

# Privacy Policy

## 1. INTRODUCTION

### 1.1. Purpose of this Privacy Policy

LPM Group Limited (referred to in this Privacy Policy as “LPM”, “we”, “us” or “our”) respects your privacy and is committed to protecting your personal data. This Privacy Policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This Privacy Policy aims to give you information on how LPM collects and processes your personal data through your use of this website, including any data you may provide through this website when you sign up to our newsletter, purchase any products or services and/or take part in a competition.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this Privacy Policy together with any other Privacy Policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Policy supplements other notices and Privacy Policies and is not intended to override them.

### 1.2. Data Controller

LPM is the “data controller” of your personal data.

In simple terms, this means that we (i) “control” your personal data, including making sure that it is kept secure; and (ii) make certain decisions on how to use and protect your personal data, but only to the extent that we have informed you about the use or as otherwise permitted by law.

### 1.3. Contact Information and Complaints

If you have any questions about this Privacy Policy or any questions regarding our use of your personal data, please contact our data privacy manager at [sales@lpm.hk](mailto:sales@lpm.hk)

Our full contact details are:

2/F, 33 Des Voeux Road Central, Central, Hong Kong

Within the European Economic Area, you have the right to make a complaint at any time to your country's supervisory authority for data protection issues.

We would, however, appreciate the chance to deal with your concerns before you approach your country's supervisory authority, so please contact us in the first instance.

### 1.4. Changes to this Privacy Policy and Personal Data

This Privacy Policy is regularly reviewed and was last updated on 24/09/2019. We may amend or update our Privacy Policy from time to time. For this purpose, we will provide you notice of amendments to this Privacy Policy and update the “last updated” date above.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## 1.5. Third-Party Links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

## 2. THE DATA WE COLLECT ABOUT YOU

The types of personal data we collect, use and store about you will depend on the services you have requested from us and/or the nature of your interaction with us. When using our website, we collect and process the following types of personal data:-

- your first name, last name, username or similar identifier, date of birth, country of residence and gender (“**Identity Data**”);
- your billing address, delivery address, email address and telephone numbers (“**Contact Data**”);
- your bank account, payment card and PayPal account details (“**Financial Data**”);
- details about payments to and from you and other details of products and services you have purchased from us (“**Transaction Data**”);
- your IP address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website (“**Technical Data**”);
- your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses (“**Profile Data**”);
- information about how you use our website and services (“**Usage Data**”); and
- your preferences in receiving marketing material from us and our third parties and your communication preferences (“**Marketing and Communications Data**”).

We do not collect any special categories of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

## 3. HOW WE COLLECT YOUR DATA

### 3.1. Direct Interactions

We collect Identity Data, Contact Data and Financial Data about you that you provide to us by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:-

- apply for our products or services;
- register on our website;
- subscribe to our newsletter;
- request other marketing material to be sent to you;
- enter a competition, promotion or survey; or
- give us feedback or contact us in any way or form.

## **1.2. Automated Technologies and Interactions**

As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.

A cookie is a small file of letters and numbers stored by computer after being sent to your computer when you visit a website. Whenever you visit the same website again, the information stored in the cookie can be retrieved to notify the website of your previous activity. We use cookies to facilitate website navigation, maintain quality of online service, provide additional security, allow the customization of your access to the website and remember you when you return to the website.

A cookie cannot give us access to your computer or to information beyond what you provide us and we don't store personally identifiable information such as your name or address in cookies we create, but we do use encrypted information gathered from them to help improve your experience of the website. If you do not wish to enable cookies, you'll still be able to browse the website and use it for research purposes.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

When you visit our website, you may notice some cookies that are not related to LPM. If you go on to a website that contains embedded content you may be sent cookies from these websites. We do not control the setting of these cookies, so we suggest you check the third-party websites for more information about their cookies and how to manage them.

To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

## **1.3. Third Parties**

We are also working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies).

We will receive personal data about you from such third parties as set out below:-

- Technical Data from the following parties:-
  - analytics providers such as Google Analytics,
  - advertising networks such as Google Analytics; and
  - search information providers such as N/A.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as PayPal, Jetco.

## **4. HOW WE USE YOUR PERSONAL DATA**

### **4.1. Data Usage**

We are committed to only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you (“**Performance of Contract**”).
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests (“**Legitimate Interests**”).
- Where we need to comply with a legal obligation (“**Legal Obligations**”).

We plan to use your personal data for the following purposes, and pursuant to the corresponding legal bases:

<b>Purpose</b>	<b>Type of Data</b>	<b>Lawful Basis and Basis of Legitimate Interest</b>
Registration as a new customer	Identity Data; Contact Data.	Performance of Contract
Processing and delivery of your order	Identity Data; Contact Data; Financial Data; Transaction Data; Marketing and Communication Data.	Performance of Contract; Legitimate Interest (to recover debts due to us).
Management of our relationship with you  (i.e. notifications about changes to Privacy Policy and asking you to leave a review or take a survey)	Identity Data; Contact Data; Profile Data; Marketing and Communication Data.	Performance of Contract; Legal Obligations; Legitimate Interest (to keep your records updated and to study how customers use our products/services).
Enabling you to partake in a prize draw, competition or complete a survey	Identity Data; Contact Data; Profile Data; Usage Data; Marketing and Communication Data.	Performance of Contract; Legitimate Interest (to study how customers use our products/services and grow our business).

Administration and Protection of our Website  (including troubleshooting, data analysis, testing, system maintenance, support reporting and hosting of data)	Identity Data; Contact Data; Technical Data;	Legitimate Interest (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise);  Legal Obligations
Delivery of relevant website content and advertisements to you and understanding the effectiveness of the advertising we serve to you	Identity Data; Contact Data; Profile Data; Usage Data; Marketing and Communication Data; Technical Data.	Legitimate Interest (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy).
Using data analytics to improve our website, products/services, marketing, customer relationships and experiences	Usage Data; Technical Data.	Legitimate Interest (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy).
Suggestions and recommendations about goods or services that may be of interest to you	Identity Data; Contact Data; Profile Data; Usage Data; Marketing and Communication Data.	Legitimate Interest (to develop our products/services and grow our business).

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please feel free to contact us any time.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 1.2. Marketing and Promotional Offers

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

We may use your Identity Data, Contact Data, Technical Data, Usage Data and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

You will receive marketing emails and newsletters from us if you have requested information from us or purchased products or services from us, or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have expressly consented to receiving such marketing emails and newsletters.

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

### **1.3. Opting Out**

You can ask us or third parties to stop sending you marketing messages at any time by:-

- by contacting us anytime at sales@lpm.hk;
- by logging into our website and checking or unchecking relevant boxes to adjust your marketing preferences;
- by checking or unchecking relevant boxes to adjust your marketing preferences at check-out when purchasing items on our webpage;
- by following the opt-out links on any newsletter or marketing message sent to you.

Where you opt-out of receiving these marketing messages or newsletters, this will not apply to personal data provided to us as a result of a product or service purchase, product or service experience or other transactions (which we will continue to process in order to perform a contract with you or as a result of our regulatory or legal obligations).

## **5. DISCLOSURES OF YOUR PERSONAL DATA**

We may share your personal data with the following parties for the purposes set out in the table above:-

- External Third Parties as set out in Clause 10 (*Glossary*) below; and
- third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **6. INTERNATIONAL TRANSFERS**

We share your personal data within our company. This will involve transferring your data to Hong Kong and other jurisdictions outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection as in the EEA is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see [European Commission: Adequacy of the protection of personal data in non-EU countries](#).
- We may use specific contracts or contract clauses approved by the European Commission which give personal data the same protection it has in Europe. For further details, see [European Commission: Model contracts for the transfer of personal data to third countries](#).
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US. For further details, see [European Commission: EU-US Privacy Shield](#).

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## **7. DATA SECURITY**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **8. DATA RETENTION**

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our customers (including Contact Data, Identity Data, Financial Data and Transaction Data) for seven (7) years after they cease being customers for tax purposes.

In some circumstances, you can ask us to delete your data: see Clause 9 (*Your Legal Rights*) below for further information.

In some circumstances, we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## **9. YOUR LEGAL RIGHTS**

## 9.1. List of Rights

If you are based in the EEA, under certain circumstances, you may have rights under data protection laws in relation to your personal data. These rights include:-

- **Right to request access to your personal data.** This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Right to request correction of the personal data that we hold about you.** This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Right to request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Right to object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms.** You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Right to request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Right to request the transfer of your personal data to you or to a third party.** We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Right to withdraw consent at any time where we are relying on consent to process your personal data.** However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us at [sales@lpm.hk](mailto:sales@lpm.hk)

## 1.2. No Fee Usually Required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.



### 1.3. Information Required

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### 1.4. Time Limit to Respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## 10. GLOSSARY

In this Privacy Policy, the following expressions shall have the following meanings except where the context otherwise required:-

“**External Third Parties**” shall mean (a) service providers based in Hong Kong who provide IT and system administration services; (b) professional advisors including lawyers, bankers, auditors and insurers based in Hong Kong who provide consultancy, banking, legal, insurance and accounting services; and (c) the Inland Revenue Department, regulators and other authorities based in Hong Kong who require reporting of processing activities in certain circumstances.

“**Legitimate Interests**” shall mean the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

“**Legal Obligations**” shall mean processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

“**Performance of Contract**” shall mean processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.