may: (a) check whether we hold data about you and/or access to such data; (b) require us to correct any data relating to you which is inaccurate; and (c) ascertain our policies and procedures in relation to data and to be informed of the kind of personal data held by us and/or you have access to.

Disclosure

We will not share your information to others except to our staff, affiliates and trusted third parties when we need to share the information you have requested. We may also share your information to enable an affiliate or trusted third party to provide services to us, and then only to provide those services. We limit as commercially reasonable their access and use of your personal data to that which is necessary to provide these services to us. Without limiting the above, we will share your personal data with third parties only in accordance with this Privacy Policy.

We may also be required by law to disclose your personal data in response to a subpoena, court order, or a request for cooperation from law enforcement or other governmental agencies. Your personal data may also be shared when we believe disclosure is necessary in connection with efforts to investigate, prevent or take other action regarding actual or suspected illegal activity or other wrongdoing, to protect and defend our rights, property or safety, our users, or others. We will use commercially reasonable efforts to make you aware of the disclosure of your personal data contrary to the terms set forth in this Privacy Policy.

Retention Period

We will take all practical steps to ensure that personal data will not be kept longer than necessary and that we will comply with all statutory and regulatory requirements in the Hong Kong Special Administrative Region concerning the retention of personal data.

Changes to This Privacy Policy

We may revise this Privacy Policy from time to time and we encourage you to review our Privacy Policy periodically to be informed of how we collect, store and use your information. You agree that by continuing to access or use this Site, with or without notice from us, you consent to the changes to this Privacy Policy.

Contact Us

You may write to us at privacy@zatech.com for any privacy concerns and requests relating to this Privacy Policy or our Site.

English prevails

If there is any inconsistency or conflict between the English and the other language versions of these Conditions, the English version prevails.