



## **Privacy and Use of Personal Data (The Privacy Policy)**

Your privacy and maintaining the confidentiality of your personal data is important to Cell-Wellbeing Limited ("**Cell-Wellbeing**", "**we**", "**our**", "**us**"). This privacy policy ("**Policy**") applies to all health related products and services provided by us and sets out how we may collect, use, disclose and protect your personal data. This Policy is governed by and observes the requirements of the Personal Data (Privacy) Ordinance (Cap. 486) (the "**Ordinance**").

### **Collection of your Personal Data**

We do not collect information about individuals, except where this is specifically stated and provided with your knowledge. We collect various types of personal data to enable us to provide you with Cell-Wellbeing products and services. We may ask you to supply personal data about you including, without limitation, your name, date of birth, address, telephone number, gender and email address.

We may also collect aggregate data that does not allow you to be identified. This data helps us understand your needs so that we can better adapt our services and products. We may share aggregate data about you with third parties, including for advertising or marketing purposes.

We may collect personal data from you in a range of ways including without limitation:

- when you complete an application form or another type of form in relation to our products and services;
- when you use our products and services;
- when you contact us in person, by phone, via mail, email or online;
- when you lodge a claim, complaint or any other document or form; and
- when you enrol in marketing activities/customer communications.

**If you do not provide us with the necessary information, we may not be able to provide you with certain products or services. For the avoidance of doubt, the provision of your email address, name, first initial and date of birth to us is necessary for the use of our products and services.**

### **Use and Disclosure of your Personal Data**

We use your personal data primarily:

- to provide, manage and administer our products and services to you, including without limitation, sending de-identified and anonymous personal data stored by us to our servers;
- to provide you with periodic reminders to obtain regular updates in relation to any services or reports in relation to your personalised information obtained from any of our products or services;
- to provide you with your personalised information;
- to provide you with customer service and respond to your requests;
- to enable us operate our business efficiently and sustainably;
- to improve marketing and promotional efforts and product and service offerings; and
- to provide you with information, materials and newsletters relating to our products, services or benefits, and third party health services and products, which we consider of potential benefit to you or your family.

In providing you with our products and services, we may disclose your personal data to other organizations or agencies that are contractually bound to handle your data in the same way we do. The circumstances where we may disclose your personal data to such third parties include:

- with any affiliates or associated companies (as defined in the Companies Ordinance (Cap.622) of Cell-Wellbeing (the “**Cell-Wellbeing Group**”) in connection with provision, management or administration of the products and services for you;
- with any other organization that helps us process transactions, store data, access data or provide services to you in order for them to perform their role, including but not limited to providing you with periodic reminders to obtain regular updates in relation to any services or reports in relation to your personalised information obtained from any of our products or services. Our business terms ensure that these contractors only use your personal data in connection with the purposes outlined above, and prohibit our contractors from using your personal data for their own purposes (including direct marketing);
- where laws require or allow us to provide information to a government agency, regulatory body or authorized authority;
- in connection with a merger, acquisition or sale of all or a substantial part of our business with or to another company; and
- where you have given your express consent.

**For the avoidance of doubt, our products and services require us to store de-identified and anonymous personal data in relation to you (the “Information”) and transfer such**

**Information our servers in Hamburg, Germany for mapping The Information is encrypted and does not contain any of your personal information identifiers. The Information (and the results of the Process) will only be linked to any of your personal information identifiers when the Information is transferred back to the device from our servers in Germany and the device decrypts the Information and the results of the process.**

### **Direct Marketing**

We will not sell your personal data to anyone. From time to time, we may use your name, address, email address, telephone number and fax number to contact you about our and Cell-Wellbeing Group's healthcare products and services, rewards, benefits, discounts, loyalty or privileges programmes and related services and products; and donations and contributions for charitable and/or non-profit making programme and/or activities.

If you do not wish to receive marketing material from us, please write to us at any time at: [privacy@cell-wellbeing.com](mailto:privacy@cell-wellbeing.com).

### **Security of your Personal Data**

We take reasonable steps to ensure your personal data is kept secure from unauthorized or accidental access, processing, erasure, loss, use or disclosure, including steps to ensure that it is stored correctly. In addition, access to your personal data will be restricted to those properly authorized to have access.

Even though we take steps to secure your personal data, you should be aware that no system is impenetrable and no information is completely secure. Accordingly, we cannot guarantee the security of information that you transmit or receive, or any information that is stored or retained by us. In particular, users are requested not to send highly confidential details or credit card numbers, for example, by email, unless specifically requested by Cell-Wellbeing.

We are unable to guarantee that third parties will not be able to independently gain access to confidential information or data (including without limitation payment details and your personal data) passing to or via our websites, our communication channels or our servers. Accordingly, we do not accept any responsibility or liability whatsoever for any loss or damage suffered or incurred by you as a result of any use or miss-use of any such confidential information or data by any such third party and you agree and acknowledge that your provision of your personal data to us shall be solely at your own risk.

### **Retention of Personal Data**

We keep your personal data for as long as it is required to provide you with the products and services you requested from us and to comply with the relevant legal and regulatory requirements. If we no longer require your personal data for any purpose, including legal purposes, we will take reasonable steps to securely delete or destroy our records of your personal data.

## **Our Websites**

This section only relates to any personal data collected online via our websites located at cell-wellbeing.com and business.cell-wellbeing.com

**Information Processing:** Your personal data will, if required, be processed by us in Hong Kong where data protection and privacy regulations may not offer the same level of protection as in other parts of the world, such as the United States or the European Union. By using our websites, you consent to the collection and/or processing in the Hong Kong of your personally identifiable information, which includes the use of cookies. By providing any personal data to our websites, all users, including without limitation users in the member states of the United States or the European Union, fully understand and unambiguously consent to the collection and processing of such information in the Hong Kong.

**Web Analytics:** We do collect information on a visitor's activity on our websites. This is commonly referred to as 'web analytics' information, which may include (but is not limited to) information such as where the visitor has come from (eg referring domains, search engines, marketing campaigns), the type of browser or operating system used to access our website, pages viewed, date and time of access, the site path of the visitor, which content visitors are clicking on, which products visitors are interested in and purchase.

**Cookies:** For each visitor to our websites, our web server automatically recognises and stores information, such as the visitor's IP address/domain name combination. Your computer provides such information automatically each time you log on, unless you have activated blocking technology available in some browsers. We may use cookies which store certain information on your computer which will allow us to customise your visit to our websites and for other purposes to make your visit more convenient and help us better tailor our website to your needs. Most browsers will allow you to erase cookies, from your computer hard drive, block acceptance of cookies, or receive a warning before a cookie is stored. However, if you block or erase cookies, we may not be able to restore any preferences or customisation settings you previously specified, and our ability to personalise your online experience would be limited.

**Personal Data:** We may ask you to provide personal or individually identifiable information, such as your e-mail address, name, mailing address, telephone number or persistent identifier (such as a customer number held in a cookie) which is associated with individually identifiable information, to enable you to fill out a registration, or to order products and services using our websites. If you choose not to provide your personal data, you may not be able to participate in certain activities.

**Generic Information Sharing:** We may share overall visitor trends and other generic information collected on our websites with third parties but we will not disclose any personal details or personally identifiable information without your specific consent.

**Third Party Websites:** Where we provide links to a third party website, we do not take any responsibility for or make any warranties, representations or undertakings about the content of any other website which may be referred to or accessed by hypertext links in,

from or with our websites, and we do not endorse or approve the content of such third party websites. We have no control over the content of the linked websites or the way in which the operators of those websites deal with your personal data. We encourage you to review the privacy policies applicable to these third party websites to understand the ways in which your personal data may be used by those third parties. Where any interactions between site users take place, we accept no responsibility for any harassment, annoyance or the transmission of any offensive, illegal or derogatory material(s) or for any other matters.

### **Access and Correction of Personal Data**

You have the right under the Ordinance to request access to and correction of any personal data that you provide to us. You may make such a request by writing to the Privacy Officer at: [privacy@cell-wellbeing.com](mailto:privacy@cell-wellbeing.com).

### **Consent from Minors and Mentally Incapacitated Persons**

This section only relates to any persons below the age of 18 (“**Minors**”) and persons who are incapable, by reason of mental incapacity, of managing and administering their property and affairs or persons suffering from mental illness, psychopathic disorders or having significant impaired intelligence (“**MIPs**”).

For any consent to be validly given in respect of any Minors or MIPs, we will require both (i) the consent of the relevant Minor or MIP; and (ii) the consent of the relevant Minor or MIP’s parent, guardian or a person appointed by a court with competent jurisdiction.

**We strongly recommend that Minors and MIPs do not use our products and services without sufficient and adequate supervision. Additionally, Minors and MIPs should not use any of our websites without sufficient and adequate supervision.**

### **Opt-out Procedures**

You can choose to receive marketing and other promotional materials by email and you may opt out from receiving these materials at any time. If at any time you would like us to stop sending you direct mailings, please contact our Privacy Officer in writing at: [privacy@cell-wellbeing.com](mailto:privacy@cell-wellbeing.com).

### **Governing Law and Jurisdiction**

This Policy is governed by and construed in accordance with laws of Hong Kong. Any disputes arising from this Policy shall be subject to the jurisdiction of the Hong Kong Courts.

### **Amendments**

We may from time to time update or amend this Policy and all information will be governed by our most recent Policy. Our most recent Policy will be available on our websites at [cell-wellbeing.com](http://cell-wellbeing.com) and [business.cell-wellbeing.com](http://business.cell-wellbeing.com).

