

Please note that this Privacy Policy Statement may be amended from time to time without prior notice. You are advised to check for the latest version on a regular basis. If there is any inconsistency or conflict between the English and other language versions of this Privacy Policy Statement, the English version shall prevail.

## **PRIVACY POLICY STATEMENT**

Last updated on October 1st, 2022

# 1. Our Pledge

ML Cloud Limited ("we", "us", "our", "ML Cloud") respect the privacy rights of visitors to our website ml.cloud and of customers who use our services, including but not limited to hosting service, server products and other telecommunications and Internet services and IT services provided from time to time (collectively referred to as the "Services", "products and/or services"). We are committed to safeguard the privacy of individuals with respect to personal data. The meaning of the term "personal data" ("personal information") adopted in this Privacy Policy Statement is defined in the Personal Data (Privacy) Ordinance (Chapter 486) of Hong Kong ("PDPO", "Ordinance"). "Personal data" means any personally identifying information or sensitive data from which it is practicable for the identity of an individual to be ascertained, such as: name, age, gender, photo image, address, contact details, HKID card or passport/entry permit numbers, education background, academic, assessment and performance records, and co-curricular data.

We pledge to ensure that all our collection, transmission, storage and usage of personal data and personal information shall be carried out in compliance with the Personal Data (Privacy) Ordinance (Chapter 486) ("PDPO", "Ordinance"), under the laws of the Hong Kong Special Administrative Region, as well as the relevant code of practice and guidance issued by the Office of the Privacy Commissioner for Personal Data. In doing so, we will ensure compliance by our staff with the strictest standards of security and confidentiality.

We endeavor to meet fully, and where possible exceed, internationally recognized standards of personal data privacy protection. Where our operations are subject to privacy legislation other than that of Hong Kong (such as due to our carrying out of operational functions outside of Hong Kong), this Statement shall apply so far as it is consistent with such local legislation. We also endeavor to ensure that all our collection, transmission, storage and usage of personal data shall be carried out in compliance with the European Union General Data Protection Regulation ("GDPR"), in case we get personal data of European clients.

Below we inform you about what data is collected, how we use such data, where data is processed, how you may opt out of your data being used, the security provisions around storing your data and how to correct or update your data.

#### 2. Collection of Personal Data

If you are a user of Services ("Customer"), personal data is collected from you to enable ML Cloud to provide Services to you. At times, you may be required to give your personal data including, but not limited to, your name, identity document number and/or its copy, telephone number, location, postal address and/or its proof, email address, credit card information, bank account number etc. Refusal to provide such information may render us unable to provide Services to you, handle any application or request you are making, or may deny you access to certain parts of our websites, or may otherwise defeat the objectives of your visit. If you are just a visitor to this website, other than a Customer, you need not supply any personal data to access this website; we will record your visit only but will not collect any personal data from you unless otherwise stated.

However, personal data may be collected from you when you:

- ✓ place an order for our Service,
- request for quotation, advertising materials.
- ✓ apply for access to our managed online platforms or apps,
- ✓ subscribe to our newsletter.
- ✓ use our online chat service,
- register for marketing event,
- request us information about an available job vacancy,
- respond to a survey,
- ✓ fill out a form for pre/post sales assistance,
- open a support ticket,
- contact us by all means (on social media, by email, by telephone calls etc.).

Information relating to your activity in Account and use of our Services, such as your transaction and operating history (server management), may be automatically collected for our accurate reporting and administration of your account.

Certain information about your computer hardware and software may also be automatically collected through analytical tools when you are browsing our website. This type of data may include, but is not limited to, the browser type and version, operating system, IP address and/or domain name (website address), place and time of connection and its duration (access times). We may collect aggregate information about our visitors, e.g. statistics on the number of visits. Cookies used (if any) in any part of our websites will not be deployed for collecting personal data. More about Cookies you may know in paragraph 4.

Calls between you and our Customer service/Support may be recorded for the purposes of staff training, improvement of Service quality and clarification of contractual issues.

We may develop and acquire additional information about you using third-party sources, browsing, and purchasing history, and so on in order to process certificate requests and to improve our Services.

## 3. Types of Personal Data Collected

Types of personal data collected by ML Cloud may include:

- ✓ your personal information and contact information such as your name, information of your ID document (identity card number, gender, date of birth), taxpayer identification number, mail address(es), service phone number(s) for the Services subscribed and phone number(s) and address(es) made known to us;
- ✓ your business information such as company name and business title;
- ✓ your organizational details;

- ✓ your billing and credit card information, such as name of cardholder, card number and expiry date:
- ✓ your account details, including account numbers, or user accounts;
- ✓ your IP address, browser type, access times, and referring website addresses (more state in paragraph 4); and
- ✓ any other information you provided through online chats, telephone calls, email exchanges with us.

Our Services are not targeted to, intended to be consumed by or designed to entice individuals under the age of 18 (14 in Mainland). If you are under the age of 18, consent from your parent or guardian is required before you provide us with any personal data.

We treat personal information as confidential, except for the information included in an issued digital certificate. Such information may be verified using third party commercial and government resources, and as such, is deemed to be public information.

## 4. Use of Cookies and Other Tracking Mechanisms

We and our third-party service providers use cookies and other tracking mechanisms, including those designed for mobile applications, to track information about your use of our site. we may combine this information with other personal information we collect from you (and our third-party service providers may do so on our behalf).

#### a. Cookies

You should be aware that we record your visit automatically through cookies. Our official website automatically installs and uses cookies on your browser when you access it. For your information, Cookies are small computer files (data structures) that we transfer to your device's hard drive through your web browser for record-keeping purposes. Some cookies allow us to make it easier for you to navigate our site, while others are used to enable a faster log-in process or to allow us to track your activities at our site and service, including for online advertising purposes.

They can save you from registering again when re-visiting a website and are commonly used to track your preferences in relation to the subject matter of the website. You may refuse to accept Cookies by modifying the relevant Internet options or browsing preferences of your computer system, but to do so you may not be able to utilize or activate certain available functions in our websites. Our websites may bar visitors who do not accept some Cookies. More information of Cookies we use on our website you may find in our <a href="https://ml.cloud/documents/Cookie">https://ml.cloud/documents/Cookie</a> Policy.pdf

# b. Disabling Cookies

Most web browsers automatically accept cookies, but if you prefer, you can edit your browser options to block them in the future. The Help portion of the toolbar on most browsers will tell you how to prevent your computer from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. visitors to our site who disable cookies will be able to browse certain areas of the site, but some features may not function.

#### c. Server log files

Our servers automatically record information ("Server Log Files") created by your use of our Services. Server Log Files may include information such as your IP address, browser type, access time, operating system, the referring web page (domain name), pages visited, location, your mobile carrier, device and application IDs, search terms, and cookie information. We gather such statistical information to our own research purposes – to diagnose and improve our Services, to conduct

website trend and performance analysis, and for IT security and system diagnostic purposes. As it is not linked to any personal information, it is separate from your personal data. Except as stated in paragraph 8 (Data Retention), we will either delete the Server Log Files or remove any account identifiers, such as your username, full IP address, or email address, after 6 months.

# d. Clear GIFs, pixel tags and other technologies

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, small clear GIFs are embedded invisibly on web pages. We may use clear GIFs (a.k.a. web beacons, web bugs or pixel tags), in connection with our site to, among other things, track the activities of site visitors and users, help us manage content, and compile statistics about site usage. Clear GIFs can be used to collect certain information from your computer, such as an IP address, the time the content was viewed, a browser type, and the existence of cookies previously set by the same server.

You have the option to render some clear GIFs unusable by rejecting their associated cookies. The clear GIFs may still record an anonymous visit from your IP address but cookie information will not be recorded. We and our third-party service providers may also use clear GIFs in HTML emails to our recipients, to help us track email response rates, identify when our emails are viewed, and track whether our emails are forwarded through embedded links within the messages. We collect this information to gauge user interest and to enhance future user experiences. We use clear GIFs in accordance with applicable laws only.

#### a. Location-based tools

We may collect and use the geographical location of your computer or mobile device. This location data is collected for the purpose of providing you with information regarding services which we believe may be of interest to you based on your geographic location, and to improve our location-based products and services.

#### b. Third parties' analytics

We use automated devices and applications, such as Google Analytics and Yandex.Metrica (or other analytic means), to evaluate usage of our site. We use these tools to help us improve our services, performance, and user experiences. These entities may use cookies and other tracking technologies to perform their services. To learn more about Google's privacy practices, please review the Google Policy at <a href="https://www.google.com/policies/privacy/">https://www.google.com/policies/privacy/</a>; you can read about Yandex.Metrica privacy practices here <a href="https://metrica.yandex.com/about/info/privacy-policy">https://metrica.yandex.com/about/info/privacy-policy</a>.

#### c. Social media widgets and applications

Our website may include functionality to enable sharing via third party social media applications and/or widgets, such as the Facebook, Instagram, LinkedIn, VK, WeChat, Telegram, WhatsApp. These social media applications may collect and use information regarding your use of ML Cloud website. Any personal information that you provide via such social media applications may be collected and used by other members of that social media application and such interactions are governed by the privacy policies of the companies that provide the application. We do not have control over, or responsibility for, those companies or their use of your information.

#### d. Do-Not-Track

Currently, our systems do not recognize browser "do-not-track" requests. You may, however, disable certain tracking as discussed in this section (e.g., by disabling cookies).

# e. Third-party ad networks

We use third parties such as network advertisers to serve advertisements on third-party websites or other media (e.g., social networking platforms). This enables us and these third parties to target advertisements to you for products and services in which you might be interested. Third-party ad network providers, advertisers, sponsors and/or traffic measurement services may use cookies, JavaScript, web beacons (including clear GIFs), Flash LSOs and other tracking technologies to measure the effectiveness of their ads and to personalize advertising content to you. These third-party cookies and other technologies are governed by each third party's specific privacy policy, not this one. We do not provide these third-party advertisers with information about you.

# 5. Purpose of Processing Personal Data

Personal data collected from you may be used by us solely for the following purposes:

# a. To provide our services

Your information is used to process your applications, subscriptions and registration for our products and services and order processing, to conduct business transactions such as billing and to handle your complaints and enquires. It is also used to conduct identity verification and/or credit checks at the time of your application.

# f. To improve our service

Your information helps us more effectively respond to your pre/post sales requests and provide technical support as well as improving the design of our services. Your information also enables us to conduct market research, statistical analysis and improving our Customer service.

# g. To send renewal notices

The email address you provide for order processing may be used to send you renewal notices for your expiring product/service subscriptions.

#### h. To send periodic emails

In addition, we may send you periodic newsletters, new offers, new service updates, legal documents updates, security updates, related product or service information, and status updates on maintenance windows or service availability.

# i. To tell you about our products and services

We may send you information about our products and services and products and services of our business partners that may be of interest to you based on your use of our other products and services, your attendance at our sponsored marketing events, your requests for information about similar products and services, or your sharing of data with social media sites. Your information also allows us to deliver customized content and advertising and to determine the effectiveness of said measures.

## j. To process your application for employment or engagement within us

We may assess your suitability as a candidate for vacant position and to conduct reference checks with your previous employers

# k. To communicate with you and handle your complaints and enquires

# I. To fulfill legal duties

We may use and transfer your personal data if we are obliged by law or a court to perform such action.

### m. To prevent, detect or investigate a crime

# n. For other purposes directly relating to any of the above

These purposes of using your personal data are specified in our "Personal Information Collection Statement" which is available on the following link <a href="https://ml.cloud/documents/Personal Information Collection Statement.pdf">https://ml.cloud/documents/Personal Information Collection Statement.pdf</a>

We collect only the minimum personally identifiable information necessary to carry out the purposes for which we use information.

## 6. Processing of Data and Consent

We will process your data for the purpose of performance of our contract with you or the legitimate interest of our business. In other cases, we will request your consent for the processing of the personal data you may submit.

Your refusal to provide personal data to us for certain products and services may hinder us from fulfilling your order for those products or services. Also, if you deny or withdraw your consent to use personal data or opt out of receiving information about our products and services this may result in you not being made aware of sales promotions, renewal notices, periodic newsletters, new service updates, legal documents updates, security updates, related product or service information, and status updates on maintenance windows or Service availability.

# 7. Sharing of Information and Transfers of Data

As a general rule we do not sell or disclose your personal identifiable information to outside parties or do so only with the consent of the individual concerned. All personal data collected and held by us will be kept confidential, but where disclosure is necessary for us to (a) comply with any statutory or legal obligations or requirements, or (b) provide the Services to you, or (c) carry out the original purpose, or a directly related purpose specified above, for which the personal data were collected, those data may be provided to the following parties (whether within or outside Hong Kong):

- Competent court of law, law enforcement agencies, Office of the Communications Authority or other governmental, statutory or regulatory authorities, institutions or organizations;
- ✓ ML Cloud's associated company(ies), engaging in telecommunications and IT services for provision of the Services (or any part thereof); and
- ✔ Banks, financial institutions, credit card issuing companies, debt collection agencies, telecommunications service operators and other service providers involved in the sale, administration or provision of the Services (or any part thereof).

All the transfer of personal data will be carried out in compliance with the requirements of the PDPO. Your Personal Data will be kept confidential save that we may provide such information to (a) any agent, contractor, or third party who provides services to us, (b) any other person under a duty of confidentiality to us, (c) any person to whom we are under an obligation to make disclosure under any requirements of law, (d) our successor and assigns, and (e) any other organizations, for the purposes set out in paragraph 5 above or any other directly related purpose.

As we continue to develop our business, we may format a group business, undergo a change of control or business combination. In these circumstances it may be the case that your personal data is

transferred to a third party who will continue to operate our business or a similar service under either this Privacy Policy Statement or a different privacy policy statement which will be notified to you. Such a third party may be located, and use of your personal data may be made, outside of Hong Kong in connection with such acquisition or reorganization.

We have partnership with a few global organizations with business processes and technical systems in various countries. In furtherance of the purposes set out in this Privacy Policy, we may share information about you within our group company and transfer it to countries in the world where we do business in accordance with this Privacy Policy. Another jurisdiction outside Hong Kong where we transfer your personal data may not have laws protecting personal data similar to the PDPO (do not provide an adequate level of protection in accordance with Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data (ETS No. 108) and GDPR). We will ensure your data is protected by entering into agreements containing standard contract clauses with each of our group companies or partners. By submitting your Personal Data, you are deemed to have consented to such transfers.

We may also transfer your personal data to trusted third parties in order to serve purposes that are specified above. In circumstances where data is shared with such third parties, they are required to agree to confidentiality terms. This prohibits such third parties from selling, trading, using, marketing or otherwise distributing our customer data. We have implemented, based upon appropriate physical, electronic and managerial measures and controls to safeguard all personal data provided by you and to secure the transmission of such data to the third parties listed above. Your personal data are only accessible by our own personnel or the personnel of the third parties listed above for the purposes specified above. Our own personnel and the personnel of the third party will be instructed to observe duty of confidentiality and the terms of this Privacy Policy Statement when accessing your personal data.

We may also release your information when we believe release is appropriate to comply with the law or protect our rights, property, or safety.

It is our policy to notify Customers of requests for their data from law enforcement unless we are prohibited from doing so by statute or court order. Law enforcement officials who believe that notification would jeopardize an investigation should obtain an appropriate court order or other process that specifically precludes member notification.

We may also disclose your personal information to third parties who may take over the operation of our site or who may purchase any or all of our assets, including your personal information. We will contact you using the details you provide if there is any change in the person controlling your information.

#### 8. Data Retention and Deletion

The personal information we collect is retained for no longer than necessary to fulfil the stated purposes above or for a period specifically required by law or regulation that we are obligated to follow. As a general rule, we store your data for another 6 months after the provision of the Service.

Should your account or relationship with us be cancelled or terminated at any time, we shall cease processing your personal data as soon as reasonably practicable following such cancellation or termination, provided that we may keep copies of your data as is reasonably required for archival purposes, for use in relation to any actual or potential dispute, for our legitimate business interests or performance of contractual obligations, for the purpose of enforcing any agreement we have with you,

for protecting our rights, property or safety, or the rights, property or safety of our employees, and for performing or discharging our functions, obligations and responsibilities.

We endeavor personal data are stored for the shortest time possible.

Even if you request deletion or erasure of your data, we may retain your personal data to the extent necessary and for so long as to comply with applicable laws and regulations and/or to fulfill statutory obligations to keep the data for a fixed period of time (for example national labor, tax or anti-fraud laws requiring us to keep personal data about our employees for a defined period, product warranty duration, etc.).

After the retention period is over, we will securely dispose or anonymizes your personal information in order to prevent loss, theft, misuse, or unauthorized access.

### 9. Direct Marketing

Your name and contact details, including email address(es), service phone number(s) for Services subscribed and phone number(s) and address(es) made known to us, collected from you may be used by us for direct marketing of:

- our products and services;
- events that are organized by us or we participate in; and
- the products and services of our business partners

We may not so use your personal data unless we have received your consent. You acknowledge that telephone calls with our staff may be recorded and used as evidence by us without further notice.

If you wish to opt-out from receiving any direct marketing material or information from us, you may click on an "unsubscribe" button or an unsubscribe link at the bottom of the email body that we sent to you. You also may write a letter or send an email to our Customer Service Department at 15F, Radio City, 505 Hennessy RD, Causeway Bay, Hong Kong or privacy@ml.cloud. Upon receipt of your request, we shall cease to so use your personal data without charge to you.

# 10. Opting out; withdrawing consent

If at any time you would like to unsubscribe from receiving future emails, we include unsubscribe instructions at the bottom of each email.

If we are processing your personal data based on your consent, you may withdraw your consent at any time by contacting us.

# 11. External links

This Privacy Policy Statement only applies to this website. This site may contain links to other sites and pages. By activating a link, such as for example by clicking on the banner of an advertiser, you leave this site and ML Cloud does not exercise control over any personal data or any other information you give to any other entity after you have left this site. Access to and use of such other websites is at your own risk.

The Site and our Services may contain links to third-party websites that are not owned or controlled by us. We assume no responsibility for the content, terms and conditions, privacy policies, or practices of any third-party websites. In addition, we do not censor or edit the content of any third-party websites. By using the Site or our Services, you expressly release us from any and all liability arising from your use of any third-party website. Accordingly, we encourage you to be aware of

when you are leaving our Site or the Services found at our Site and to review the terms and conditions, privacy policies, and other governing documents of each other website that you may visit.

#### 12. Data Protection

We are committed to data-protection principles state that personal data must be:

- ✓ processed lawfully, fairly and in a transparent manner in relation to the data subject processed confidentially and securely;
- collected and processed for a specific and lawful purpose;
- collected only to the amount necessary with regard to the purpose of the processing;
- updated when required inaccurate personal data must be erased or rectified without delay;
  and
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.

Our staff are required to strictly adhere to our Internal Guidelines on Record Retention and Access to Personal Data. Physical records containing personal data are securely stored in locked areas when not in use. Access to such physical and/or computer records is strictly controlled and requires management approval for each access. Approvals for access to customers' personal data are granted only on a "need to know" basis. Where we retain, use and/or transmit customers' personal data, we have put in place adequate measures to protect it from accidental and/or unauthorized disclosure, modifications, loss and/or destruction.

In order to prudently preserve all personal data obtained from users of our websites (Customers), apart from firewalls and other sophisticated technical facilities, we also provide and maintain other stringent security measures so as to protect our system as well as the information and data retained therein from accidental or malicious destruction or damage. All supplied sensitive information is transmitted via Secure Socket Layer (SSL).

After a transaction, your transaction-related information will be kept on file to meet audit requirements and facilitate renewals. We do not retain any credit card details. We use a reputable third party to process credit card payments and needs to provide credit card numbers and identifying financial data directly to the third-party payment processor. Such information is shared securely.

Unfortunately, the internet is not a totally secure medium, and no data transmission over the Internet or wireless network can be guaranteed 100% secure. While we strive to protect your personal information (to prevent unauthorized access, processing or other use of that data), there are security and privacy limitations of the Internet which are beyond our control. Information and data may be viewed or tampered with in transit by a third party, despite best efforts. We will review our security measures from time to time in order to keep abreast with technological changes.

# 13. Personal Data Accuracy and Access

You are responsible for providing us with true, accurate, current and complete personal information. You also are responsible to maintain and promptly update the information to keep it true, accurate, current and complete.

Your application for our Services may be subject to capacity assessment and verification of your personal details. If we regard results of such checking is unsatisfactory, we will not enter into an agreement with you. Under certain circumstances, data provided by you will be validated by using generally accepted practice. We may also require you to show the original documentation before the data may be used, such as personal identification document and/or proof of address. If you provide

any information that is untrue, inaccurate, not current or incomplete, or if we have reasonable grounds to suspect that such information is untrue, inaccurate, not current or incomplete, we have the right to suspend or terminate your account and refuse any and all current or future Services.

In accordance with section 18. 22 and Principle 6 of Schedule 1 to the PDPO, you have the right to access and modify your personal data held by us.

If you want to access and/or correct your personal data which you have given us, or if you want to ascertain our policies and practices in relation to personal data and the kind of your personal data held by us, please contact Support in writing (by e-mail or in a ticketing system), we will respond within 30 days after receiving the request. We reserve the right to charge you a reasonable fee for complying with a data access request as permitted by the PDPO.

## 14. Compliance with Relevant Laws

We commit itself to protect the personal information submitted by Customer of our Services. We declare to fully respect all rights established and laid out in statutes and operates within the limits of the Personal Data (Privacy) Ordinance (Cap. 486) (Hong Kong) and the Personal Information Protection Law (Mainland China).

In compliance with the relevant statutes, you have the right to:

- ✓ ascertain our policies and practices established (from time to time) in relation to personal data and the types of personal data held by us;
- review your personal data that we hold and check it for accuracy (You have the right to access to your data. If we agree that we are obliged to provide personal information to you, we will provide it to you free of charge. Before providing personal information to you, we may ask for proof of identity and sufficient information about your interactions with us that we can locate your personal information.);
- correct data in the case that errors may be found in our records (If the information we hold about you is incorrect, you may ask us to correct any inaccuracies in your personal information);
- request that any of your personal data be erased/deleted, i.e. right to be forgotten;
- obtain and reuse your personal data for your own purposes;
- request that we restrict the processing of your personal data under certain circumstances (Where we process your personal information on the legal basis of the consent from you, you have the right to withdraw your consent at any time by contacting us via the email below (note: withdrawal of consent does not affect the validity of our consent-based personal information processing prior to the withdrawal.); and to
- object to our processing of your personal data (You may have the right to object to us processing your personal information if we are not entitled to use it anymore.).

If you have submitted personal information to ML Cloud, we guarantee you the aforementioned rights. You can make a request or exercise these rights by contacting ML Cloud at privacy@ml.cloud and we will make all reasonable and practical efforts to comply with your request, so long as it is consistent with applicable law and professional standards.

#### 15. Provisions relating to individuals based in the EU and the UK

If you are based in the EU or UK, you have a number of additional legal rights in relation to the personal information that we hold about you under the General Data Protection Regulation ("GDPR"). These rights include:

### a. Right to be informed:

You have a right to obtain certain information about our processing, including: the purposes of processing the data; the categories of personal data processed; the recipients who receive your personal data; how long we store your personal data or the criteria we apply to determine retention periods; information on the source of the data where it is not collected directly from you; information on the safeguards we use to secure cross-border transfers; and whether we use automated decision making.

### b. Right of access:

You have a right to obtain confirmation of whether or not personal data concerning you is being processed, and if so, receive a copy of any personal data which we process about you, in a commonly used and/or machine-readable format. You have a right to know where personal data concerning you is being processed. This extends to the right to request that we transmit your personal data to another data controller, where technically possible. Please note that there may be circumstances in which we are entitled to refuse requests for access to copies of personal information.

## c. Right to rectification:

You have the right to have inaccurate personal data rectified, or completed if it is incomplete. You can make a request for rectification verbally or in writing. We have one calendar month to respond to a request. In certain circumstances we can refuse your request for rectification.

## d. Right of erasure:

You have a right to request the erasure of your personal information in certain circumstances (including where it is no longer necessary for us to retain your personal data for the purposes for which we collected it; or where you withdraw your consent).

#### e. Right to restrict data processing:

You have a right to restrict the processing of your personal data in certain circumstances (including where you contest the accuracy of the data).

# f. Right to object to data processing:

You have a right to object to the processing of your personal data in certain circumstances (i.e. for direct marketing purposes or for statistical purposes).

# g. Right to withdraw your consent:

You have a right to withdraw your consent at any time, although this will not affect the lawfulness of any processing carried out before the withdrawal.

# h. Right to lodge a complaint:

You have a right to raise a complaint with the relevant data protection authority, if you think that any of your rights have been infringed by us.

#### i. Right to Avoid Automated Decision-Making:

You have the right not to be subject to automated decision-making in relation to your personal data. We can confirm that we do not use automated decision-making.

### j. Right to be notified of a data security breach:

You have a right to be notified in the event of a personal data breach which is likely to result in a high risk to your rights.

We will do our best to guarantee you an adequate level of protection of personal data, and we will try to satisfy all your requests related to exercising your rights under the GDPR.

### 16. Changes to our Privacy Policy

We regularly review this Privacy Policy Statement and may from time to time revise it or add specific instructions, policies and terms. Once such changes made in we publish new version of the Privacy Policy Statement on our website (with revised the "updated" date at the top of this page). Please check back regularly to make sure you are aware of any changes and to stay informed of how we are protecting your information.

Where any changes to this Privacy Policy Statement are material, we may alert you by posting a prominent notice on our website. Where required by the PDPO we will notify you of material changes to this Policy using the contact details you have provided us with and give you the opportunity to opt out of these changes. Otherwise, in relation to personal data supplied to us through the ML Cloud website or otherwise, continued use by you of the ML Cloud website or your continued relationship with us shall be deemed to be your acceptance of and consent to this Privacy Policy Statement as amended from time to time.

# 17. Enquiries

In order to communicate with you and to provide our products and services and related support, it is necessary for us to process your personal data. In such case, we are the data controller for the information we collected from you. Should you have any enquiries concerning this Statement and the processing of personal data, please address your questions and requests to our Data Protection Officer in writing

by post:

SUITE 1802, LIPPO CENTRE, TOWER ONE 89 QUEENSWAY, HONG KONG

by email at: privacy@ml.cloud