

## Privacy Policy Statement

Updated on February 26, 2019

### Definitions

In this Privacy Policy Statement:

“LKKHPG” refers to “LKK Health Products Group Limited and its related companies”.

“Website” refers to “www.happinesscapital.com”.

“www.happinesscapital.com”, “this Site”, “LKKHPG” and “we” can be used interchangeably.

“User” and “you” refers to the person(s) or organization(s) that accesses or uses this Website.

“Business Partner(s)” and “Partner(s)” refer to other companies that have business connections with the Website.

### I. Personal Data Protection

1. LKKHPG (‘us’, ‘we’, ‘our’) respects and is committed to protecting your privacy by complying with the requirements of the Personal Data (Privacy) Ordinance (Cap.486) (“PDPO”) of the Hong Kong Special Administrative Region (“HKSAR”). We make every effort to ensure that all our employees and Partners observe and comply with this Privacy Policy. For more information about this Ordinance, please visit the official website of the Office of the Privacy Commission (<http://www.pcpd.org.hk>).
2. LKKHPG shall not disclosure or sell any non-public information involving personal data, including but not limited to customer lists, browsing history, transaction records and other non-public information you have stored in the Website, to any third party, save and except:-
  - i. LKKHPG has obtained your consent;
  - ii. For the purpose of complying with the laws of the HKSAR or any other competent jurisdictions; or
  - iii. For the purpose of performing any agreement with you.

### II. Collection of Personal Data

1. LKKHPG and its agents may collect and keep certain categories of personal data, including the following:-
  - (a) Name;

- (b) Other information, including e-mail address, telephone number, company, etc.;
  - (c) Your browsing and interaction results and records in the Website;
  - (d) Inquiries, suggestions or opinions; and
  - (e) The computer operating system and information of the Internet service providers.
2. In order for LKKHPG to provide better service to User, LKKHPG and its agents shall collect, integrate, analyze and utilize the personal information when User voluntarily uses the service or provides the same. We use cookies. When User uses LKKHPG's service, the server shall automatically record certain information, including but not limited to, URL, IP address, browser type, language and date and time. You may refuse the use of cookies at any time by selecting the appropriate settings on your browser. However, it may affect your use and experience of our Website. By continuing to use this Website, you agree to the use of these cookies. For more details, please visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

### **III. Use of Personal Data**

1. The personal data that we collect from or provided by you may be used for one or more of the following purposes (and subject to your prior consent (which includes indication of no objection) in certain circumstances):-
- (a) To publish information related to our products, services, activities, competitions, promotions and projects;
  - (b) To use in publication(s) for non-commercial and commercial purposes;
  - (c) To respond to your queries;
  - (d) To collect statistical data for analysis and provide anonymous report to internal and external party for analysis (which may involve cross-border data transfer);
  - (e) To conduct investigations in relation to services;
  - (f) To assess the quality of services provided for further improvement; or
  - (g) To achieve the purpose directly related to any of the purposes described above.
2. The provision of personal data is entirely voluntary. If you do not want us to use your personal data for the purposes as described above, you may notify us by e-mail at [info@happinescapital.com](mailto:info@happinescapital.com) at any time to exercise your right to cease such use.

### **IV. Data Security**

1. We will make every effort to protect User's data through provision of guidance, utilization of technology and programs. Your personal data will be accessed by LKKHPG or its agents on a need-to-know basis to a limited extent and only when it is necessary to provide services to you.
2. We will retain your personal data only for so long as is necessary for fulfilling the purpose for which they were collected. Your personal data will be removed after legally allowed.

#### **V. Data Transfer Declaration**

1. For the purposes stated hereinabove, the personal data will be provided, transferred or disclosed to any of the following parties within or outside Hong Kong:-
  - (a) our Partners;
  - (b) the person(s) who assists us in implementation of this Privacy Policy Statement;
  - (c) persons or companies who are bound by our confidentiality agreement; and
  - (d) person(s) to whom we are responsible for disclosing the data pursuant to applicable law.

#### **VI. The Access, Correction or Deletion of Personal Data**

1. You have the right to access and correct your personal data kept by us. Please also ensure the accuracy of the data you provide to us as it may be used for identity verification. If you would like to inquire about, access to, make copy of, supplement or correct, cease our use of, or to delete your personal data, please contact LKKHPG at email: [info@happinesscapital.com](mailto:info@happinesscapital.com).

#### **VII. Regarding to Other Websites**

1. When you click on links to other websites or advertisements, you will enter or will be redirected to the website of third party or our affiliates and you will then be subject to the privacy policy of such website. We are not responsible for any incident outside of the Website.

#### **VIII. Legislation Protection**

1. This Statement does not restrict your rights under the PDPO.

#### **IX. Revision of this Privacy Policy**

1. We will revise our Privacy Policy Statement from time to time, and we will announce such revision on the Website forthwith. If you have any questions about our Privacy Policy Statement, please contact us via our email at [info@happinesscapital.com](mailto:info@happinesscapital.com).

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