



## PRIVACY POLICY

### ABOUT FRINGEBACKER

FRINGEBACKER EVENTS LIMITED ("FRINGEBACKER", "FRINGEBACKER EVENTS", "WE", "US", "OUR") OWNS AND OPERATES FRINGEBACKER EVENTS. WE RECOGNISE THE IMPORTANCE OF YOUR PRIVACY AND MAINTAINING THE CONFIDENTIALITY OF YOUR PERSONAL INFORMATION. THIS PRIVACY POLICY APPLIES TO ALL PRODUCTS AND SERVICES PROVIDED BY US AND SETS OUT HOW WE MAY COLLECT, USE AND DISCLOSE YOUR PERSONAL INFORMATION. THIS PRIVACY POLICY IS GOVERNED BY AND OBSERVES THE REQUIREMENTS OF THE PERSONAL DATA (PRIVACY) ORDINANCE (CAP. 486) (THE "ORDINANCE").

In this Privacy Policy ("**Policy**"), we describe the personal information that we collect from visitors to and users of our websites ("**Sites**"), our blogs, our mobile applications ("**Applications**"), and our online products and services (collectively, "**Services**") and how we collect, use, and share personal information in the course of our business activities.

If, during the Services, we collect your personal information on behalf of a third party, such as one of our customers who is an event organizer ("**our Client**"/"**Client**"), this will be brought to your attention at the time you provide your personal information. This Policy does not cover our Clients' use of your personal information outside of our Services. We are not responsible for the privacy practices of our Clients, as such we encourage you to read their respective privacy statements. Further, as a result of your interactions with our Services or use of the Sites, you may purchase products or services offered by third parties (e.g. merchandise, sponsors items, etc.) or you may elect to participate in contests, sweepstakes, or other programs (such as discount or rewards programs), offered or sponsored by third parties on the Site. We are not responsible for any such purchase you make, or participation you undertake, and as such any such purchase or participation will be subject to the relevant third party's terms and conditions.

Your privacy is important to us and we have taken steps to ensure that we do not collect more information from you than is necessary for us to provide you with our services and to protect your account.

### WHAT PERSONAL INFORMATION WE COLLECT

The information we collect from you allows you to log into our Sites, use our Services and Applications, and register for and/or set up registration for you or your organization's own customers for events, contests, camps, licenses, classes, tickets, facility/equipment use, transactions, sales, memberships, reservations, donations, and/or activities (collectively, "**Events**").

We may ask you to provide personal information when you use our website and services, including when you enter into transactions on our website or enrol for certain programmes ("Programmes"). The data that we may ask you to supply includes without limitation to salutation, name, day and month of birth, gender, ID/passport number, telephone number, email address and residential address ("Personal Data").

In some cases, we may handle "special categories of personal data" about you which may be considered sensitive. This would be the case, for example, if you have submitted a medical

information or document to (i) proof your eligibility to participant in an event, or (ii) for use of a cancellation protection or a refund from an event.

We will not ask for data related to race, ethnic origin, political opinions, religious or philosophical beliefs, trade union memberships, generic or biometric data, sex life or sexual orientation.

Please note that it is mandatory for you to provide certain categories of Personal Data (as specified at the time of collection). In the event that you do not provide any Personal Data marked as mandatory, we may not be able to provide you with products or services or rewards (including registering you for our Programmes).

## **HOW WE USE YOUR PERSONAL DATA**

We will only use your personal data when the law allows us to. Most commonly, We will use your personal data in the following circumstances:

- i. processing your use of FringeBacker Events and your Programmes and maintaining and managing your relationship with FringeBacker Events;
- ii. verifying your identity;
- iii. verifying your eligibility to make use of FringeBacker Events and to participate in our Programmes;
- iv. providing you with a log-in ID for our website;
- v. providing you with products, services and other rewards, or anything else under any of our Programmes or any other activity conducted by FringeBacker Events or its affiliates or clients to offer you better customer service;
- vi. contact you to confirm or finalise your registration, purchase or transaction;
- vii. providing you with customer service and responding to your queries, feedback or claims;
- viii. communicate with you in all matters in relation to our Services or the Events you are registered for;
- ix. performing research or statistical analysis to improve our products and services and for marketing and promotional purposes; and;
- x. making such disclosures as may be required for any of the above purposes or as required by law or in respect of any feedback or claims made by you.

We may also disclose and transfer (whether in Hong Kong or abroad) your Personal Data to third party services providers engaged by us to assist with providing you with our services (including data entry, managing our customer database, contacting you regarding promotions, products, rewards, vouchers and redemption letters and customer service) and securely disposing of your Personal Data ("Third Party Service Providers"). These Third Party Service providers are under a duty of confidentiality to us and are only permitted to use your Personal Data in connection with the purposes specified above, and not for their own purposes (including direct marketing).

When necessary we may also disclose and transfer (whether in Hong Kong or abroad) your Personal Data to our professional advisers, law enforcement agencies, insurers, government and regulatory and other organisations for purposes specified above.

## **MARKETING & PROMOTIONS**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We will get your express opt-in consent before we use your Identity Data, Contact Data, Technical Data, Usage Data and/or Profile Data to contact you about (a) FringeBacker Events; (b) goods and services offered by FringeBacker Events' affiliates;

and (c) goods and services offered by FringeBacker Events' partners. Such goods and services for each of the foregoing may include those related to art, charities, crowdfunding, culture, design, development, education, film, fashion, food, fundraising, games, music, performance, publishing, social causes, science, sports, and technology that may be of interest to you (We call this marketing & promotions).

### **COOKIES**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of the Site may become inaccessible or not function properly

### **THIRD PARTIES**

We may have to share your personal data with the parties set out below and we will get your express opt-in consent before we share your personal data with any third party company.

(a) Internal Third Parties

(b) External Third Parties

(d) Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow Our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with Our instructions.

### **HOW DO WE STORE AND PROTECT YOUR PERSONAL INFORMATION**

All reasonable efforts are made to ensure that any personal data held by us is stored in a secure and safe place and accessed only by our authorised employees or authorised Third Party Service Providers. We protect your personal information using technical and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure and alteration. Some of the safeguards we use are firewalls and data encryption, physical access controls to our data centres, and information access authorization controls.

You should be aware that no system is impenetrable, and no information provided over the Internet can be guaranteed to be completely secure. Accordingly, we cannot guarantee the security of any information that you transmit to us or receive from us over the Internet.

### **DATA RETENTION**

We retain your personal information for as long as necessary to provide the Services you have requested, or for other essential purposes such as complying with our legal, account or reporting obligations, resolving disputes, and enforcing our policies.

How long we retain personal information can vary significantly based on context of the Services we provide and on our legal obligations. By law, we have to keep basic information about Our customers (including Contact Data, Identity Data, Financial Data and Transaction Data) for seven years after they cease being customers for tax purposes.

After it is no longer necessary for us to retain your personal information, we will dispose of it in a secure manner according to our data retention and deletion policies.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## **LINKS**

This site may contain links to other sites and pages which are operated by third parties. We have no control over the content of the linked websites or the way in which the operators of those websites deal with your Personal Data. You should review the privacy policy for those third party websites to understand the ways in which your Personal Data may be used by those third parties. Information Collected When You Use Our Website.

We may use 'cookies' on this site to:

- enable tighter security
- enable online customers to keep browsing
- personalise sites for customers
- build online customer or visitor profiles

Cookies are pieces of information stored in your hard drive about your preferences on our site, which enable the site to be tailored to you in future visits. Customers who want to disallow cookies can do so on their web browser. However, by disabling cookies you may not be able to access all parts of our website.

## **YOUR RIGHTS TO MANAGE YOUR PRIVACY**

You may opt out of our marketing messages at any time using the unsubscribe links in our emails. You can check or uncheck relevant boxes to adjust your marketing and communications preferences by following the opt-out links on any marketing message sent to you or by contacting us at [cs@fringebacker.com](mailto:cs@fringebacker.com)

Under the Ordinance, you have the right of access to personal information held by us and to request correction of the information.

## **CONTACT US**

If you have any questions regarding this Privacy Policy or if you wish to access or correct your Personal Data, you may send your request by email: to [cs@fringebacker.com](mailto:cs@fringebacker.com) or in writing to the following address: Personal Data Officer FringeBacker 17A, EGL Tower 83 Hung To Road Kowloon, Hong Kong. In accordance with the Ordinance, we reserve the right to charge you a reasonable fee for the processing of any data access or correction request.

We may amend or update this Privacy Policy from time to time and all information will be governed by our most recent Privacy Policy, available on our website at [www.fringebackerevents.com](http://www.fringebackerevents.com)

If there is any inconsistency between the English and other language versions of this Privacy Policy, the English version shall prevail.