

## WEBSITE PRIVACY POLICY

(the "Privacy Policy")

Lifespans Limited is committed to protecting and respecting your privacy.

This Privacy Policy (together with any other documents referred to in it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

### 1. INFORMATION COLLECTION

- 1.1. In order to provide a better service to you, we may collect and process the following data about you:
  - 1.1.1. information that you provide by filling in forms on our websites (collectively "Sites"), such as [www.lifespans.net](http://www.lifespans.net) and [www.alfonso-cloud.com](http://www.alfonso-cloud.com). This includes information provided at the time of registering to use our Sites, subscribing to our services, posting material or requesting further services. We may also ask you for information at other times, for example in connection with a promotion or when you report a problem with our Sites;
  - 1.1.2. information provided or made available to us through your actions (such as when you interact on social media or register or attend a Lifespans or third-party event);
  - 1.1.3. if you contact us, we may keep a record of that correspondence;
  - 1.1.4. we may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them;
  - 1.1.5. details of transactions you carry out through our Sites and of the fulfillment of your orders;
  - 1.1.6. details of your visits to our Sites and the resources that you access.
- 1.2. We only retain personal data for so long as it is necessary. Data may be archived as long as the purpose for which the data was used still exists.
- 1.3. By visiting the Sites or by using our services, you acknowledge the practices described in this Privacy Policy.

### 2. USES MADE OF THE INFORMATION

- 2.1. The purposes for which information may be used by us in and outside the Hong Kong Special Administrative Region include:
  - 2.1.1. ensuring that content from our Sites are presented in the most effective manner for you and for your computer;
  - 2.1.2. providing you with alerts, newsletter, education materials or information that you requested or signed up to;
  - 2.1.3. carrying out our obligations arising from any contracts entered into between you and us;

- 2.1.4. allowing you to participate in interactive features of our service, when you choose to do so;
  - 2.1.5. designing and conducting surveys/questionnaires for client profiling/segmentation, statistical analysis, improving and furthering the provision our products and services;
  - 2.1.6. complying with laws and regulations applicable to us or any of our affiliates in or outside the Hong Kong Special Administrative Region;
  - 2.1.7. legal proceedings, including collecting overdue amounts and seeking professional advices;
  - 2.1.8. researching, designing and launching services or products including seminars/events/forums;
  - 2.1.9. promoting and marketing services and products subject to your exercise of the opt-out right (please see further details in Clause 8.3); or
  - 2.1.10. purposes directly related or incidental to the above.
- 2.2. We may use your data in direct marketing and we require your consent (which includes an indication of no objection) for that purpose. In this connection, please note that:
- 2.2.1. your name, contact details (including address, contact number, email address), products and services information, transaction pattern and behavior, background and demographic data held by us from time to time may be used by us in direct marketing;
  - 2.2.2. the following classes of services, products and subjects may be marketed in direct marketing:
    - 2.2.2.1. services and products related to our Sites and/or our affiliates (including marketing affiliates programs we are a part of);
    - 2.2.2.2. reward, loyalty or privileges programs, promotional offers and related services; and
    - 2.2.2.3. invitations to events such as seminars/webinars/tele-seminars, conferences, live programs or events.
  - 2.2.3. We may conduct direct marketing via email, direct mail, telephone and other means of communication or send e-newsletters to you. You may choose not to receive promotional materials, by simply telling us (see Clause 8.3 for contact details), and we will cease to do so, without charge.

### 3. DISCLOSURE OF YOUR INFORMATION

We will keep the personal data we hold confidential, but may provide information to:

- 3.1. personnel, agents, advisors, auditors, contractors, financial institutions and service providers in connection with our operations or services;
- 3.2. our overseas offices, affiliates, business partners and counterparts (if any); persons under a duty of confidentiality to us;

- 3.3. persons to whom we are required to make disclosure under applicable laws and regulations in or outside the Hong Kong Special Administrative Region; or
- 3.4. actual or proposed transferees or participants of our services in or outside the Hong Kong Special Administrative Region.

#### 4. SECURITY

- 4.1. In considering the types of data we collect and the data activities we undertake in delivering the Sites and our services, we have implemented reasonable and appropriate physical, technical and organizational measures to guard against unauthorized or unlawful access to your personal data. While no system is completely secure, we believe our measures reduce potential vulnerability to a level appropriate to the types of data processed.
- 4.2. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Sites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.
- 4.3. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Sites; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

#### 5. COOKIES AND SIMILAR TECHNOLOGIES

- 5.1. In order to improve your browsing experience, we uses cookies or other similar technologies that may process your personal data.
- 5.2. Depending on the websites or services, we use different types of cookies:
  - 5.2.1. Essential cookies are necessary for our websites to work as intended.
  - 5.2.2. Functional cookies enable enhanced functionality. Without these cookies, certain functions may become unavailable.
  - 5.2.3. Analytics cookies provide statistical information on site usage.
  - 5.2.4. Advertising cookies may be implemented by us or third parties to create profiles or personalize content to enhance your experience. They do not directly store personal data, but are based on the unique identification of your browser and internet device.
- 5.3. It is possible to disable cookies through your device or browser settings, but doing so may affect your ability to use our website. The method for disabling cookies may vary by device and browser, but can usually be found in preferences or security settings.

#### 6. CHANGES TO OUR PRIVACY POLICY

Any changes we may make to our Privacy Policy in the future will be posted on this page.

#### 7. DATA TRANSFERS

We may hold your data on our servers or on the servers of our service providers in Hong Kong and any other territories as we see fit from time to time. We may also transfer your data to our overseas offices or to any people listed in Clause 3 above, who may be located in or outside of the Hong Kong Special Administrative Region.

## 8. YOUR CONSENT AND RIGHTS

- 8.1. By using our services, registering an account or visiting our websites, you consent to the collection and use of your information and other activities as outlined in this Privacy Policy.
- 8.2. Under the Hong Kong Personal Data (Privacy) Ordinance ("Ordinance"), individuals have the right:
  - 8.2.1. to check whether we hold personal data about you and to access such data;
  - 8.2.2. to require us to correct as soon as reasonably practicable any data relating to you that is inaccurate;
  - 8.2.3. to ascertain our policies and practices in relation to personal data and the kind of personal data held by us; and
  - 8.2.4. to object to the use of your personal data for marketing purposes and we shall not use your personal data for marketing purposes after you communicate your objection to us.
- 8.3. You may exercise your opt-out right by notifying us if you wish to object to the use of your personal data for direct marketing purposes. Please send requests for such objections, access to data, correction of data, information regarding policies and practices and kinds of data held, questions or complaints to:  
  
Lifespans Limited  
info@lifespans.net
- 8.4. In accordance with the terms of the Ordinance, we have the right to and may charge a reasonable fee for processing any data access request.
- 8.5. In the event that you wish to access or amend your personal information and data, we may request that you provide personal details in order to verify and confirm your identity. We are required to respond to your request within three hundred (300) days of your request and will endeavor to do so wherever possible.

## 9. GOVERNING LAW AND JURISDICTION

Nothing in this Privacy Policy shall limit the rights of the data subject under the Ordinance. This Privacy Policy shall be governed by the laws of the Hong Kong Special Administrative Region. You agree to submit to the exclusive jurisdiction of the Hong Kong courts.

Contact us at [info@lifespans.net](mailto:info@lifespans.net) if you have questions about this Privacy Policy.

This Privacy Policy was last updated on April 27, 2023.