

# **PRIVACY POLICY STATEMENT**

Korum Consulting Limited and its related entities (collectively, the "KorumLegal Companies") are committed to protecting and respecting your privacy.

This policy, together with our Terms of Use (see our site) and any other documents referred to in it sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting <u>www.korumlegal.com</u> you are accepting and consenting to the practices described in this policy.

### 1. INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following data about you:

- 1.1. Information you give us. You may give us information about you by filling in forms on our site <u>www.korumlegal.com</u> (**our site**), uploading content on to our site or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you:
  - a. register to use our site;
  - b. subscribe to our service;
  - c. search for a product;
  - d. place an order on our site;
  - e. participate in discussion boards or other social media functions on our site;
  - f. complete a survey; and/or
  - g. when you report a problem with our site.
- 1.2. The information you give us may include your name, address, e-mail address and phone number, transaction information, personal profile information or other relevant information or correspondence.

- 1.3. We only retain personal data for so long as it is necessary. We may archive data, however this will only be for as long as the purpose for which it was retained requires.
- 1.4. With regard to each of your visits to our site we may automatically collect details of your visits to our site and the information that you browse or access.

# 2. COOKIES

- 2.1. Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. By continuing to browse the site, you are agreeing to our use of cookies.
- 2.2. We use the following cookies:
  - a. Strictly necessary cookies enables us to operate our site.
  - b. Analytical performance cookies allows us to monitor visits to our site and how visitors move around our site.
  - c. Functionality cookies allows us to recognise you when you return to our site and personalise content for you.
  - d. Targeting cookies records your visit to our site, pages and links which assists with advertising displays relevant to your interests. This information may be shared with third parties.
- 2.3. Please be aware that third parties such as advertising networks and analytics sites may use cookies for which we have no control. These are likely to be analytical/performance cookies or targeting cookies.
- 2.4. Our website uses Google analytics, a web traffic analysis service provided by Google Inc. Please refer to <a href="https://www.google.com/policies/privacy/partners">www.google.com/policies/privacy/partners</a> to find out more about how Google uses data when you use our site and how to control the information sent to Google.
- 2.5. You can block cookies by activating the relevant settings on your browser that allows you to refuse the setting of all or some cookies. However, please note that this may affect your browsing experience on our site (i.e., some information may not be viewable).
- 2.6. You can also prevent Google's collection and processing of data by using the Google Ad Settings page or downloading and installing their browser plug-in.

### 3. USES MADE OF THE INFORMATION

- 3.1. We may use information held about you in the following ways:
  - a. to ensure that content from our site is presented in the most effective manner for you and for your computer;
  - b. to carry out our obligations arising from any contracts entered into between you and us;
  - c. to provide you with the information, products and services that you request from us;
  - d. to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
  - e. to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you; or
  - f. allowing you to participate in the interactive features on our site;
  - g. complying with applicable laws and regulations;
  - h. legal proceedings including collecting overdue amounts and seeking professional advice;
  - i. researching, designing and launching services or products including seminars, events, conferences and forums; and / or
  - j. to notify you about changes to our service.
- 3.2. If you are an existing customer, we will only contact you by electronic means (e-mail, telephone or SMS or e-newsletter) with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you. You may choose not to receive direct marketing or promotional material by letting us know via our email or contact page, or alternatively by using the functional unsubscribe facility that may be included in electronic messages that contain such material.
- 3.3. If you are a new customer, and where we permit selected third parties to use your data in accordance with paragraph 5.3, we (or they) will contact you by electronic means. You may choose not to receive direct marketing or promotional material by letting us know via our email or contact page, or alternatively by using the functional unsubscribe facility that may be included in electronic messages that contain such material.

### 4. INFORMATION WE COLLECT ABOUT YOU

- 4.1. We will use information we collect about you:
  - a. to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
  - b. to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
  - c. to allow you to participate in interactive features of our service, when you choose to do so;
  - d. as part of our efforts to keep our site safe and secure;
  - e. to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you; or
  - f. to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.
- 4.2. We may combine information we collect from other sources with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

#### 5. DISCLOSURE OF YOUR INFORMATION

- 5.1. We may share your information with selected third parties only, including:
  - a. Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you in order to carry out the services agreed between you and us.
  - b. Advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. We do not disclose information about identifiable individuals to our advertisers, but we may provide them with aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement on any given day).
  - c. We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, women in a certain suburb).
  - d. We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience.

- e. Analytics and search engine providers that assist us in the improvement and optimisation of our site.
- f. Credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.
- 5.2. We may disclose your personal information to third parties:
  - a. In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
  - b. If a KorumLegal Company or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
  - c. If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Terms of Use or Terms of Service (see our site) and other agreements; or to protect the rights, property, or safety of the KorumLegal Companies, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction. We may also need to disclose your identity if any content that you have put on our site constitutes a violation of another person's intellectual property rights, or of their right to privacy
  - 5.3. We will not sell or buy personal data to or from any third parties. Any disclosure of personal data to third parties is strictly limited to the situations set out in this privacy policy and in relation to and in order to perform the services of our core business.

## 6. DATA SECURITY

- 6.1. All information you provide to us is generally stored on our cloud-based systems or secure servers in Hong Kong, Singapore or New Zealand. Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.
- 6.2. The data that the KorumLegal Companies collect from you may be transferred to, and stored at, a destination outside of Hong Kong, Singapore or New Zealand. It may also be processed by staff operating outside of those jurisdictions who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of

support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

6.3. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

#### 7. YOUR CONSENT AND RIGHTS

- 7.1. By using our service, visiting our site or sharing information, you consent to the collection and use of your information and other activities as outlined in this Statement.
- 7.2. Under applicable privacy laws, individuals may have the right:
  - a. To check whether we hold personal data about you and to access such data and obtain a copy of the data we hold in relation to you;
  - b. To require us to correct as soon as reasonably practicable any data relating to you which is inaccurate. If, in the circumstances, it is not reasonably practicable for us to make the requested correction, we will take reasonable steps to mark the data as having been subject to your request;
  - c. To ask us to erase the personal data relating to you which we possess or to restrict processing of such data; and
  - d. To lodge a complaint with your relevant data protection supervisory authority.
- 7.3. You may also have the right, under applicable privacy laws:
  - a. To ascertain our policies and practices in relation to that personal data and the kind of personal data held by us; and
  - b. To object to the use of your personal data for marketing purposes and we shall not use your personal data for marketing purposes after you communicate your objection to us. We will usually inform you (before collecting your data) if we intend to use your data for such marketing purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by contacting us at HQ@korumlegal.com.
- 7.4. Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these

websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## 8. ACCESS TO INFORMATION

8.1. You have the right to access information held about you. Your right of access can be exercised in accordance with applicable privacy laws. Any access request may, depending on the substance of the request, be subject to a reasonable fee to meet our costs in providing you with details of the information we hold about you.

## 9. CHANGES TO OUR PRIVACY POLICY

9.1. Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

# **10.** GOVERNING LAW

10.1. This Privacy Policy Statement shall be governed by the laws of Hong Kong SAR and you agree to submit to the exclusive jurisdiction of the Hong Kong courts.

## Information about us

Korum Consulting Limited is registered in Hong Kong under company number 2195895. We are a limited company and have our registered office at 4/F Asia Standard Tower, 59-65 Queens Road Central, Central, Hong Kong.

Our Singapore entity, Korum Consulting Pte. Ltd., is registered in Singapore as a private company limited by shares, under company number 201704778M and has its registered office at 114 Lavender Street, #09-88 CT HUB 2, Singapore 338729.

Our UK entity, Korum Consulting Limited, is registered in England and Wales as a private company limited by shares, under company number 09402466 and has its registered office at 20-22 Wenlock Road, N1 7GU London, United Kingdom.

## Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to <u>HQ@korumlegal.com</u>.

## Updated May 2018