

Privacy Policy and Personal Information Collection Statement

This Statement is, except where separate and distinctive statements are provided, applicable to "Luckys Workshop", "Lucky Web Host" and "多好運工作室" accordingly, references to "we", "us", or "our company" shall mean "Luckys Workshop", "Lucky Web Host" and "多好運工作室".

Please note that this Statement may be amended from time to time without prior notice. You are advised to check for the latest version on a regular basis. If there is any inconsistency or conflict between the English and Chinese versions of this Statement, the English version shall prevail.

1. Privacy Policy Statement

Our Pledge

We are committed to safeguard the privacy of individuals with respect to your personal data. We assure that our policies and practices, and those adopted by our affiliated companies and agents in relation to the collection, use, retention, disclosure, transfer, security and access of your personal data comply with the requirements under the Personal Data (Privacy) Ordinance (Chapter 486) (the "Ordinance") under the laws of Hong Kong, as well as the relevant code of practice and guidance issued by the Office of the Privacy Commissioner for Personal Data, Hong Kong. The meaning of the term "personal data" adopted in this Statement is defined in the Ordinance.

Where our operations are subject to privacy legislation other than that of Hong Kong (such as due to our carrying out of operational functions outside of Hong Kong), this Statement shall apply so far as it is consistent with such local legislation.

Collection of Personal Data

At times, you may be required to provide your personal data including, but not limited to, your name, gender, date of birth, identity document number and/or its copy, telephone number, fax number, home address and/or its proof, email address, credit card information, bank account number etc. Refusal to provide such information may render us unable to handle any application or request you are making, or may deny you access to certain parts of our websites, or may otherwise defeat the objectives of your visit. If you are under the age of 18, consent from your parent or guardian is required before you provide us with any personal data. Some of our websites may disclose non-personally identifiable aggregate statistics relating to our visitors to advertisers. Some of our websites may collect aggregate information about our visitors, e.g. statistics on the number of visits. This type of data may include, but is not limited to, the browser type and version, operating system, IP address and/or domain name.

When you visit our websites, we will record your visit only and will not collect any personal data from you unless otherwise stated. Cookies used (if any) in any part of our websites will not be deployed for collecting personal data. For your information, Cookies are small computer files that can be stored in web surfers' computers for the purposes of obtaining configuration information and analyzing web surfers' viewing habits. They can save you from registering again when re-visiting a website and are commonly used to track your preferences in relation to the subject matter of the website. You may refuse to accept Cookies by modifying the relevant Internet options or browsing preferences of your computer system, but to do so you may not be able to utilize or activate certain available functions in our websites. Our websites may bar users who do not accept Cookies.

Accuracy of Personal Data

Your application for our services may be subject to credit assessment and verification of your personal details. If we regard results of such checking is unsatisfactory, we will not enter into an agreement with you. Under certain circumstances, data provided by you will be validated by using generally accepted practice or against our pre-existing data, or we may require you to show the original documentation before the data may be used, such as personal identification document and/or proof of address.

Use of Personal Data Collected

Specific purposes for which your personal data may be used are set out in our "Personal Information Collection Statement" set out in Part 2 below.

Data Access and Correction

Under the Ordinance, you have the right to:

- I. Check whether we hold any of your personal data;
- II. Access your personal data held by us;
- III. Request us to correct any inaccurate personal data held by us; and
- IV. Ascertain our policies and practices established (from time to time) in relation to personal data and the types of personal data held by us. If you want to access and/or correct your personal data which you have given us via application form, internet or other means, or if you want to ascertain our policies and practices in relation to personal data and the kind of your personal data held by us, please contact our Data Protection Officer in writing, we will respond within 40 days after receiving the request. We may charge you a reasonable fee for each personal data access. However, such fee will be waived if the data access is made for the purpose of correcting your personal data.

Security of Personal Data

We use various encryption techniques to transmit via the Internet your personal data, which can

only be accessed by our authorized personnel. Given the operational nature of the Internet, we cannot guarantee that the transmission is fully secure. Please refer to our "Security Statement" in Part 3 below for details on the steps that we have taken to ensure that any personal data collected by us via our websites is safe and secure to avoid unauthorized interference by third parties

Internal Guidelines on Record Retention and Access to Personal Data

Our staffs are required to strictly adhere to our Internal Guidelines on Record Retention and Access to Personal Data. Physical records containing personal data are securely stored in locked areas when not in use. Access to such physical and/or computer records is strictly controlled and requires management approval for each access. Approvals for access to customers' personal data are granted only on a "need to know" basis. Where we retain, use and/or transmit customers' personal data, we have put in place adequate measures to protect it from accidental and/or unauthorized disclosure, modifications, loss and/or destruction.

Retention of personal data

If you are a customer of ours, your personal data which you have given us via application form, internet or other means, during the service subscription period will be retained for a reasonable period after termination of your subscription. We will erase any unnecessary personal data from our system in accordance with our internal policy.

2. Personal Information Collection Statement

As a customer of our company, or a visitor or user of our website(s), it may be necessary for you to provide us with your personal data when you apply to us and/or continue to subscribe with us for any service and/or product. If your personal data is incomplete or incorrect, we may not be able to provide or continue to provide the services to you. We shall keep your personal data confidential at all times. Our policies and practices with respect to the collection, use, retention, disclosure, transfer, security and access of personal data will be in accordance with requirements under the Ordinance and this Statement. We may use and retain the personal data provided by you for the following purposes and for other purposes as shall be agreed between you and us or required by law from time to time.

3. Security Statement

While internet is not an inherently secure environment for communications, security of internet communications can be enhanced by the application of appropriate technology. However, internet security is not solely a technical issue, knowledge on security of personal and transaction data as well as general measure are equally important. "Hackers" could only attack a system through a

"door". However, in most cases imprudent transmission and handling of sensitive data such as confidential documents, password, personal identifiers etc. would facilitate unauthorized access to such a "door" by "hackers". Hence, internet users should be cautious when handling such kind of sensitive documents and data.

In order to prudently preserve all personal data obtained from users of our websites, apart from firewalls and other sophisticated technical facilities, we also provide and maintain other stringent security measures so as to protect our system as well as the information and data retained therein from accidental or malicious destruction or damage.

4. Enquiries

Should you have any enquiries concerning this Statement, please feel free to contact us by the following address :

To: Luckys Workshop

Unit 2302, Flat 23, New World Tower, 18 Queen's Road Central, Central, Hong Kong