

## **LEEF Jewellery Company Limited Privacy Policy**

### **1. Introduction**

1.1 LEEF Jewellery Company Limited (the “Company”, “we”, “us”) respect the privacy of all customers (“you”). We always comply with the requirements and the Data Protection Principles as set out in the Personal Data (Privacy) Ordinance, Laws of Hong Kong (Cap.486) (the “Ordinance”) when formulating policies and practices in relation to personal data management. This policy is prepared based on the Ordinance. The meaning of the term “personal data” is the same as defined in the Ordinance throughout this policy unless otherwise specified. If our operations are subject to other privacy laws, this policy will apply to the extent feasible and consistent with those laws. We hope that this policy will help you to understand how we collect, use and retain your personal data in accordance with the Ordinance and safeguard your privacy.

1.2 By using this website [www.leefprestige.com](http://www.leefprestige.com), you are accepting the terms of this policy and consenting to our collection and use of your personal data pursuant to this policy. We may amend or update the terms of this policy at any time where necessary, you are recommended to read the latest version uploaded on our websites from time to time to ensure that you are aware of all changes made on this policy.

1.3 Shall there be any discrepancies between the English and Chinese version of this Policy, the English version shall prevail.

### **2. How we collect and use personal data**

2.1 We collect your personal data as agreed by you to fulfil our performance pledges and to offer you personalized experience at our online store.

2.2 Different levels of personal data may be collected depending on your usage of our services:

- (1) If you are not a registered user and you are browsing our websites anonymously as a guest, we will not collect any personal data from you. However, you may not be able to use all features and services that we offer to registered users.
- (2) You are required to input relevant personal data for registration, so that we can process certain features and services to be provided to registered users, such as email updates or personalized services. We may store some of the data provided in respect of those features and services for related projects. You have the right to refuse providing your personal data to us, but we may not be able to provide you with certain services, benefits and functions.
- (3) You may from time to time provide us with your personal data when you apply for and/or use various services offered by us, such as registering as member of any schemes owned or managed by us and as participant of our publicity

and promotional events, purchasing products from us or using our concierge services, contacting us to make enquiries or provide feedback. The personal data that we may collect include your name, gender, date of birth, phone number, mailing address, email address, payment information, etc.

- (4) You may log on to our websites by using the login information for other social network or the other login services linked to our websites. Those service providers may authenticate your identity and provide you with the option to share certain personal data with us, such as your name and email address, in order to complete the default registration form on our websites. Those service providers may also provide you with the option to post the information about your activity at our websites onto your profile page and share with others within your personal network.
- (5) You may use other social network functions, widgets and/or interactive mini programs run on our websites. Those functions are small content modules that may collect personal data, including but not limited to your IP address and your webpage browsing history on our websites, or set cookies to enable proper operation of the functions. Those social network functions are set up by us or third parties on our websites. If the related functions are provided by third parties, the use of your personal data will be governed by the privacy policies of those third parties. Therefore, please read and know about the privacy policies of those third parties, we do not take any responsibility or legal responsibility in respect of such policies.

### 2.3 We may use your personal data for the following purposes:

- (1) Responding to your enquiry or request;
- (2) Promoting our new products and marketing events, please refer to the section "Direct Marketing" for more details;
- (3) Communicating with you based on your personal data provided, for example, via phone, email, SMS, push notifications by mobile applications or postage (including details on our retail services and related rewards);
- (4) Processing your purchase order, including security check and confirmation on your data, verification of your payment details and status, etc.;
- (5) Special functions, such as sharing products with friends, maintaining your wish list, maintaining your shopping bag on our websites;
- (6) Processing your membership registration, maintaining and managing your member account;
- (7) Carrying out data sorting and analysis or customer surveys to enhance our products and services, and to provide you with other services that are more in line with your needs;
- (8) Matching and consolidating your personal data with your information held by us;
- (9) Enabling us to disclose as required under any binding laws, regulations or court orders;
- (10) Investigating complaints and suspicious transactions, preventing and detecting crimes; and
- (11) All purposes directly related to the above.

2.4 We will not keep your personal data longer than the time permitted pursuant to the Ordinance. Besides, we will replenish, rectify or delete any incomplete, inaccurate or unnecessary personal data collected and retained, on our own initiatives or at your request.

2.5 We use Cookies to provide you with personalized shopping experience when you visit our websites again. Cookies are small information files stored on your electronic device or equipment and are automatically accepted by most browsers. You may change the options of your browser to be notified of the setup of new Cookies, delete old Cookies or block Cookies in general. Please note that you may not be able to use all features and services offered on our websites if you have blocked Cookies.

2.6 We automatically collect anonymous information about your online usage to obtain statistical information on the use of our servers and to better meet your demands and expectations. This may include but is not limited to your browser type and version, your operating system, your mobile network, your IP address and/or domain name.

### **3. Third parties**

3.1 This policy does not apply to websites, online services or mobile applications established by other companies or organizations to which we may link or collaborate for promotions.

3.2 Unless mandatorily required by applicable laws, we will not provide any personally identifiable customer information to the third party websites, online services or mobile applications of advertisers or business partners without your consent. If you access any of those websites, online services or mobile applications or submit information to any third parties through the links on our websites, please read and know about the privacy policies on those websites, online services or mobile applications before submitting your personal data. Please note that we do not take any responsibility or legal responsibility in respect of such policies.

3.3 We may provide consolidated statistics on our customers, sales and business footprint and related website information to reputable third parties, but no personal data will be included.

### **4. Security and protection of your information**

4.1 We may use your personal data to perform our customer service commitments. Access to such information is protected by physical, electronic and managerial measures and is limited to our employees and agents for their work needs.

4.2 We will never ask for your personal password in writing or by phone. Please properly protect your password and electronic device or equipment to avoid any unauthorized use.

4.3 Our employees value the confidentiality of your personal data when collecting, using, retaining or transferring any information on behalf of the Company, and strive to safeguard relevant information security.

4.4 While there are always risks associated with providing personal data (whether in person, by phone or over the Internet), and no technical system is completely safe or is able to resist from “tamperers” or “hackers”, we endeavour to adopt appropriate measures to prevent and minimize the unauthorized or accidental access, use or deletion of your personal data. For example, we use encryption technology when collecting or transferring sensitive information like credit card details.

## **5. Children**

5.1 The Company do not use our websites to knowingly solicit information from or market to children or teenagers under the age of 18.

5.2 If you are under the age of 18, your parent or guardian must be informed of this policy and our Terms and Conditions before you use our websites and services. Please provide us with any of your personal data only after the consent from your parent or guardian is obtained.

## **6. Disclosure of your information**

6.1 Your personal data held by us will be kept confidential, but we may disclose your information to the following parties for the purposes or directly related purposes for which such information is collected:

- (1) Any subsidiary or affiliate of the Company, or company controlled by us, or company under common control with us;
- (2) Any person or company who acts on behalf of us, or any person or company who acts jointly with us, in respect of the purposes or directly related purposes for which such information is provided by you; and
- (3) Any other person or company who is under a duty of confidentiality and has undertaken to keep such information confidential, provided that such person or company has a legitimate right to access such information.

6.2 Your personal data may also be disclosed to any other person pursuant to any statutory or contractual obligations, or as required by government authorities or courts, provided that such person can prove the required right/authority to access such information. Besides, your personal data may be disclosed under any of the circumstances described in Part 8 of the Ordinance as exemptions from the provisions of the Ordinance.

## **7. Direct marketing**

7.1 We may use the personal data provided to us by you for direct marketing purpose, but we will not use your personal data for such purpose without your consent. Please note that:

- (1) We may use your name, gender, email address, phone number, city of residence, address, date of birth, service portfolio information, transaction mode and behaviour, and demographic statistics held by us for direct marketing.
- (2) We may use your personal data for marketing our products and services, including jewellery products, accessories, giveaways and related customer services, social networking services, customer reward, loyalty or privilege programs and related products, services and facilities, online shopping services and promotional or social events related to the above.

## **8. Right to access your data**

8.1 Under the Ordinance, you have the right to:

- (1) Request understanding whether we hold your data;
- (2) Request access to the data listed in paragraph 8.1(1); and
- (3) Request correction of the data listed in paragraph 8.1(1).

8.2 You may make the requests as described in paragraph 8.1 by emailing to [info@leefjewellery.com](mailto:info@leefjewellery.com).

8.3 Pursuant to the provisions of the Ordinance, we have the right to charge a reasonable fee for processing any request to access data.

## **9. Disclaimer**

9.1 We reserve the right to amend this policy at any time. This policy does not intend to nor constitute any contractual rights or any other legal rights, nor does it constitute any obligations of the Company (or on behalf of any third parties) to any person or company. This policy does not restrict the rights enjoyed by any person or company under the Ordinance.