

Privacy Policy

Alta Care Ltd (hereinafter: the “Company”) safeguards and respects your privacy. The general purpose of this Privacy Policy (hereinafter: “Policy”) is to inform the users how the Company collects, uses, and discloses information obtained about users of the Company’s website (hereinafter: the “Website”). By visiting the Website, the users confirm to have read and accepted the Terms and this Policy and further agree and confirm that their personal information will be handled as described in this Policy. The use of the Website and any dispute over privacy are subject to this Policy. If you do not agree to the Terms and this Policy, do not connect to, access or use the Website in any manner whatsoever.

WHICH INFORMATION IS COLLECTED

The type of information which is collected depends on the user’s interaction with the Website and may include the following:

- **Information provided directly** by the user that usually includes the name, the phone number, the email address and other contact information provided to the website by the user.
- **Information collected automatically** by connecting to the website that usually includes search terms, viewing history, communications, traffic data, IP address, browser type, operating system version, additional information of how the user interacts with the Website.
- **Information from other sources** relevant to the contents of the Website (e.g. cookies, social media platforms, Google Analytics, Google Ads, Google Tag Manager, AdRoll etc.).
- **Other information collected with your permission**

**The Website is not intended for children under 18 y.o. The Company does not knowingly collect personal information from children under 18 y.o. If you are under 18 y.o., please do not provide any information on this website.*

HOW THE INFORMATION IS USED?

The Company collects the personal information provided by the user alone or in combination with the information collected from the other sources for the following purposes that Company considers its **legitimate interests**:

- To provide the user with the Website and with the services;
- To communicate with the user, including responding to the user’s requests or inquiries;
- To engage and better understand how the user accesses and interacts with the Website;
- To maintain, support, develop, improve, customize, optimize, implement, operate and modify the Website and the services provided, to respond to user preferences, to use a de-identified or aggregate copy of information for the analytical, research and development purposes of the Company, and for research and analytical purposes.
- To prevent fraud, criminal activity or any unauthorized or prohibited use of the Website.

The legal basis for the processing of the personal data can be:

The Consent: The user provides the personal data and specifically consent to the Company using it to obtain a specific service (e.g. receive marketing communications, store cookies on the device etc.);

The Performance of a contract: The user provides personal data in order for the Company to provide the user with a service (e.g. purchase a product etc.);

The legitimate interests aforementioned;

Compliance with a legal obligation: The user provides personal data which the Company needs to keep for legal reasons (e.g. tax and financial reporting obligations).

WHO THE INFORMATION IS SHARED WITH?

The Company may share the collected information about the user as follows:

- **Within Alta Care Ltd:** Where appropriate, the Company may share your personal data to harmonise and update the information the user shares with us, to tailor the communications based on user's preferences, and to run analytics and perform statistics.
- **With Service Providers:** The Company may disclose the user's information to third parties, including service providers, independent contractors, and affiliates that perform functions on the Company's behalf and process the information on the Company's behalf and under the Company's instructions.

The Company may also share personal information with the business partners and for business purposes such as development and research on non personal de-identified basis. The Company may share the user's information in case of dispute, to comply with a legal obligation and in other circumstances where the Company has user's consent and permitted to do so by law. The Company does not share the user's personal information with third parties for any other purpose.

WHERE THE PERSONAL DATA IS STORED?

The personal data collected by the Company is stored by Alta Care Ltd. It may be processed by staff operating internationally who works for the Company. The data transfer of data outside the Company will be done in a secure and lawful way. The personal data also may be subject to access by law enforcement and other government entities in accordance with the laws applicable in those jurisdictions.

HOW SECURE IS MY PERSONAL DATA?

The Company is committed and has implemented reasonable precautions to keep the user's personal data secure. The Company requires that trusted third parties who handle the user's personal data for the Company do the same. Please be aware that despite the strict control and best efforts, no data security measures can guarantee absolute security. Therefore, any transmission is at user's own risk.

HOW LONG DOES THE COMPANY KEEP THE PERSONAL DATA?

The personal data is kept for as long as the Company needs it to provide the user with the requested service(s) or to meet the Company's commercial or legal obligations. The personal data may be kept for the following periods provided that the user participates in promotional offers, the user has consented to receive marketing communications, the user has consented to store cookies on the device.

When the Company no longer needs to use the user's personal data, it is removed from the systems and records, or anonymised so that the user can no longer be identified from it. Pursuant to the European General Data Protection Regulation (GDPR), the user has the right to withdraw the consent at any time.

WHAT ARE MY RIGHTS WITH RESPECT TO MY PERSONAL INFORMATION?

- Right to access and be provided with information on the processing of your personal information;
- Right to have your personal data rectified if such personal data is inaccurate or incomplete;
- Right to have your personal data forgotten or deleted except cases where the Company is under a legal obligation to keep it;
- Right to withdraw consent at any time for and personal data processing based on consent;
- Right to restrict the processing of your personal information if the accuracy of the personal data is contested by you, if the processing is unlawful and you oppose the erasure, if it is no longer needed

for the purposes of its processing, but you require it for the establishment, exercise or defence of a legal claim; if you object to processing of your personal data, pending the verification whether the Company's legitimate grounds override your rights and freedoms.

- Right to turn on/off cookies.

FUTURE CHANGES OF PRIVACY POLICY

The company may update this Privacy Policy as necessary to reflect changes the Company makes and to satisfy legal requirements. The user is invited to check back this notice periodically. If the changes the Company makes to this Policy may materially affect its practices with regard to the collected personal information, the Company will endeavour to provide you with notice in advance.

CONTACTS OF DATA CONTROLLER AND DPO

If you have a question about this privacy policy, you can contact Alta Care Ltd via altacare@altacare.com or by writing to us at:

Alta Care Ltd

RM 144, 1/F, Godfrey Centre,

Sham Shui Po, Kowloon,

Hong Kong