

## PRIVACY POLICY

Effective Date: 23/02/2023

This Privacy Policy explains how Trading Variety Limited, Company Registration No.: 3189980, Registered Office Address: Room 701, 7/F, Lucky Centre, 165-171 Wanchai Road, Wan Chai, Hong Kong, collects, uses, and discloses personal information from individuals who visit our website <https://varietytrad.com/>, use our services, or contact us. We are committed to protecting the privacy and security of your personal information and complying with the Personal Data (Privacy) Ordinance (Cap. 486) of Hong Kong and General Data Protection Regulation.

Data Controller:

Trading Variety Limited,

Company Registration No.: 3189980,

Registered Office Address: Room 701, 7/F, Lucky Centre, 165-171 Wanchai Road, Wan Chai, Hong Kong

## TERMS AND DEFINITIONS

**Personal Information:** Refers to any information that can be used to identify an individual, either on its own or in combination with other information.

**Processing:** Refers to any operation performed on personal information, including collection, storage, use, sharing, or deletion.

**Data Subject:** Refers to the individual to whom the personal information relates.

**Controller:** Refers to the organization or individual that determines the purposes and means of processing personal information.

**Processor:** Refers to the organization or individual that processes personal information on behalf of the controller.

**Consent:** Refers to the individual's freely given, specific, informed, and unambiguous agreement to the processing of their personal information.

**Cookies:** Refers to small text files that are placed on a user's device when they visit a website, which can be used to track their activity and personalize their experience.

**Third Party:** Refers to any organization or individual that is not the data subject, controller, or processor of the personal information being processed.

## DATA PROTECTION PRINCIPLES

We collect, process and handle personal information according to data protection principles:

- **Lawfulness, fairness, and transparency:** Personal data must be processed lawfully, fairly, and in a transparent manner.
- **Purpose limitation:** Personal data must be collected for specified, explicit, and legitimate purposes, and must not be further processed in a way that is incompatible with those purposes.
- **Data minimization:** Personal data must be adequate, relevant, and limited to what is necessary for the purposes for which it is processed.
- **Accuracy:** Personal data must be accurate and kept up-to-date, and any inaccurate data must be rectified or erased without delay.

- Storage limitation: Personal data must be kept in a form that permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed.
- Integrity and confidentiality: Personal data must be processed in a manner that ensures appropriate security, including protection against unauthorized or unlawful processing and against accidental loss, destruction, or damage.
- Accountability: The controller of personal data is responsible for ensuring that these principles are followed and must be able to demonstrate compliance with them.

#### COLLECTION OF PERSONAL INFORMATION

We may collect personal information about you when you visit our website, use our services, or communicate with us. The types of personal information we may collect include:

- Contact information (e.g., name, email address, phone number)
- Company information (e.g., company name, job title)
- Payment information (e.g., IBAN, debit or credit card number, billing address)
- Shipping information (e.g., shipping address, delivery instructions)
- Other information you provide to us (e.g., product information, feedback)

We may also collect information about your use of our website, such as your IP address, browser type, and operating system.

#### PURPOSES OF COLLECTION OF PERSONAL INFORMATION

We use the personal information we collect to:

- Provide and improve our services to you
- Process payments and fulfill orders
- Communicate with you about our services and promotions
- Respond to your inquiries and requests
- Analyze website usage and improve our website
- Comply with legal obligations
- We may also use your personal information for other purposes that are consistent with the purposes for which we collected it, or with your consent.

#### LEGAL BASIS OF PERSONAL INFORMATION PROCESSING

We ensure that there is a legal basis for our processing of personal information. We process your information on the following legal bases:

- Contractual necessity: when processing personal information is necessary for the performance of a contract or to take steps at the request of the individual prior to entering into a contract.
- Legal obligation: when processing personal information is necessary for compliance with a legal obligation, such as statutes, regulations, court orders.
- Legitimate interests: when processing personal information is necessary for our legitimate interests, provided that such interests are not overridden by the rights and freedoms of the individual.
- Consent: we obtain the individual's consent before collecting their personal information, and clearly explain the purposes for which it will be used.

#### DISCLOSURE OF PERSONAL INFORMATION

We may disclose your personal information to third parties for the following purposes:

- Service providers that perform services on our behalf (e.g., payment processing, shipping)
- Business partners that provide products or services that complement our services
- Law enforcement or government agencies, when required by law or to protect our rights and property
- Other parties with your consent

We take appropriate measures to ensure that any third-party service providers who receive your personal information comply with applicable privacy laws and regulations and maintain the confidentiality and security of your personal information.

We do not sell or rent your personal information to third parties.

## COOKIES AND OTHER TRACKING TECHNOLOGIES

We use cookies and other tracking technologies to improve our website and personalize your experience. Cookies are small text files that are stored on your device when you visit our website. We use both session cookies (which expire when you close your browser) and persistent cookies (which remain on your device until they expire or you delete them). You can control cookies through your browser settings, but disabling cookies may limit your ability to use certain features of our website.

We use the following types of cookies:

**Essential cookies:** These cookies are necessary for the website to function properly and cannot be turned off. They are usually set in response to actions taken by the user, such as logging in or completing a form.

**Performance cookies:** These cookies collect information about how users interact with the website, such as which pages they visit most often and whether they receive error messages. This information helps improve the website's performance and user experience.

**Functionality cookies:** These cookies allow the website to remember user preferences and settings, such as language preferences or font size. This helps personalize the user's experience on the website.

**Targeting or advertising cookies:** These cookies are used to deliver personalized advertisements to the user based on their browsing history and interests. They may also be used to limit the number of times an advertisement is shown to a user.

	Name	Type	Expiration time	Purpose of Use
Advertising Cookies	_utmz	Google Analytics	6 months	This cookie stores how the user reached our website, whether it is directly by introducing the domain address, via a link, a web search or an advert.
Advertising Cookies	_utma	Google Analytics	2 years	This cookie is used to identify unique visitors vs. returning visitors.
Advertising Cookies	_ga	Google Analytics	2 years	This cookie is used to distinguish unique users.
Essential Cookies	varietytrad _session	Cookies on the Website	session	This cookie allows remembering that the user has previously logged into the system.

Functionality cookies	XSRF-TOKEN	Cookies on the Website	session	This cookie ensures the security and functionality of the Website.
-----------------------	------------	------------------------	---------	--

## SECURITY

We use reasonable measures to protect your personal information from unauthorized access, use, or disclosure. However, no method of transmission over the internet or method of electronic storage is 100% secure. Therefore, we cannot guarantee the absolute security of your personal information.

## YOUR RIGHTS

Data subjects have several rights to protect their personal data:

1. Right of access: Data subjects have the right to access their personal data held by an organization, as well as information about how it is being used or processed.
2. Right to correction: Data subjects have the right to request correction of any inaccurate personal data held by an organization.
3. Right to erasure: Data subjects have the right to request the erasure of their personal data held by an organization, subject to certain exceptions.
4. Right to object to direct marketing: Data subjects have the right to object to the use of their personal data for direct marketing purposes.
5. Right to data portability: Data subjects have the right to request the transfer of their personal data to another organization, subject to certain conditions.
6. Right to withdraw consent: Data subjects have the right to withdraw their consent to the processing of their personal data at any time.
7. Right to complain: Data subjects have the right to lodge a complaint with the Office of the Privacy Commissioner for Personal Data if they believe their rights under the PDPO have been violated.

## RETENTION PERIOD

We will retain your personal information for as long as necessary to fulfill the purposes for which it was collected and to comply with applicable legal and regulatory requirements. We will also retain your personal information for as long as necessary to provide you with the services you have requested or to resolve disputes.

If we no longer need to retain your personal information for any reason, we will securely delete or destroy it in accordance with our data retention and destruction policies.

Please note that even after your personal information is deleted or destroyed, residual copies may remain in our backup systems and archives for a limited period of time.

If you would like more information about our data retention practices, please contact us using the information provided in the 'Contact Us' section of this Privacy Policy.

## CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time. The updated Privacy Policy will be posted on our website and will be effective as of the date of posting.

## CONTACT US

If you have any questions or concerns about this Privacy Policy or our collection, use, or disclosure of your personal information, please contact us at [info@varietytrad.com](mailto:info@varietytrad.com).

If you would like to exercise any of your data subject rights, please contact us at [info@varietytrad.com](mailto:info@varietytrad.com).