

#### PRIVACY POLICY

FRINGEBACKER LIMITED ("FRINGEBACKER", "WE", "US", "OUR") OWNS AND OPERATES FRINGEBACKER. WE RECOGNISE THE IMPORTANCE OF YOUR PRIVACY AND MAINTAINING THE CONFIDENTIALITY OF YOUR PERSONAL INFORMATION. THIS PRIVACY POLICY APPLIES TO ALL PRODUCTS AND SERVICES PROVIDED BY US AND SETS OUT HOW WE MAY COLLECT, USE AND DISCLOSE YOUR PERSONAL INFORMATION. THIS PRIVACY POLICY IS GOVERNED BY AND OBSERVES THE REQUIREMENTS OF THE PERSONAL DATA (PRIVACY) ORDINANCE (CAP. 486) (THE "ORDINANCE").

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

- 1. Your privacy is important to us and we have taken steps to ensure that we do not collect more information from you than is necessary for us to provide you with our services and to protect your account.
- We may ask you to provide personal information when you use our website and services, including when you enter into transactions on our website
  or enrol for certain programmes ("Programmes"). The data that we may ask you to supply includes without limitation salutation, name, day and
  month of birth, telephone number, email address and residential address ("Personal Data").
- 3. Please note that it is mandatory for you to provide certain categories of Personal Data (as specified at the time of collection). In the event that you do not provide any Personal Data marked as mandatory, we may not be able to provide you with products or services or rewards (including registering you for our Programmes).

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

- 4. If you provide any personal data to us, you are deemed to have authorised us to collect, retain and use personal information about you for the following purposes:
  - processing your use of FringeBacker and your Programmes and maintaining and managing your relationship with FringeBacker;
  - verifying your identity;
  - verifying your eligibility to make use of FringeBacker and to participate in our Programmes;
  - providing you with products, services and other rewards, or anything else under any of our Programmes or any other activity conducted by FringeBacker to offer you better customer service;
  - providing you with customer service and responding to your queries, feedback or claims;
  - performing research or statistical analysis in order to improve our products and services and for marketing and promotional purposes;
  - providing you with a log-in ID for our website; and;
  - making such disclosures as may be required for any of the above purposes or as required by law or in respect of any feedback or claims made by you.
- 5. You further agree that we may disclose and transfer (whether in Hong Kong or abroad) your Personal Data to third party services providers engaged by us to assist with providing you with our services (including data entry, managing our customer database, contacting you regarding promotions, products, rewards, vouchers and redemption letters and customer service) and securely disposing of your Personal Data ("Third Party Service Providers"). These Third Party Service providers are under a duty of confidentiality to us and are only permitted to use your Personal Data in connection with the purposes specified at Clause 4 above, and not for their own purposes (including direct marketing).
- 6. When necessary we may also disclose and transfer (whether in Hong Kong or abroad) your Personal Data to our professional advisers, law enforcement agencies, insurers, government and regulatory and other organisations for purposes specified at Clause 4 above.
- 7. We may use your name, phone number, address and email address ("Marketing Data") to provide marketing materials to you relating to Programmes and goods/services/rewards, including goods and services provided at (a) FringeBacker; (b) goods and services offered by FringeBacker's affiliates; and (c) goods and services offered by FringeBacker's partners. Such goods and services for each of the foregoing may include those related to art, charities, crowdfunding, culture, design, development, education, film, fashion, food, fundraising, games, music, performance, publishing, social causes, science, sports, and technology ("Marketing Materials").
- 8. We may share aggregate data that does not allow you to be identified with third parties for various purposes (including marketing and advertising), and may use this data in order to better understand your needs and to improve and adapt our products and services.
- 9. Any personal information supplied by you will be retained by us and will be accessible by our employees, any Third Party Service Providers engaged by us and third parties referred to at Clause 6 above, for or in relation to any of the purposes stated in Clause 4 herein.

## Confidentiality

- 10. Personal Data held by us relating to our online customers or to visitors to our websites will be kept confidential in accordance with this Privacy Policy.
- 11. Any questions, comments, suggestions or information other than Personal Data sent or posted to the site, or any part of the site, by visitors will be deemed voluntarily provided to us on a non-confidential and non-proprietary basis. We reserve the right to use, reproduce, disclose, transmit, publish,

broadcast and/or post elsewhere such information freely, including passing it to any associated company for example, in connection with the development, manufacture and marketing of products and services and rewards and to meet customer needs.

### **Safety of Personal Data**

- 12. All reasonable efforts are made to ensure that any personal data held by us is stored in a secure and safe place, and accessed only by our authorised employees or authorised Third Party Service Providers.
- 13. You should be aware that no system is impenetrable and no information provided over the Internet can be guaranteed to be completely secure.

  Accordingly, we cannot guarantee the security of any information that you transmit to us or receive from us over the Internet.

## Links

14. This site may contain links to other sites and pages which are operated by third parties. 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. You should review the privacy policy for those third party websites to understand the ways in which your Personal Data may be used by those third parties.

## Information Collected When You Use Our Website

- 15. We may use 'cookies' on this site in order to:
  - enable tighter security
  - enable online customers to keep browsing
  - personalise sites for customers
  - build online customer or visitor profiles
- 16. Cookies are pieces of information stored in your hard-drive about your preferences on our site, which enable the site to be tailored to you in future visits. Customers who want to disallow cookies can do so on their web browser. However, by disabling cookies you may not be able to access all parts of our website.

# **Right to Access/ Correct Personal Data**

- 17. Under the Ordinance, you have the right of access to personal information held by us and to request correction of the information.
- 18. If you have any questions regarding this Privacy Policy or if you wish to access or correct your Personal Data, you may send your request by email: to cs@fringebacker.com or in writing to the following address:

Personal Data Officer FringeBacker 17A, EGL Tower 83 Hung To Road Kowloon, Hong Kong

19. In accordance with the Ordinance, we reserve the right to charge you a reasonable fee for the processing of any data access or correction request.

## **Amendments**

20. We may amend or update this Privacy Policy from time to time and all information will be governed by our most recent Privacy Policy, available on our website at www.fringebacker.com

If there is any inconsistency between the English and other language versions of this Privacy Policy, the English version shall prevail.

Updated: 18 November 2013