



PRIVACY POLICY

Altfield Enterprises Limited is committed to protecting and respecting your data privacy and your right to fair and just processing of your personal data ensuring, when you choose to provide us with data about yourself it is secure and protected and that Altfield Enterprises Limited will act in a responsible manner.

This Privacy notice sets out the basis on which your personal data will be processed and treated by Altfield Enterprises Limited, the data controller of your personal data. Please read the following carefully to understand our views and practices.

This notice does not form part of any contract of employment or other contract to provide services. We may update this notice at any time.

In this policy, “we”, “us” and “our” refer to Altfield Enterprises Limited.

In this Privacy Policy, your “personal data” means any information or pieces of information that identifies you directly or indirectly, without limitation, by reference of your name, email address, login ID and other contact or location data or to one of more factors specific to your physical, physiological, genetic, mental, economic, cultural or social identity, that you voluntarily transmit to us.

We may collect the following types of Personal Data:

- Device information; includes details such as what kind of browser used, the operating system, their IP address, cookie information, time stamp (time page accessed as well as time spent per web page) and their click through information (pages viewed had the time spent therein).
- Where our use of your information is for the purposes of legitimate interests, once we have ensured that your rights in relation to that information are protected.
- Where we believe it is necessary to use your information to comply with a legal obligation.
- When we request you to complete a trade registration form when opening an account on our website. We may ask for Personal Data to be entered as means of registration before accessing certain sections of the webpage. Visitors are under no obligation to enter any of their personal data, however the information will be required in order to provide our content and services.
- We may also collect personal data when you use Altfield Enterprises Limited services such as placing an order or making an enquiry.
- Where we have your consent. We rely on your consent:
 - To use your information for marketing by email and other methods of electronic communication from time to time in accordance with your data preferences.

Where we rely on consent to use your information, you have the right to withdraw that consent at any time. Please see the “Your choices and rights” section of this policy for more details.

What we use Personal Data for

- To allow us to verify your username and password when logging on to restricted areas of our webpage.
- To register you to use Altfield services.
- To contact you to provide information you have requested.
- Any other processing necessary to fulfil a contract with you in connection with our legitimate interest to provide our services to you in an



PRIVACY POLICY

efficient, secure and personalised manner.

- To send you marketing communications, alerts and newsletters through our marketing channels, subject to your consent or otherwise permitted by law, in connection with our legitimate interest to provide information on products that you request from us or that we feel may be of interest to you. This may include important changes to the website or changes to existing services.
- To develop our content and general administration based on our users interests and our services.

Altfield Enterprises Limited may process information that will be maintained, used and disclosed in aggregate form only, without limitations to determine:

- The total number of visitors to the site.
- The number of visitors to each page.
- The browser type, any linked external websites and IP addresses.

Altfield Enterprises Limited may analyse this data for trends and statistics in the aggregate and may use such information to administer the website, track users' movement and gather broad demographic information.

Altfield Enterprises Limited may also use your information for our legitimate interest to:

- Ensure the security of your user account and our business.
- To prevent or detect fraud or abuse of the website, products or services.
- To implement and enforce our Terms and Conditions or any other business agreements concluded with your company.
- To administer technical aspects of our website including trouble shooting , diagnosis of technical and service problems, testing, encryption and similar operations.

Who will we share your information with:

We may share your information with the following parties:

- Our outsourcing partners and suppliers. All of our service providers are required to maintain the confidentiality and security of your personal information and to use it only in compliance with applicable data privacy laws and are prohibited from using or disclosing your personal information for any purpose other than providing their services on our behalf or as otherwise required by applicable law.
- Third parties. We will only disclose your personal data to third parties under the following conditions;
 - If we are required to disclose or share your personal data in order to comply with any legal obligation or in order to enforce or apply our terms and conditions or any other agreements. To protect the rights, property or safety of Altfield Enterprises Limited, our customers and organisations for the protection against credit risk and fraud.
 - If Altfield Enterprises Limited or substantially all of its assets are acquired by a third party. Personal data held about our customers will be one of the transferred assets



PRIVACY POLICY

- With your specific consent at either the point of registration or subsequently.

We will not disclose personal data with anyone else with the exception of the above conditions.

The period for which we will retain your information

We will keep your personal data for as long as is necessary for us to fulfil the purposes set out above or for as long as you are an Altfeld customer.

Otherwise personal data will only be retained if their retention can be justified for statutory, regulatory, legal or security reasons or for their historic value. Altfeld Enterprises Limited may keep an anonymous form of your personal data, which will no longer refer to you, for statistical purposes without time limits to the extent that there is a legitimate and legal reason to do so.

Your choices and rights

Our website contains links to external websites or affiliate websites. If you follow one of these links the website will be covered by their own Privacy Notice and personal data collection statement. Altfeld Enterprises Limited does not accept any responsibility or liability for the protection of personal data which you may submit to a third party website. We recommend that you check the wording of the privacy notices before submitting any personal data.

Subject to certain provisions, you have a number of general rights in relation to your personal data and can make choices about how we collect and use it.

You have the right to:

- To be informed as to how your personal data is being used.
- Request access to the personal data held for you.
- Withdraw consent or opt out of receiving direct marketing communication.
- Request the correction of inaccurate personal data.
- Request the erasure or restriction of use of your personal data.
- Object to processing activities including profiling activities.
- Contest a decision made regarding an automated process which significantly affects you.
- Receive your personal data in an appropriate electronic format.
- Unsubscribe from marketing communications. Altfeld Enterprises Limited recommends that the "Unsubscribe" link in the marketing communication is used. Alternatively contact us at marketing@altfield.com.hk

If you are concerned about how your information is used please contact:

Business Manager, Altfeld Enterprises Limited, 1101, Nine Queen's Road Central, Hong Kong