

Privacy Policy

This Privacy Policy Statement sets out how we collect, use, manage and protect the personal data or information (“Data”) that we may collect from or about you. It applies to all individuals whose Data may be handled, whether as controller or processor, by X Digi Park, its holding company Lagomgear Limited, and each of its parent companies, subsidiaries, affiliates and associated companies, including, without limitation, social media platforms under it (collectively “Lagomgear”, “we”, “us” or “our”). You shall read this Privacy Policy Statement carefully so as to ensure that you fully and clearly understand the contents herein.

Protecting your privacy

We are dedicated to processing your Data in accordance with the required standards. This includes protecting your privacy and ensuring the security of your Data in compliance with, where applicable, the requirements of the Personal Data (Privacy) Ordinance (Chapter 486 of the Laws of Hong Kong) (the “Ordinance”), Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (the “GDPR”) and other relevant regulations where applicable.

Before using and providing your Data for the purposes as set out in this Privacy Policy Statement, we may be required by law to obtain your written consent, and in such cases, only after having obtained such written consent may we use your Data in the manner as specified. If you are a minor or under 16 years old or a person who is mentally incapable, you must obtain express consent from your parents or guardian before providing any personal data to us. If you do not accept the following terms of this policy, please stop accessing, browsing or using this website/our e-services.

Your Data

We may collect, use and hold a range of different Data about you. For the purposes of carrying on our business (including the verification of your identity to detect, prevent and address fraud, security or technical issues (collectively, “Service(s)”) and complying with laws, rules, guidelines, regulations and/or requests issued by applicable government authorities, courts, law enforcement or other authorities or regulatory bodies, you may be requested to provide Data such as, but not limited to:

- (a) contact details including but not limited to name, address, phone number, mobile telephone number and/or email address, etc.;
- (b) Data that you have shared with third-party social media platform operators (e.g. account login name, profile picture, contact details), etc.;

- (c) device-specific information such as hardware model, operating system, version, unique device identifier, serial numbers, setting configurations and software and mobile network configuration;
- (d) information about how you use our Services, such as your network usage, how you use our network, and your location when you are using our Services;
- (e) all Data requested by applicable government authorities, courts, law enforcement or other authorities or regulatory bodies to enable us to comply with or in connection with any law, rule, regulation, judgment or court order (whether within or outside of Hong Kong); and
- (f) any other Data may be required by any members of Lagomgear and/or their respective contractors, sub-contractors, intermediaries, agents, business partners or representatives from time to time, which is necessary for the provision of the Services.
- (g) In some instances, where required by law to do so, we may seek your consent to process the following types of “Special Data” to us so that we may further improve our Services and/or better tailor the type of information or content that we present to you:
 - (i) age;
 - (ii) gender and ethnicity;
 - (iii) marital status;
 - (iv) Month of birth;
 - (v) education and profession;
 - (vi) monthly income range;
 - (vii) hobbies and leisure activities;
 - (viii) the Services that you have subscribed for; and
 - (ix) contact details, etc.

Provision of the Special Data mentioned immediately above is optional, although, where the requested Service is a personalised Service or provision of a product is dependent upon your provision of all requested Data, failure to provide the requested Data may prevent us from providing those particular Services to you.

How we collect Data

We collect Data in several ways, including from:

- (a) you directly, for example, when you provide Data by phone or via email, attend our functions, complete an application form or agreement for one of our Services, or when submitting your Data through our websites, mobile apps, or online chat sessions; or when you contact us with a query or request; or during the ordinary course of the continuation of our business relationship with you; or when we are legally required to do so;
- (b) third parties such as related entities, business partners, or other customers, or your representatives with appropriate consent from you;
- (c) publicly available sources;
- (d) our own records of how you use our Services;

- (e) your visits on our websites or mobile apps (see “Privacy Data” section below); and/or
- (f) your participation in surveys or marketing promotions organised by us or on our behalf, etc.

Participation in Promotional Activities

When participating in promotional activities organised by LAGOMGEAR or online media or co-organized by our business parties, users may not be required to be registered as our members but will be required to provide personal data for registration.

Privacy Data

To better serve your needs and preferences, our web servers may collect Data relating to your website, device or app activity. We may also collect aggregated, anonymous, statistical data on the server’s usage so that we may better cater to the behaviour of users of our websites and mobile apps. This type of Data may include, but is not limited to:

- (a) browser type, version and user agent;
- (b) operating system;
- (c) IP (Internet Protocol) address and/or domain name;
- (d) connection data, statistics on page views and/or referral URLs;
- (e) device ID, location and phone contacts;
- (f) videos watched or searched for;
- (g) links or images clicked on;
- (h) cookies and/or browser, app or web server log data; and
- (i) device and software characteristics and/or configuration.

Some of our websites may use cookies or similar tracking tools on your machine or device in order for us to, for example, personalise your user experience and/or maintain your identity across multiple webpages and/or Internet sessions. This Data may include, but is not limited to, relevant Data relating to your activities and the preference configurations on your device and across our websites and mobile apps. Our website may embed third-party features such as videos, maps and social media apps that provide you with a better browsing experience. Pages with these embedded features may present cookies from feature providers. We do not collect information from these cookies and do not control the dissemination of these cookies. These cookies or similar technologies are owned and controlled by third parties, and therefore the third parties – and not LAGOMGEAR – are responsible for their use. As such, we cannot guarantee that we have listed every cookie or similar technology you might get from a third party since a third party could change them at any time as their needs change. You should check the relevant third-party website for more information about these. Our websites may be set up to accept cookies. You can opt out of or delete historical cookies by changing the settings on your web browsers; however, if you do so, you may find that certain features on our website and/or our app do not work properly. (Note: Disabling the cookies function may cause

inaccessibility to some parts of our websites and thus you may not be able to enjoy our Services.)

Apart from that, as for any link or advertisement on our websites (if any), its owner may set or identify cookies on your browser. The use of cookies by third-party advertisers or advertising providers is not subject to this Privacy Policy but their respective privacy policies.

私隱政策

本私隱政策聲明涵蓋Lagomgear Limited、其擁有的X Digi Park、其附屬公司、聯營公司及關聯公司包括但不限於其社交媒體平台(統稱「Lagomgear」或「我們」)如何收集、使用、管理和保護我們可能向閣下收集或所收集到有關閣下的個人資料(「個人資料」)。請閣下詳細閱讀本私隱政策聲明並確保清楚及完全明白內容。

保障閣下的私隱

我們致力按照規定的標準處理閣下的資料，其中包括保障閣下的私隱及確保閣下個人資料的安全，以遵守(在適用情況下)香港特別行政區法例第 486 章《個人資料(私隱)條例》(「條例」)，以及歐洲議會和歐盟理事會在 2016 年 4 月 27 日通過有關個人資料處理及自由流動的個人資料保障的第 2016/679 號歐盟規則(「GDPR」，個人資料保護規則)(如適用)及其他相關法則。

為本私隱政策聲明列明之目的使用或提供閣下的個人資料前，我們可能會因法例規定需要索取閣下的書面同意。在此情況下，我們只會在取得閣下的同意後，才會開始按指定的方式使用閣下的個人資料。倘若閣下未成年或未滿16歲或為精神上無能力人士，在向我們提供任何個人資料前，必須先徵求家庭或監護人之明確同意。如閣下不願意接受下列條款的約束，請停止瀏覽或使用本網站/我們的電子服務。

閣下的個人資料

我們或會收集、使用及保留閣下各種個人資料。為了經營我們的業務(包括核實閣下的身份以偵查、預防及處理欺詐、保安或技術問題(如適用)(統稱「服務」))及遵從任何適用之政府相關部門、法院、執法或有關當局或監管機構所發佈的法律、規定、指引、規則及/或要求，閣下可能需要提供包括但不限於下列的個人資料：

- (a) 聯絡資料，包括但不限於閣下的姓名、地址、電話號碼、手提電話號碼及/或電郵地址等；
- (b) 閣下與第三方社交媒體平台經營商分享的個人資料(例如帳戶登入姓名、圖像、聯絡資料)等；
- (c) 裝置的具體資料，例如硬件模型、作業系統、版本、唯一識別碼、序號、設定配置以及軟件和流動網絡配置；
- (d) 有關閣下如何使用我們的服務的資料，例如閣下的網絡使用情況、閣下如何使用我們的網絡，以及閣下使用我們的服務時的位置；
- (e) 適用的政府相關部門、法院、執法或有關當局或監管機構所要求使我們能遵守任何法律、規定、規則、判決或法庭命令(不論是在香港境內或境外)或與此有關的所有個人資料；及
- (f) Lagomgear任何成員及/或其各自的承辦商、分包商、中介、代理商、商業夥伴或代表可能不時要求就提供服務而言為必需的任何其他個人資料。
- (g) 在某些情況下，如法律有所規定，我們可能會徵求閣下同意我們處理包括但不限於下列類別的「特別個人資料」，使我們能進一步改善服務及 / 或為閣下提供更適切的類別的資料或內容：
 - (i) 年齡；
 - (ii) 性別及種族；
 - (iii) 婚姻狀況；
 - (iv) 出生月份；
 - (v) 教育程度及專業資格；
 - (vi) 每月的收入範圍；
 - (vii) 嗜好及休閒活動；

- (viii) 閣下已申請的服務；
- (ix) 聯絡資料等。

閣下可選擇是否提供上述的特別個人資料。但當所需服務是個人化服務，或產品的提供是建基於閣下已提供一切所需個人資料，若閣下屆時未能提供所需的個人資料，可能會有礙我們向閣下提供該等特定服務。

我們如何收集個人資料

我們會通過不同的方式收集個人資料，包括：

- (a) 直接向閣下收集。例如閣下透過電話或電郵、出席我們的活動、填寫我們某項服務的申請表格或協議，或通過我們的網站、流動應用程式或網上聊天室提交閣下的個人資料，或當閣下聯絡我們提出查詢或要求時，或在日常商業事務中與我們保持聯繫期間，或當我們根據法規要求收集該等個人資料；
- (b) 經閣下同意後向第三方，例如相關的公司、業務合作夥伴、或其他客戶或閣下的代表收集；
- (c) 從公開資料來源收集；
- (d) 根據我們內部有關閣下如何使用我們的服務的記錄中收集；
- (e) 當閣下瀏覽我們的網站或流動應用程式(請參閱下述「私隱資料」)；及/或
- (f) 當閣下參與由我們或我們的代表舉行的調查或促銷活動等。

參加推廣宣傳活動

當參與由我們或與其他商業夥伴合辦的推廣宣傳活動時，用戶可能不需要註冊成為我們的會員，但我們會要求用戶提供個人資料進行登記。

私隱資料

為了更能滿足閣下的需要和喜好，我們的網頁伺服器會收集與閣下的網站、裝置或應用程式活動有關的個人資料。我們亦會收集伺服器使用量的不記名集體統計資料，使我們能更適當地回應我們網站及流動應用程式用戶的行為模式。這類個人資料可包括但不限於：

- (a) 瀏覽器類型、版本及用戶代理；
- (b) 操作系統；
- (c) IP(互聯網通訊協定)地址及/或網域名稱；
- (d) 連接數據、網頁瀏覽及/或推薦連結的統計數據及/或；
- (e) 裝置識別資料、位置及電話聯絡人；
- (f) 已觀看或搜尋的影片；
- (g) 已點擊的連結或圖像；
- (h) 「曲奇」(cookies)及/或瀏覽器、應用程式或網頁伺服器的日誌記錄；及
- (i) 裝置及軟件特性及/或配置等。

我們的網站可能會在閣下的電腦或裝置內使用「曲奇」(cookies)或類似的追蹤工具，以便我們(例如)為閣下提供個人化的服務及/或於閣下瀏覽不同網頁及/或互聯網期間進行身份識別。此等個人資料可包括但不限於有關閣下的裝置及閣下在我們網站及流動應用程式內的活動和喜好設定的個人資料。我們的網站可能內含嵌入式第三方功能如影像、地圖及社交媒體應用程式介面等，以提供更佳瀏覽體驗。具此等嵌入式功能的頁面或含功能供應商的「曲奇」(cookies)。我們不會從此等「曲奇」(cookies)收集資料，亦不會控制此等「曲奇」(cookies)將資料發佈。此等「曲奇」(cookies)或同類技術由第三方擁有並控制，因此該第三方而非我們須對其使用事宜負責。由於第三方可依其需要隨時變動其「曲奇」(cookies)，因此我們無法保證已將第三方所有「曲奇」(cookies)或同類技術列出。閣下應查閱相關第三方網站，以了解詳情。我們的網站在最初可能會設定為接受「曲奇」。閣下可以透過更改閣下網頁瀏覽器的設定選擇拒絕或刪除「曲奇」的歷史記錄；但是，閣下在更改有關設定後，可能無法如常使用我們網站及/或應用程式的某些功能。(請注意：取消Cookies功能後，閣下可能無法進入本網站的某些部分，以致無法享用我們提供的服務。)

此外，本網站上的連結或廣告(如有)，該連結或廣告的其他公司可能會在您的瀏覽器上設置Cookie或對其進行識別。第三方廣告商或廣告服務商對Cookie的使用不受本私隱政策的約束，但受他們各自私隱政策的約束。