

PopCoin Rewards Club Privacy Policy

Last updated: 5th January, 2025

1. We care about your privacy

We care about protecting and respecting your privacy. In order to serve you better and provide you with the best customer experience, we need to collect some personal data about you. This Privacy Policy will help you understand how we collect and use your personal data, who we share your personal data with, and how you can control the way your personal data is collected and used by us.

If you access or use our website (www.miraisoftech.com/popcoin) (which we will refer to as "Site" in this Privacy Policy) or mobile application ("App"), or register to join as a member of our PopCoin Rewards Club ("Membership"), then this Privacy Policy is deemed to be agreed by you and will apply to you. If you do not agree with this Privacy Policy, please stop using our Site or App, and do not apply for a Membership.

2. Who are we?

PopCoin Rewards Club is a lifestyle rewards programme ("PopCoin") that enables members to earn and redeem PopCoin points ("Points") in return for products, discounts, services, or vouchers ("Rewards") from participating businesses ("Partners"). PopCoin is owned and operated by Mirai Softech Limited ("Mirai", "we", "us", "our"), the data controller. Personal data we collect about you will be used in line with this Privacy Policy.

3. How do we collect data?

Your personal data will either be provided by you, or will be collected by us, Mirai Softech Limited or our Partners, or captured automatically. For example, we collect your personal data when you complete your Membership application, when you transact with a Partner and accumulate Points on your Membership account ("Account"), when you redeem a Reward, when you send us emails or when you browse our Site or App.

4. Are you over 18?

Our Site, App and PopCoin are only intended for people over the age of 18. However, if you are under the age of 18, you may only use our Site or App, or apply for a Membership if this has been authorised by your parent or legal guardian and you have obtained their consent to use our site or App, or become a PopCoin Member, on the basis of this Privacy Policy.

5. What information do we collect about you?

It may be necessary for you to provide us with certain personal data in order for you to receive the benefits of PopCoin, our Site or App. We will let you know when such data is essential for Membership. All other personal data is up to you to provide or not, as you prefer.

(a) Your Membership

If you are a PopCoin member ("Member"), some of the personal data we may collect about you includes:

- i. your full name, month and year of birth, email address, telephone number, postal address, username, and password;
- ii. your Membership number ("PopCoin ID"), points balance, Account status and activities relating to your Account;
- iii. your transaction history or payment details when you purchase anything from our Partners and you use your Membership to accumulate Points (including the product or service purchased, the date of purchase, where you made your purchase, the cardholder's name, credit card number, expiry date and billing information);
- iv. information about the Rewards you redeem; and
- v. your shopping preferences, including brand preferences and the types of products and services you may be interested in.

(b) When you visit our Site or App

We may use online tracking technology such as cookies, pixel tags, web beacons and other similar technologies (for example, we may use Google Analytics – to learn how Google Analytics collects and processes information, please visit: ["How Google uses information from sites or apps that use our services"](#)) to automatically collect information about:

- i. your visits to our Site or App, such as your browsing history, how long you stay on our Site or App, and how often you visit;

- ii. your location information as provided by your mobile or other device when you interact with our Site or App, including your IP address and general geographic location; and the device that you use to browse our Site or App (e.g. your device ID, operating system, type of device, browser type and version, mobile application crashes and other system activity, and third party sites you were using before interacting with our services).

You have the right to disable any of these online tracking technologies. To learn more about how we use the above data, please see the section below on Online tracking technology.

(c) Other information

We also collect some of your personal data whenever we communicate with you (e.g. email content, contact information, etc.), or when you complete any voluntary surveys and questionnaires we may send you from time to time (e.g. your demographic information and feedback) to better understand you, improve our services and/or our membership programme.

6. How do we use your information?

We will only use your personal data for the purposes set out below.

(a) Account administration

To help administer and maintain your Account, including:

- i. creating and updating your Account;
- ii. verifying your identity;
- iii. creating a single profile about you, including combining your information with any other personal data already held by us or any members of the Mirai Softech Limited;
- iv. processing Points issuance and Reward redemptions;
- v. completing transactions, including processing or facilitating payments;
- vi. sending you updates about new features and benefits relating to PopCoin;
- vii. seeking your views and feedback via voluntary surveys and questionnaires so we can better understand you, improve our services and/or our membership programme; and

- viii. enabling features that allow you to personalise your Account on our Site or App, such as bookmarking your favourite Partners.

(b) Customer support

To assist you when you contact us, such as responding to and investigating any of your questions or concerns, and monitoring and improving our customer support services.

(c) Marketing

While you use the App or Site we will display marketing, offers and promotional materials ("Marketing Communications") within the App and Site (including in the Notifications section of the App). We may also directly send Marketing Communications to you ("Direct Marketing") if you choose to receive them. Please see the section on Direct Marketing below for more information on Direct Marketing.

(d) Personalisation

To create personalised Marketing Communications tailored to your interests and preferences, and/or to provide you with the best possible personalised customer experience in relation to our Site, App and your Membership. We may also use data analytics tools to determine whether our or any Mirai Softech Limited partners' offers, advertisements and promotions are effective, as well as to determine whether you may be interested in new products or services, and/or to customise the content and types of offers, products, services and Rewards that we present to you.

(e) Optimisation and improvements

We may use your personal data to understand and improve our Site, App or PopCoin operations, or our Partners' or Mirai Softech Limited operations, through various means, such as the use of analytics tools, research, surveys and feedback forms. This will enable us, our Partners and our Mirai Softech Limited to enhance services or products, develop new features and benefits, and amend business, marketing and strategic operations and plans.

(f) Legal and administration purposes

We may use your personal data to investigate or handle any incidents, claims or disputes, or as otherwise required by law or requested by any law enforcement or regulatory authorities, courts or other governmental agencies. We may also use your personal data in relation to any legal proceedings concerning you.

7. Who do we share your information with?

To protect your privacy, we will endeavour to only share with third parties data which has either been aggregated and anonymised or which otherwise does not contain your name or contact details. However, there may be limited circumstances where we will share data (which may include your personal data) with third parties who may or may not be located overseas, as detailed in this section. By using our Site or App, or applying for a Membership, you agree to allow us to share your personal data with third parties and to the cross-border transfer of your personal data in accordance with this section. Regardless of where we store or process your personal data, we are committed to protecting it and will take reasonable steps to safeguard it in accordance with this Privacy Policy and all applicable laws.

(a) Partners

If you are a Member, your personal data may be shared with our Partners to facilitate the processing of Points issuance, Points redemption and related transactions, as well as for data analytics purposes in order to improve their operations, services or products.

Please be aware that our Partners may themselves directly collect personal data from you if you give it to them when you purchase any goods or services at their store, or if you register with them as a customer. The handling of your data collected by our Partners will be governed by the relevant Partner's separate privacy policy (and not this Privacy Policy), and we are not involved or responsible for the collection and handling of such data.

(b) Mirai Softech Limited

Your personal data may be transferred to any Mirai Softech Limited members for any of the purposes we have set out above. However, we will not provide your personal data to any Mirai Softech Limited member in order for them to send you marketing materials regarding their own products and services, unless we obtain your prior consent.

(c) Service providers

Your personal data may be shared with our or any Mirai Softech Limited members' service providers (including agents and contractors) who process personal data on our behalf to help us administer and operate PopCoin, our Site and our App, to conduct data analytics, to help aggregate and anonymise the personal data, or to carry out any of the purposes set out above. These may include IT vendors, back-office and front-end or ancillary service providers, call centre operators, marketing agencies, data management and analytics service providers, and customer contact services. Our service providers may contact you on our behalf or on behalf of our Mirai Softech Limited members, for any of the purposes set out above.

We only use trustworthy service providers, who are under an obligation to protect and maintain the confidentiality of your personal data and to only use your personal data in accordance with the purposes outlined in this Privacy Policy.

(d) Professional advisors and assignees

When necessary, we may share your personal data with our professional advisors, including lawyers, accountants, financial advisors and insurers. Your personal data may also be shared with third parties in connection with any merger, acquisition, consolidation, restructuring, sale of assets, financing or any other similar scenarios involving the transfer of some or all of our business assets.

(e) Government and regulatory authorities

This Privacy Policy is governed by the laws of the Hong Kong Special Administrative Region of the People's Republic of China ("Hong Kong"). We strive to handle your personal data in accordance with any data privacy laws that we believe apply to us. Your personal data may be shared with regulatory authorities, courts and other governmental agencies to comply with any legal or regulatory requirements, orders or requests. Any dispute concerning the terms and conditions of this Privacy Policy, shall be subject to the exclusive jurisdiction of the courts of Hong Kong.

8. Aggregated and anonymised data

Aggregated or anonymised data that does not include any personally identifiable information, may be used by us, our Partners, our Mirai Softech Limited members or other third parties for various purposes, including enabling them to better understand customer needs or to improve and adapt their operations, products and services, or for the purposes of industry benchmarking, machine learning, research or analytics.

9. Direct Marketing

If you have agreed to receive offers and promotions from us, we may use your personal data to send you Direct Marketing via email, app push notifications, SMS, post, telephone and such other direct means of communications that you may provide to us ("Contact Points"), in connection with:

- i. the latest news, events, updates, offers, contests and promotions in relation to PopCoin;
- ii. the latest news, events, updates, contests, promotions, offers, products, services and Rewards offered by our Partners or Mirai Softech Limited members, which relate to retail, clothing, accessories, cosmetics, beauty, healthcare and wellness, personal care, toiletries and medical, baby care, maternity care, insurance, financial, music, sports, lucky draws and contests, food, beverages, dining, travel, transportation, banking, electronics, home, household, textiles, telecommunications, groceries, office and business supplies, technology, outdoor furniture and accessories, furniture, lighting, décor, home accessories, media, e-commerce platforms and facilitators, and publications; and/or
- iii. any seasonal events, lucky draws and contests or other promotional activities.

Before providing you with Direct Marketing via your Contact Points, we will ask for your consent. You can choose at any time not to receive any Direct Marketing via your Contact Points by informing us of this choice or setting your communication preferences within the App, Site and/or your mobile device. Please see the section on Your rights below.

10. Can our Partners or affiliates send you marketing materials?

We will not provide your personal data to our Partners or our Mirai Softech Limited members for them to send you marketing materials, unless you allow this.

If any of our Partners or Mirai Softech Limited members wish to directly send you any Direct Marketing regarding their own products and services directly, then they must obtain your separate consent for this. We are not involved in any Direct Marketing done directly by our Partners or Mirai Softech Limited members that is unrelated to PopCoin. However, we may send Marketing Communications to you on behalf of our Partners or Mirai Softech Limited members, subject to your consent and in accordance with the Direct Marketing section above. If you agree to receive any Direct Marketing directly from our Partners or Mirai Softech Limited members, then please carefully read our respective Partners' or Mirai Softech Limited members' own privacy policies.

11. How do we keep your information secure?

We take the confidentiality and security of your information seriously. We take all reasonable steps, including the implementation of technical and physical security measures, to ensure that all your personal

data held by us is kept secure and safe from any loss or unauthorised disclosure, use and modification. All transactions under the terms and conditions of this Privacy Policy are based on the encryption of data exchanged between you and us on our secure Site and App.

12. How long do we keep your data for?

We will keep your personal data only for so long as is necessary to fulfill the purposes outlined in this Privacy Policy, unless the law requires us to keep it for a longer period. Once we no longer need your personal data, we will either irreversibly anonymise or securely delete it on our servers.

13. Your rights

(a) Access and correction

You have the right to access and correct your personal data held by us, at any time, by sending an email to our Data Protection Officer at info@miraisoftech.com.

In order to ensure that your personal data is kept as accurate as possible, please notify us at the email address above of any changes to your personal data.

(b) Opt-out of Direct Marketing

At any time, you can ask us to stop using your Contact Points to send you Direct Marketing, or you can customise how you would like to receive Direct Marketing from us. You can exercise your rights to do this by:

- i. changing your settings on your online Membership user account or in the Site, with respect to App push notifications, email and SMS; or
- ii. changing your settings on your mobile device; or
- iii. following the unsubscribe instructions in the Direct Marketing we send to you; or
- iv. otherwise contacting us to inform us to stop using your Contact Points for Direct Marketing.

We will stop using your Contact Points to send you Direct Marketing in accordance with your request. However, we may still send you non-promotional communications such as information concerning the administration or servicing of your Account and Membership, and may use non-personally identifiable information collected via cookies and other tracking technology to display marketing information via online advertising banners on websites and apps visited by you. In addition, while you use the App or Site we will continue to display Marketing Communications within the App and Site (including in the Notifications section of the App) – if you do not want to view any such Marketing Communications within the App and Site, then you should immediately cease using the App and Site and inform us to delete your Membership and Account.

We are not involved or responsible for any marketing materials sent directly by our Partners or Mirai Softech Limited members that are unrelated to PopCoin. If you would like to stop receiving any marketing materials from our Partners or Mirai Softech Limited members, please contact them directly in order to unsubscribe from their mailing lists.

14. Online tracking technology

Cookies are small text files that are stored on your browser or device by websites, applications, online media and advertisements when you visit a website or mobile application.

We use cookies and other similar identification technologies such as web beacons,ETags and pixel tags on our Site, App, emails and online advertisements for various purposes, including verifying users; remembering user preferences and settings to enhance your experience when you return to our Site or App; delivering relevant content and advertisements based on your preferences, location and usage patterns; monitoring, evaluating and optimising the operation of our Site and App; tracking and measuring the effectiveness of our advertising campaigns; and analysing traffic on our Site, our App and the websites of our Partners or Mirai Softech Limited members.

You can exercise your right to choose whether or not to accept cookies by adjusting your browser settings to modify your cookie preferences. Most browsers are set to accept cookies by default, but you are free to remove or block all browser cookies. However, if you turn off your cookies, some of our services may not function properly and you will not be able to receive the most efficient and personalised experience.

15. Links to other sites

Our Site and App may contain links to other third party websites and applications, including those of our Partners and our Mirai Softech Limited members (“Third Party Sites”). We do not own or control, and are not responsible for the privacy practices of those Third Party Sites. We encourage you to remain alert if you follow any links to leave our Site or App, and to review the privacy policies of those Third Party Sites so that you are aware of how your personal data may be collected and used by such third parties.

16. Information you provide about others

Please ensure that you are legally authorized to share with us any information that contains personal data of another person.

17. How do we manage updates to this policy?

From time to time, we may update this Privacy Policy to reflect new technologies, regulatory requirements or any other changes that may be necessary. We will notify you of any updates in accordance with your preference settings and, where required by law, obtain your consent. We will inform you by emailing you at the email address you provided us, and/or by posting a notice of these changes on our Site. Following such update, if you continue to access or use the Site or App, then the updated Privacy Policy is deemed to be agreed by you and will apply to you. If you do not agree with the updated Privacy Policy, please stop using our Site and App.

18. How to contact us

If you have any questions or comments concerning this Privacy Policy, you can contact our Data Protection Officer at info@miraisoftech.com

We value your privacy and want to be transparent with why we collect your information

E-commerce Service Personal Information Collection Statement (PICS)

If you access or use this E-Comm Service or register to create an account ("User Account") to use this E-Comm Service, then you are deemed to have agreed to this Personal Information Collection Statement. This E-Comm Service is owned and operated by Mirai Softech Limited ("Mirai"). You must be at least 18 years old to use this E-Comm Service.

What do we collect?

It may be necessary for you to provide us with certain personal data in order for you to use our E-Comm Service. For example, we collect your personal data when you create a User Account, browse or make purchases through this E-Comm Service, and when you send us emails. We will let you know when such data is essential. All other personal data is up to you to provide or not, as you prefer.

How do we use your information?

We will use your personal information to:

1. administer and maintain your User Account and provide customer support (e.g. update your account, verify your identity, create a single profile about you by combining your personal data already held by us, MiraiHL or any affiliates of Mirai ("Mirai Softech Limited"), providing you with a log-in ID for your User Account, maintaining, updating, administering and processing a record of your activities on this E-Comm Service, complete any transactions including processing or facilitating payments, send you updates about new features and benefits, and communicate with you);
2. in accordance with Section 9 of the Privacy Policy, provide you with marketing and promotional materials if you choose to receive them, create personalized communications tailored to your interests and preferences, and provide you with the best possible customer experience;
3. improve our operations through various means, such as the use of data analytics tools, research, surveys and feedback forms; this will enable us to enhance our services or products, develop new features and benefits, and assess and amend business, marketing and strategic operations and plans; and
4. investigate or handle any incidents, claims or disputes, defend or bring any claims or actions, or comply with applicable law or any requests from any regulatory authority, court or government agency.

Who do we share your information with?

To fulfil any of the above purposes, we may share your personal data with our Mirai Softech Limited members, professional advisors, any Mirai Softech Limited members' service providers, and regulatory authorities, courts and other governmental agencies. The service providers process personal data on our behalf to help us administer and operate this E-Comm Service, conduct data analytics, aggregate and anonymise personal data, or carry out any of the above purposes. We may also share your personal data with any third party in connection with a merger, acquisition, consolidation, restructuring, sale of assets, financing or any similar scenarios. However, we will not share your personal data with any third party for them to send you any direct marketing materials regarding their own products or services.

Your rights

You have the right to request access to and correction of your personal data held by us at any time, by sending an email to our Data Protection Officer at info@miraisoftech.com.

E-Commerce Service Privacy Policy

Last updated: 5th January, 2025

1. We care about your privacy

We care about protecting and respecting your privacy. In order to serve you better and provide you with the best customer experience, we need to collect some personal data about you. This Privacy Policy will help you understand how we collect and use your personal data, who we share your personal data with, and how you can control the way your personal data is collected and used by us.

If you access or use our mobile and/or website e-commerce services ("E-Comm Service"), or register to create an account ("User Account") to use the E-Comm Service, then this Privacy Policy will apply to you. If you do not agree with this Privacy Policy, please stop using our E-Comm Service, and do not apply for a User Account.

2. Who are we?

The Mirai Softech Limited ("Mirai", "we", "us", "our") operates the E-Comm Service, and is the data controller. The E-Comm Service enables customers to purchase products and services from us or from participating businesses ("Partners"). Mirai is an affiliate of Mirai Softech Limited Holdings Limited ("Mirai"), the ultimate publicly-listed parent company for the Mirai Softech Limited of companies ("Mirai Softech Limited"). Personal data we collect about you will be used in line with this Privacy Policy.

3. How do we collect data?

Your personal data will either be provided by you, or will be collected by us, Mirai Softech Limited or our Partners, or captured automatically when you access or use our E-Comm Service. For example, we collect your personal data when you create a User Account, browse or make purchases through the E-Comm Service, and when you send us emails.

4. Are you over 18?

The E-Comm Service is only intended for people over the age of 18, However, if you are under the age of 18, you may only use the E-Comm Service or apply for a User Account if this has been authorised by your parent or legal guardian and you have obtained their consent to use our E-Comm Service or apply for a User Account.

5. What information do we collect about you?

It may be necessary for you to provide us with certain personal data in order for you to use our E-Comm Service. We will let you know when such data is essential. All other personal data is up to you to provide or not, as you prefer.

(a) Your User Account

If you register for a User Account to use our E-Comm Service, some of the personal data we may collect about you includes:

- i. your telephone number, which we will use to complete your registration and send authentication codes via SMS to verify your identity.
- ii. your full name, gender, month and year of birth, education history, marital status, email address. This information helps us provide you with better personalized recommendations for products and promotions, but is not mandatory. You may choose not to provide this information to us. Doing so will not affect the basic functions of the E-Comm Service.
- iii. account status and activities relating to your User Account.

(b) When you make purchases using the E-Comm Service

If you use the E-Comm Service to make online purchases, some of the personal data we may collect about you includes:

your product searches on the E-Comm Service, to provide autocomplete functionality or to provide you with information about products related to your search. Please note that your search results do not constitute personal data unless we combine it with other information about you which would allow us to identify you. If we do so, we will treat your search keywords as your personal data and store and secure your personal data as described under this Privacy Policy. We may also use this personal data to improve our services.

your shopping preferences and choices with respect to favourites, purchases, follow/bookmarks and share functions offered on the E-Comm Service. While using the E-Comm Service, you may indicate your interest in certain products and brands, and share this information with us or our third party Partners through the E-Comm Service.

your transaction history or payment details when you purchase anything through our E-Comm Service. When you place an order through the E-Comm Service, you will be required to provide the recipient's full name, address and mobile phone number. The order form will set out your identification information (for example your photo or video, your name, telephone number etc.), the recipient's address (or installation address for applicable products), the products/services you purchase, the order number, time of order, payment amount and payment method. We collect this information ("Order Information") in order to complete and secure your transaction, to allow you to review your order, and to provide related customer services to you. We also use Order Information to verify your identity, confirm the transaction, process payment and complete delivery, assist you with queries about your order and provide other after-sales services. Further, we use Order Information to detect irregular activities to protect your transactions and User Account.

your identity, Order Information and contact information in order to verify your identity when you request any after-sales services and dispute resolution services. If you send general enquiries or complaints to us, we may use your Order Information and any information you provide to our customer service representatives (including through any surveys) to provide services to you and make improvements to our services.

(c) When you visit our E-Comm Service

We may use online tracking technology such as cookies, pixel tags, web beacons and other similar technologies (for example, we may use Google Analytics – to learn how Google Analytics collects and processes information, please visit: ["How Google uses information from sites or apps that use our services"](#)) to automatically collect information about:

your visits to our E-Comm Service, such as your browsing history, how long you stay on our E-Comm Service, and how often you visit;

your location information as provided by your mobile phone or other device when you interact with our E-Comm Service, including your IP address and general geographic location (including GPS location and WLAN access point, Bluetooth and other connectivity information); and the device that you use to browse our E-Comm Service (e.g. your operating system, type of device, browser type and version, language preferences, resolution, internet service provider ID (PLMN), mobile

application crashes and other system activity, and third party sites you were using before interacting with our services).

You have the right to disable any of these online tracking technologies. To learn more about how we use the above data, please see the section below on Online tracking technology.

(d) When we provide additional services

We may offer the additional services described below to better personalize products and services offered to you and improve your shopping experience, and request that you provide additional personal information by granting permission for the E-Comm Service to access your devices' location information, camera/webcam, photo album, microphone and address book. If you do not provide the information described below, or revoke permissions granted, your use of the basic functions of the E-Comm Service will not be affected, however you may not be able to receive the additional services. Please note that your decision to revoke permissions will not affect information previously collected and used based on your prior authorization.

Personalized recommendation service based on location information. We collect your location information to determine your location to recommend goods or services available in your area. We will only collect information about your geographical location at specific points in time, and will not combine information about your location collected over different points in time to establish a trail of your movement. For example, we may recommend supermarkets or stores nearest to you.

Additional features based on cameras / webcams. You can use this additional feature to complete video shooting, picture taking, QR code scanning and other functions.

Additional features based on picture uploading. After granting permission for the E-Comm Service to access photo albums on your device, you may use this feature to upload your photos to change your avatar, communicate with customer service representatives, and for verification purposes. We may use the photos uploaded by you to identify goods or services you wish to purchase, or use comment so other messages containing photos uploaded by you.

Additional features based on voice technology. After granting permission for the E-Comm Service to access the microphone on your device, you can contact customer service representatives and interact with the customer service bot. We will record your conversation to respond to your customer service or dispute resolution requests.

(e) Other information

We also collect some of your personal data whenever we communicate with you (e.g. email content, contact information, etc.), or when you complete any voluntary surveys and questionnaires we may send you from time to time (e.g. your demographic information and feedback) to better understand you and/or improve our services.

6. How do we use your information?

We will only use your personal data for the purposes set out below.

(a) Account administration

To help administer and maintain your User Account, including:

- i. creating and updating your User Account;
- ii. verifying your identity;
- iii. creating a single profile about you, including combining your information with any other personal data already held by us or any members of the Mirai Softech Limited;
- iv. providing you with a log-in ID for your User Account to access our E-Comm Service;
- v. maintaining, updating, administering and processing a record of your activities on our E-Comm Service, including any purchases or orders made by you through our E-Comm Service for any products or services ("Orders") and any points or rewards in relation to any rewards programme;
- vi. completing transactions, including processing or facilitating payments;
- vii. sending you updates about new features and benefits relating to our E-Comm Service;
- viii. seeking your views and feedback via voluntary surveys and questionnaires so we can better understand you and/or improve our service; and
- ix. enabling features that allow you to personalise your User Account on our E-Comm Service, such as bookmarking your favourite products or brands.

(b) Customer support

To assist you when you contact us, such as responding to and investigating any of your questions or concerns, and monitoring and improving our customer support services, and to assist you with any delivery, refunds, returns or exchanges for any Orders.

(c) Marketing

While you use the E-Comm Service we will display marketing, offers and promotional materials ("Marketing Communications") within the E-Comm Service mobile App and website (including in the Notifications section of the E-Comm Service). We may also directly send Marketing Communications to you ("Direct Marketing") if you choose to receive them. Please see the section on Direct Marketing below for more information on Direct Marketing.

(d) Personalisation

To create personalised Marketing Communications tailored to your interests and/or preferences, and to provide you with the best possible personalised customer experience in relation to our E-Comm Service and your User Account. We may also use data analytics tools to determine whether our or any Mirai Softech Limited members' offers, advertisements and promotions are effective, as well as to determine whether you may be interested in new products or services, and/or to customise the content and types of offers, products, and services that we present to you.

(e) Optimisation and improvements

We may use your personal data to understand and improve our E-Comm Service, or our Partners' operations, or our Mirai Softech Limited members' operations, through various means, such as the use of analytics tools, research, surveys and feedback forms. This will enable us, our Partners, and Mirai Softech Limited members to enhance services or products, develop new features and benefits, and amend business, marketing and strategic operations and plans.

(f) Legal and administration purposes

We may use your personal data to investigate or handle any incidents, claims or disputes, or as otherwise required by law or as requested by any law enforcement or regulatory authorities, courts or other governmental agencies. We may also use your personal data in relation to any legal proceedings concerning you.

(g) Online purchase

To administer, process and manage your Orders, including any delivery, arrangement for collection, refunds, returns or exchanges.

7. Who do we share your information with?

To protect your privacy, we will endeavour to only share with third parties data which has either been aggregated and anonymised or which otherwise does not contain your name or contact details. However, there may be limited circumstances where we will share data (which may include your personal data) with third parties who may or may not be located overseas, as detailed in this section. By using our E-Comm Service, or applying for a User Account, you agree to allow us to share your personal data with third parties and to the cross-border transfer of your personal data in accordance with this section. Regardless of where we store or process your personal data, we are committed to protecting it and will take reasonable steps to safeguard it in accordance with this Privacy Policy and all applicable laws.

(a) Partners

If you create a User Account with us, your personal data may be shared with our Partners to facilitate the processing of payments and delivery, conduct risk analysis of your User Account, and related services and transactions, as well as for data analytics purposes in order to improve their operations, services or products.

Please be aware that our Partners may themselves directly collect personal data from you if you give it to them when you purchase any goods or services at their store, or if you register with them as a customer. The handling of your data collected by our Partners will be governed by the relevant Partner's separate privacy policy (and not this Privacy Policy), and we are not involved or responsible for the collection and handling of such data.

(b) Mirai Softech Limited

Your personal data may be transferred to any Mirai Softech Limited members for any of the purposes we have set out above. However, we will not provide your personal data to any Mirai Softech Limited member in order for them to send you marketing materials regarding their own products and services, unless we obtain your prior consent.

(c) Service providers

Your personal data may be shared with our or any Mirai Softech Limited members' service providers (including agents and contractors) who process personal data on our behalf to help us administer and operate our E-Comm Service, to conduct identity verification, data analytics/processing, process Orders and payments, arrange delivery, conduct marketing activities, to help aggregate and anonymise the personal data, or to carry out any of the purposes set out above. These may include IT vendors, back-office and front-end or ancillary service providers, call centre operators, marketing agencies, data management and analytics service providers, and customer contact services. Our service providers may contact you on our behalf or on behalf of our Mirai Softech Limited members, for any of the purposes set out above.

We only use trustworthy service providers, who are under an obligation to protect and maintain the confidentiality of your personal data and to only use your personal data in accordance with the purposes outlined in this Privacy Policy.

(d) Professional advisors and assignees

When necessary, we may share your personal data with our professional advisors, including lawyers, accountants, financial advisors and insurers. Your personal data may also be shared with third parties in connection with any merger, acquisition, consolidation, restructuring, sale of assets, financing or any other similar scenarios involving the transfer of some or all of our business assets.

(e) Government and regulatory authorities

This Privacy Policy is governed by the laws of the Hong Kong Special Administrative Region of the People's Republic of China ("Hong Kong"). We strive to handle your personal data in accordance with any data privacy laws that we believe apply to us. Your personal data may be shared with regulatory authorities, courts and other governmental agencies to comply with any legal or regulatory requirements, orders or requests. Any dispute concerning the terms and conditions of this Privacy Policy shall be subject to the exclusive jurisdiction of the courts of Hong Kong.

(f) Mirai Banners

Mirai operates various PopCoin Banners as defined in the E-Comm Service Terms and Conditions. Your personal data may be shared among the Mirai Banners to facilitate the processing of payments and delivery, conduct risk analysis of your User Account, and related services and transactions as well as for data analytics purposes in order to improve Mirai operations and our service offering to you.

8. Aggregated and anonymised data

Aggregated or anonymised data that does not include any personally identifiable information may be used by us, our Partners, our Mirai Softech Limited members or other third parties for various purposes, including enabling them to better understand customer needs or to improve and adapt their operations, products and services, or for the purposes of industry benchmarking, machine learning, research or analytics.

9. Direct Marketing

If you have agreed to receive offers and promotions from us, we may use your personal data to send you Direct Marketing via email, app push notifications, SMS, post, telephone and such other direct means of communications that you may provide to us ("Contact Points"), in connection with:

- i. the latest news, events, updates, offers, contests and promotions;
- ii. the latest news, events, updates, contests, promotions, offers, products, services and rewards offered by us including Mirai Banners, our Partners, or our Mirai Softech Limited members, which relate to our E-Comm Service, reward programmes, retail, clothing, accessories, cosmetics, beauty, healthcare and wellness, personal care, toiletries and medical, baby care, maternity care, insurance, financial, music, sports, lucky draws and contests, food, beverages, dining, travel, transportation, banking, electronics, home, household, textiles, telecommunications, groceries, office and business supplies, technology, outdoor furniture and accessories, furniture, lighting, décor, home accessories, media, e-commerce platforms and facilitators, and publications; and/or
- iii. any seasonal events, lucky draws and contests or other promotional activities.

Before providing you with Direct Marketing via your Contact Points, we will ask for your consent. You can choose at any time not to receive any Direct Marketing via your Contact Points by informing us of this choice or setting your communication preferences within the E-Comm Service and/or your mobile device. Please see the section on Your rights below.

10. Can our Partners and affiliates send you marketing materials?

We will not provide your personal data to our Partners or our Mirai Softech Limited members for them to send you marketing materials unless you allow this.

If any of our Partners or Mirai Softech Limited members wish to directly send you any Direct Marketing regarding their own products and services directly, then they must obtain your separate consent for this. We are not involved in any Direct Marketing done directly by our Partners or Mirai Softech Limited members that is unrelated to the E-Comm Service. However, we may send Marketing Communications to you on behalf of our Partners or Mirai Softech Limited members, subject to your consent and in accordance with Direct Marketing section above. If you agree to receive any Direct Marketing directly from our Partners or

Mirai Softech Limited members, then please carefully read our respective Partners' or Mirai Softech Limited members' own privacy policies.

11. How do we keep your information secure?

We take the confidentiality and security of your information seriously. We take all reasonable steps, including the implementation of technical and physical security measures, to ensure that all your personal data held by us is kept secure and safe from any loss or unauthorised disclosure, use and modification. All transactions under the terms and conditions of this Privacy Policy are based on the encryption of data exchanged between you and us on our secure E-Comm Service.

12. How long do we keep your data for?

We will keep your personal data only for so long as is necessary to fulfill the purposes outlined in this Privacy Policy, unless the law requires us to keep it for a longer period. Once we no longer need your personal data, we will either irreversibly anonymise or securely delete it on our servers.

If your User Account is inactive for three (3) months or longer, we reserve the right to remove your personal data from your User Account. If you subsequently attempt to log into your User Account, you may need to re-verify your identity or re-enter your personal details to continue using the E-Comm Service.

13. Your rights

(a) Access and correction

You have the right to access and correct your personal data held by us, at any time, by sending an email to our Data Protection Officer at info@miraisoftectech.com.

In order to ensure that your personal data is kept as accurate as possible, please notify us at the email address above of any changes to your personal data.

(b) Opt-out of Direct Marketing

At any time, you can ask us to stop using your Contact Points to send you Direct Marketing, or you can customise how you would like to receive Direct Marketing from us. You can exercise your rights to do this by:

- i. changing your settings on your User Account; or
- ii. changing your settings on your mobile device; or
- iii. following the unsubscribe instructions in the Direct Marketing we send to you; or
- iv. otherwise contacting us to inform us to stop using your Contact Points for Direct Marketing.

We will stop using your Contact Points to send you Direct Marketing in accordance with your request. However, we may still send you non-promotional communications such as information concerning the administration or servicing of your User Account, and may use non-personally identifiable information collected via cookies and other tracking technology to display marketing information via online advertising banners on websites and apps visited by you. In addition, while you use the E-Comm Service we will continue to display Marketing Communications within the E-Comm Service mobile App and website (including in the Notifications section of the E-Comm Service) – if you do not want to view any such Marketing Communications within the E-Comm Service, then you should immediately cease using the E-Comm Service and inform us to delete your User Account.

We are not involved or responsible for any marketing materials sent directly by our Partners or Mirai Softech Limited members that are unrelated to the E-Comm Service. If you would like to stop receiving any marketing materials from our Partners or Mirai Softech Limited members, then please contact them directly in order to unsubscribe from their mailing lists.

14. Online tracking technology

Cookies are small text files that are stored on your browser or device by websites, applications, online media and advertisements when you visit a website or mobile application.

We use cookies and other similar identification technologies such as web beacons, ETags and pixel tags on our E-Comm Service, emails and online advertisements for various purposes, including verifying users; remembering user preferences and settings to enhance your experience when you return to our E-Comm Service; delivering relevant content and advertisements based on your preferences, location and usage patterns; monitoring, evaluating and optimising the operation of our E-Comm Service; tracking and measuring the effectiveness of our advertising campaigns; and analysing traffic on our E-Comm Service and the websites of our Partners and Mirai Softech Limited members.

You can exercise your right to choose whether or not to accept cookies by adjusting your browser settings to modify your cookie preferences. Most browsers are set to accept cookies by default, but you are free to remove or block all browser cookies. However, if you turn off your cookies, some of our services may not function properly and you will not be able to receive the most efficient and personalised experience.

15. Links to other sites

Our E-Comm Service may contain links to other third party websites and applications, including those of our Partners and our Mirai Softech Limited members ("Third Party Sites"). We do not own or control, and are not responsible for, the privacy practices of those Third Party Sites. We encourage you to remain alert if you follow any links to leave our E-Comm Service, and to review the privacy policies of those Third Party Sites so that you are aware of how your personal data may be collected and used by such third parties.

16. Information you provide about others

Please ensure that you are legally authorized to share with us any information that contains personal data of another person.

17. How do we manage updates to this policy?

From time to time, we may update this Privacy Policy to reflect new technologies, regulatory requirements or any other changes that may be necessary. We will notify you of any updates in accordance with your preference settings and, where required by law, obtain your consent. We will inform you by emailing you at the email address you provided us, and/or by posting a notice of these changes on our E-Comm Service. Following such update, if you continue to access or use the E-Comm Service, then the updated Privacy Policy is deemed to be agreed by you and will apply to you. If you do not agree with the updated Privacy Policy, please stop using our E-Comm Service.

18. How to contact us

If you have any questions or comments concerning this Privacy Policy, you can contact our Data Protection Officer at info@miraisoftech.com.