



## PERSONAL INFORMATION COLLECTION STATEMENT

### 1. General Statement

This Personal Information Collection Statement (“**PICS**”) outlines how ML Cloud Limited (“we”, “us”, “our”, “ML Cloud”, “Company”) collects, uses, processes and transfers your personal data. **Personal Data** means information which relates to a living individual and can be used to identify that individual. It must also exist in a form which access to or processing of is practicable.

By submitting your personal data to us, you agree to be bound by this PICS. Supply of your personal data to Company is non-obligatory, but failure to do so may result in Company being unable to give you access to account on the website <https://ml.cloud/> and provide you with the relevant services or information. As a customer of our company, or a visitor or user of our website(s), it may be necessary for you to provide us with your personal data when you apply to us and/or continue to subscribe with us for any products and/or services, or participate in any business collaboration program launched by us. If your personal data is incomplete or incorrect, we may not be able to provide or continue to provide the services to you or to allow you to participate in any business collaboration program launched by us.

We cannot use your personal data unless we have received your consent or indication of no objection (if you do not tick check-box during registration). If you are under the age of 18, please consult your parents or legal guardian(s) on the contents of this PICS, and ensure that you understand the matters set out in this PICS before giving your consent to this PICS and providing your personal data to ML Cloud.

We shall keep your personal data confidential at all times. Our policies and practices with respect to the collection, use, retention, disclosure, transfer, security and access of personal data will be in accordance with requirements under the Personal Data (Privacy) Ordinance (Chapter 486 of the Laws of Hong Kong SAR) (the “Ordinance”, “PDPO”) and this Statement.

### 2. Purposes for Collection of Personal Data

The personal data you provide to us may be used for the following purposes or any directly-related purposes and for other purposes as shall be agreed between you and us or required by law from time to time:

- ✓ processing and assessing applications for services of Company, including verifying the identity of applicants, assessing their suitability and collecting statistical information relating to the applicants;
- ✓ processing of your application for any business collaboration/affiliate program launched by us;
- ✓ recruitment and human resource management including processing of your online job (vacancy) applications;
- ✓ creating your account as a Customer;
- ✓ identification of the Customer in the user account for the provision of Services to him;
- ✓ managing your Customer Account (Customer Identity and Access);
- ✓ processing Customer purchase orders;
- ✓ providing Services to the Customer (Agreement implementation and enforcement);

- ✓ sending notifications to the Customer regarding the Services provided;
- ✓ processing of any benefits for you arising out of the Services and carrying out market research to enhance service quality or experience;
- ✓ communication with the Customer, responding to inquiries or expression of interest;
- ✓ performing administration work related to the operations of Company;
- ✓ to the extent that you have not "opted out", for promotion or direct marketing purposes (we may dispatch to you the promotional information via direct marketing telephone calls, e-mail, e-message<sup>1</sup>, etc.);
- ✓ sending newsletters or materials regarding events/goods/services/programs/advertising campaign of Company;
- ✓ analyzing, verifying and/or checking of your credit, payment and/or account status in relation to the provision of the Services;
- ✓ processing payments, such as issue of acknowledgement, receipts, payment collection notices, balance records;
- ✓ processing of any payment instructions, direct debit facilities and/or credit facilities requested by you;
- ✓ monitoring use of website to help its further development;
- ✓ complying with the requirements to make disclosures under the requirements of any law;
- ✓ enabling us to perform any obligations on interconnection or conform with other industry practices, or to comply with any requests stipulated by governmental or regulatory authorities (meeting any obligations of Company, or in connection with (a) any law, regulation, judgment, court order, sanctions regime, within or outside Hong Kong; (b) any guidelines, demand or requests given or issued by any legal, regulatory, governmental, tax, law enforcement or other authorities within or outside Hong Kong; or (c) any of the rules or bye-laws of Company relating to its operations);
- ✓ enabling us in prevention, detection or investigation of crime; and
- ✓ implementing any other purposes relating to the above.

The information collected by means of Cookies<sup>2</sup> on this website about you will be used only for compiling aggregate statistics on how visitors browse the website. Such statistics are collected to analyze site usage or aggregated consumer behavior (marketing intentions) for the purpose of managing and improving the design of the website. More information of Cookies

We may also from time to time use non-identifying information, which we collect to promote and/or improve services we offer which will not particularly identify any individual.

### **3. Automated Data Collection and Cookies**

We use Cookies and other tracking mechanisms, including those designed for mobile applications, to track information about your use of our website. We may combine this information with other personal information we collect from you.

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<sup>1</sup> E-message means electronic messages delivered via the following means: mobile short messaging service (SMS) / multimedia messaging services (MMS) / cross-platform mobile messaging application (e.g. smartphone messaging application).

<sup>2</sup> A cookie is a piece of data (small text files, alphanumeric identifiers) stored on a user's hard drive through web browser containing information about that user for record-keeping purposes. By setting a cookie on our website, the user would not have to log in with a password more than once, thereby saving time while on our website. If a user rejects the cookie, they may still use our website.

We may use clear GIFs (a.k.a. web beacons, web bugs or pixel tags), in connection with our website to, among other things, track the activities of website visitors and users, help us manage content, and compile statistics about website usage. Clear GIFs are tiny graphics with a unique identifier, similar in function to cookies. In contrast to cookies, which are stored on your device's hard drive, clear GIFs are embedded invisibly on web pages. We and our third-party service providers also use clear GIFs in HTML emails to our customers, to help us track email response rates, identify when our emails are viewed, and track whether our emails are forwarded.

For the purpose of handling security incidents, the website automatically stores a log file of the non-personal data, which your browser sends when visiting the page, specifically:

- ✓ IP address,
- ✓ browser type and version,
- ✓ operating system,
- ✓ website areas you've accessed,
- ✓ referrer URL (the page, from which this page was linked, including the search term, in case of a search engine),
- ✓ technical information related to the techniques you have used to access the website,
- ✓ time and date of the request.

The information generated about your use of the website (including your IP address anonymized prior to its storage) will be stored. You may refuse the use of tracking cookies by selecting the appropriate settings in your browser.

ML Cloud website uses Google Analytics and Yandex.Metrica, a web analytics open-source software by Google LLC (the USA) and Yandex LLC (Russia). We also may use other analytic means to evaluate our website. We use these tools to help us improve our services, performance, and user experiences. These programs may use some tracking technologies and Cookies to help the website analyses how users use the site: to analyze trends, administer the website, track users' movements, and gather broad demographic information for aggregate use. These third parties (analytics tracking system providers) track and gather information about website visitors, and may use the data collected by the cookies.

To learn more about Yandex's privacy practices, please review the Yandex.Metrica Privacy Policy at <https://metrica.yandex.com/about/info/privacy-policy>. To learn more about Google's privacy practices, please review the Google Policy at <https://www.google.com/policies/privacy/>. You can also download the Google Analytics Opt-out Browser Add-on to prevent their data from being used by Google Analytics at <https://tools.google.com/dlpage/gaoptout>.

Most web browsers automatically accept cookies, but if you prefer, you can edit your browser options to block them in the future. You can choose to 'not accept' cookies by changing the settings but if you do so you may find that certain features on the website do not function properly. The only drawback to this is that the user will be limited in some areas of our website. If you decide that you don't want to allow the use of cookies while you're using our website, please refer to the information below to successfully delete and manage cookies (managing cookies can be different depending on the browser you're using).

Edge – <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy>

Firefox – <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>

Google Chrome – <https://support.google.com/chrome/answer/95647?hl=en>

Internet Explorer – <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies>

Opera – <http://www.opera.com/help/tutorials/security/cookies/>

Safari – <https://support.apple.com/kb/PH21411>

#### **4. Direct Marketing**

Subject to your consent, we may use the personal data you provide for direct marketing carried out by us or third parties - our partners on behalf of us. For the purpose of direct marketing, we intend to use your name, contact details and demographic information and market any services events offered or arranged by us and/or third parties. We may not use your personal data for such purpose unless we have received your consent.

You can unsubscribe from all marketing communications. Every time you receive a mail or an e-mail from us, you will be provided with the choice to opt-out of future mails or e-mails by following the instructions provided therein. You may also opt-out by contacting us (our Support team) if you no longer wish any of the personal data provided to be used in any of the above described direct marketing purposes.

You may provide your consent for Company to use your data or provide to other persons your data for use in direct marketing as described above by notifying us by email or sending message to Support in Customer Account.

If at any time in the future you do not wish to receive direct marketing promotional information from us with respect to the telecommunication and/or other categories of products/services mentioned above, or do not wish us to disclose, transfer or use your personal data for the aforesaid direct marketing purposes, please contact our Support or send an e-mail.

#### **5. Disclosure of Personal Data**

The information we collect about you will not be disclosed by us to any other party without your prior consent.

However, where disclosure of personal data is necessary to satisfy the purpose, or a directly-related purpose, for which the personal data was collected, we may provide such personal data to the third parties.

By submitting your personal data to us and accepting this PICS, you allow us to disclose and transfer (whether in Hong Kong or overseas) your personal data to the following parties to use, disclose, process or retain your personal data for the purposes mentioned above:

- ✓ any person (our employees and/or professional advisers eligible to work with personal data) or company who is acting for or on behalf of Company in respect of the purpose or a directly-related purpose for which the personal data was provided;

- ✓ our contractors, suppliers, (sales) agents, customer support service, telecommunications operators, and other service providers who provides administrative, marketing and research, distribution, data processing, telemarketing, telecommunications, IT, network, computer, payment or other services to Company in connection with its operation for the provision of Services;
- ✓ the business partners of Company for direct marketing use as described in “Direct Marketing” above;
- ✓ any financial institutions, including banks, necessary to establish and support the donations of any funding activities organized by Company or payment for any services provided to you;
- ✓ debt collection agencies, credit reference agencies and security agencies;
- ✓ government and regulatory authorities, law enforcement agencies, courts and other organizations, as required by law, by court order or in response to any legally valid inquiry, or otherwise necessary for the establishment, exercise or defense of legal claims, to obtain legal advice, or to exercise and defend Company’s legal rights.

By submitting your personal data to us, you understand and consent to the transfer of such information as described above.

## **6. Retention of Personal Data**

All personal data we collect will be stored only for a duration that is relevant to the purpose for which it is collected and for as long as permitted or required by the applicable law.

## **7. Security Measures**

ML Cloud has taken all the necessary measures to provide you with the highest level of privacy.

We have implemented reasonable precautions to protect the information we collect from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. We protect the security of your information during transmission to or from ML Cloud websites, applications, products, or services by using encryption protocols and software. For example, we take measures, including data pseudonymization and encryption (Secure Socket Layer (SSL) protocol), to protect the transmission of sensitive end-user information. It means that the information you submit in filling an online form will be encrypted (a secure means of transmission) when it is sent electronically to us. Furthermore, our payment processors are compliant with the PCI DSS (Payment Industry Data Security Standard) and follow it when handling your credit card data. We maintain physical, electronic, and procedural safeguards in connection with the collection, storage, and disclosure of personal information. Our security procedures mean that we may request proof of identity before we disclose personal information to you.

Moreover, we store your data on highly-managed systems that have limited access and are located in controlled facilities in Hong Kong. ML Cloud implements technical measures and industry-standard safeguards. This allows us to implement effective controls in order to protect your integrity and the integrity of your data at all times.

Regardless of whether your data is stored on-premises, in a corporate data center, or in the public cloud, we ensure that facilities are secured against intruders and have adequate fire suppression measures and climate controls in place. We follow the principle of “least-privilege access” throughout our entire IT environment. This means granting database, network, and administrative account access to as few people as possible, and only those who absolutely need it to get their jobs done.

Maintaining usable, thoroughly tested backup copies of all critical data is a core component of our robust data security strategy. In addition, all backups are subject to the same physical and logical security controls that govern access to the primary databases and core systems.

Nevertheless, we cannot guarantee that our security measures will prevent third-party “hackers” from illegally obtaining this information. We take reasonable measures to prevent such breaches of security, but given the resourcefulness of cyber-criminals we are unable to guarantee that our security is 100% breach-proof. You assume the risk of such breaches to the extent that they occur despite our reasonable security measures.

Even though we have taken the necessary steps to protect your information and the integrity of our website and systems, ML Cloud cannot be held responsible if certain situations during security breach arise. Those situations include the loss, misuse and/or alternation of collected data.

Please bear in mind that the provision of all the data on our website and to ML Cloud is done at your own risk, and it is also your responsibility to ensure that security breaches don't occur, as well as to respond to them accordingly. For example, the password you receive upon registering is your sole responsibility. ML Cloud will not be held responsible for any misuse of your private data if the account was accessed by inputting the password. If you believe that someone has been abusing your account, please notify us as soon as you can.

## **8. Miscellaneous**

In case of any discrepancy between the different language versions in respect of any part or all of this Personal Information Collection Statement, the English version shall prevail. We reserve the right to review, edit, vary or change this Personal Information Collection Statement at our sole discretion and without prior notice. If any amended version of the Personal Information Collection Statement results in any changes to the way we handle your Personal Data that require your consent, we will bring the amended Personal Information Collection Statement to your attention.

## **9. Data Access, Correction Requests and Other Enquiries**

You have the right to request access to and correction of information held by us about you. If you wish to access or correct your personal data, please contact our data protection officer at ML Cloud Limited, SUITE 1802, LIPPO CENTRE, TOWER ONE, 89 QUEENSWAY, HONG KONG or by email (by sending an email with the subject ‘Personal Data Request’) to: [privacy@ml.cloud](mailto:privacy@ml.cloud)

In relation to your request to access or correct your personal data, we will require that you prove your identity to us in order to protect your personal data, which may include your identification document and your correspondence address. Where a request is made, any correspondence may be kept and added to your personal data.

Should you have any enquiries about Company's Privacy Policy and practices, please contact us [support@ml.cloud](mailto:support@ml.cloud).

Company's Privacy Policy Statement is available on our website at [https://ml.cloud/documents/Personal\\_Information\\_Collection\\_Statement.pdf](https://ml.cloud/documents/Personal_Information_Collection_Statement.pdf)