

PRIVACY POLICY FOR UNITED BOURNE AVENUE SOLUTIONS WEBSITE (<https://ubasgroup.com>)

INTRODUCTION

United Bourne Avenue Solutions (UBAS Group) is committed to being a responsible custodian of the information you provide to us and the information we collect in the course of operating our business. This Privacy Policy describes how UBAS Group may collect and process information received by us in relation to the operation of the UBAS Group Website (<https://ubasgroup.com>) and the provision of Services as outlined in the Terms of Service. Your Personal Data is processed in accordance with the Personal Data (Privacy) Ordinance (Cap. 486), the General Data Protection Regulation (Regulation EU 2016/679, further - “the GDPR”), the Data Protection Act 2018, and other relevant legislation with respect to the accepted principles of good information handling (collectively referred to as the “Data Protection Legislation”).

This Privacy Policy shall be governed by the laws of Hong Kong. The competent supervisory authority shall be the Privacy Commissioner for Personal Data’s Office.

For all intents and purposes, the English language version of this Privacy Policy will be the original, governing instrument. In the event of any conflict between the English language version of this Privacy Policy and any subsequent translation into any other language, the English language version will govern and control.

DEFINITIONS

- **“Company”** means **United Bourne Avenue Solutions**, a private limited company incorporated in Hong Kong with its registered office at UNIT B, 11/F YAM TZE COMM BLDG, 23 THOMSON RD, WAN CHAI, HONG KONG (the “Company”, “We”, and “Us” hereinafter), which operates the UBAS Group Website available at <https://ubasgroup.com>;
- **“Website”** means the UBAS Group Website operated by the Company and available at <https://ubasgroup.com>;
- **“Privacy Policy”** means the latest version of the Company’s Privacy Policy which describes our policies and procedures pertaining to the collection, use, and disclosure of your Personal Data;
- **“Personal Data”** means any information relating to the User, which identifies or may identify the User;
- **“User”** means an individual or a legal entity that has read and agreed to the Terms of Use and the Privacy Policy and uses the services provided by the Company advertised through the Website (referred to as “you” or “yours” hereinafter);
- **“Services”** means the services provided by the Company and advertised to Users via the Website as set out in detail in the Terms of Use.

INFORMATION WE COLLECT

When you engage with us, we collect and process your Personal Data, which includes:

- Personal identification information, including your name, e-mail address, phone number, country, full address, and date of birth;
- Data collected in connection with “Know Your Customer” (KYC) compliance, “Anti-Money Laundering” (AML) compliance, and “Counter-Terrorist Financing” (CTF) compliance, including but not limited to:

- Your full name;
 - Your residential address;
 - Your contact details (telephone number, email address);
 - Your date and place of birth, gender, place of citizenship;
 - Your bank account information and/or credit card details;
 - Your status as a politically exposed person;
 - Source of funds & proof of address;
 - Passport and/or national driver's license or government-issued identification card to verify your identity.
- Device and website usage data, including: IP addresses; language preferences and other device identifiers; information relating to your access to the Website and the associated mobile application, such as device characteristics, date and time.

HOW WE COLLECT YOUR DATA

We collect Personal Data directly from you when you use our Website, communicate with us via the Website, or interact directly with us via email or our LinkedIn page. For example, direct collection of your Personal Data occurs when you complete the contact form on our Website or when you contact us via email.

We use industry standards for automatically collecting certain information about visitors to our Website. We collect information about you, or information collected by cookies and similar technologies, when you use, access, or interact with our Website. We shall ensure that processing is proportionate and that we have carried out a legitimate interest impact assessment. To the extent that the use of cookies or similar technologies requires your consent, we may also process your Personal Data based on your consent

When you register on the Website, we perform checks at:

- Credit reference agencies to verify the identity information you have provided to us, as part of complying with our legal duties. These checks consist of a 'soft search' and do not impact your credit score.
- KYC (Know Your Customer) and AML (Anti Money Laundering) service providers, as part of complying with our legal duties.

We may also collect information about you from third-party sources, including but not limited to the following channels:

- marketing partners and resellers;
- advertising partners and analytics providers;
- public databases, credit bureaus, and ID verification partners;
- social networks (for example, LinkedIn).

We protect the Personal Data obtained from third parties according to the practices described in this Privacy Policy and we also apply additional restrictions imposed by the source of data.

THE PURPOSES OF COLLECTING YOUR PERSONAL DATA

The Company collects your Personal Data for the following purposes:

- To enable you to use our Website and the Services advertised thereon and/or provided through it, to register an account or profile, to process information you provide via our Website (including verifying that your email address is active and valid);
- To detect and prevent potentially prohibited or illegal activity relating to the Company's services;
- To tailor content, recommendations, and advertisements that we and third parties display to you on the Website and elsewhere online;
- To contact you in response to your inquiries, comments, and suggestions;
- With your consent, to provide you with information, products, or services that we otherwise believe will interest you, including special opportunities from us and our third-party partners;
- To contact you with administrative communications and, in our discretion, changes to our Privacy Policy, Terms of Use, or any of our other policies;
- For internal business purposes, such as to improve our Website;
- To issue invoices and collect fees;
- To comply with our policies and obligations, including, but not limited to, disclosures and responses in response to any requests from law enforcement authorities and/or regulators in accordance with any applicable law, rule, regulation, judicial, or governmental order.

Your Personal Data, whether public or private, will not be sold, exchanged, transferred, or given to any other company for any reason whatsoever, without your consent, other than for the purpose of delivering the requested services and improving our services.

PROVIDING YOUR PERSONAL DATA TO OTHERS

As a general principle, we collect and process Personal Data in order to facilitate or improve the Company's services or offers. We do not sell your Personal Data or share it with third parties, except to the extent stated in this Privacy Policy.

For behavior statistics and business intelligence, we use the services of Google LLC ("Google Analytics"), a company located in the United States. Your Personal Data that we may provide to Google Analytics may include your IP address, and that data is used by Google Analytics to generate information about your usage of our service.

We may share your Personal Data with the following third parties:

- Third-party vendors providing services on our behalf, including advertising, analytics, research, customer service, service support, data storage, validation, security, fraud prevention, and legal services. Such third-party vendors have access to perform these services but are prohibited from using your Personal Data for any other purpose;
- Law enforcement bodies and other external parties (including but not limited to authorities that stop financial crime, money laundering, terrorism, and tax evasion; the police, courts, or other dispute resolution bodies; banks and other financial institutions for the purposes of fraud investigations, etc.) where such disclosure is necessary for

compliance with a legal obligation to which we are subject, or in order to protect your vital interests and/or the vital interests of a third-party;

- Other third parties subject to your consent.

When we disclose your Personal Data to a third party, we take all reasonable steps to ensure that those third parties are bound by confidentiality and privacy obligations with respect to the protection of your Personal Data. The disclosure is conducted in compliance with legal requirements, including entering into data processing agreements with the relevant third parties, to ensure that Personal Data is only processed in accordance with our instructions, applicable laws and regulations, and for the purpose specified by us, and to ensure adequate security measures.

STORAGE AND DELETION OF PERSONAL DATA

The Company will retain your Personal Data for as long as we deem necessary to enable you to use the Website and to provide Services to you, to comply with applicable laws (including those regarding document retention), resolve disputes with any parties, and otherwise as necessary to allow us to conduct our business.

The legal basis for retaining your Personal Data is the Company's legitimate interest to protect our rights in light of potential legal disputes during the limitation period under the law.

If we have collected your Personal Data in relation to your inquiry to us, we retain your Personal Data for up to three (3) years from collection, unless otherwise provided by this Privacy Policy.

Notwithstanding anything to the contrary in this Section, we may retain your Personal Data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

When the Company no longer needs to keep your Personal Data, it will securely delete or destroy it.

PROTECTION OF PERSONAL DATA

Your Personal Data's integrity is of high concern to us. We follow standard practices within the industry to protect the Personal Data that we collect and maintain, including using Transport Layer Security (TLS) to encrypt information as it travels over the internet. We have therefore implemented technology and security policies and procedures intended to reduce the risk of accidental destruction or loss, or the unauthorized disclosure or access to, such information, reasonably appropriate to the nature of the data concerned; unfortunately, however, no data transmission over the Internet can be guaranteed to be 100% secure. We implemented a number of additional security measures to ensure that your Personal Data is not lost, abused, or altered, including, but not limited to:

- **Physical measures**, which means that materials containing your Personal Data will be stored in a locked place.

- **Electronic measures**, which means that computer data containing your Personal Data will be stored in the computer systems and storage media that are subject to strict log-in restrictions.
- **Management measures**, which means that only authorized employees are permitted to come into contact with your Personal Data, and such employees must comply with our internal confidentiality rules for Personal Data. We have also imposed strict physical access controls to buildings and files.
- **Technical measures**.

If you suspect that your Personal Data has been compromised, please immediately contact our Customer Support Team at info@ubasgroup.com.

USER'S RIGHTS

Users residing in certain countries, including the EU, are afforded certain rights regarding their personal information:

- **The right to access:** You have the right to confirmation as to whether or not we process your Personal Data and, where we do, to access the Personal Data. Provided that the rights and freedoms of others are not affected, we will supply to you a copy of your Personal Data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee;
- **The right to object to processing:** You have the right to object to us processing your Personal Data, citing personal reasons; however, understand that we may still process your Personal Data if we have lawful grounds to do so, but only if our interests in processing your Personal Data are not overridden by your rights, interests, or freedoms;
- **The right to rectification:** You have the right to have any inaccurate Personal Data about you rectified and, taking into account the purposes of the processing, to have any incomplete Personal Data about you completed;
- **The right to data portability:** You have the right to obtain and reuse your Personal Data for your own purposes across different services. It allows you to move, copy or transfer Personal Data easily from one IT environment to another in a safe and secure way, without hindrance to usability;
- **The right to erasure:** You have the right to request that the Company erase your Personal Data under certain conditions. However, this can sometimes be a limited right where our other duties prevent us from doing so. For example, if you asked us to delete your identity and transaction data, we would not be able to do this, as we have a legal duty to keep it under anti-money laundering and counter-terrorism financing regulations;
- **The right to restrict processing:** You have the right to request that the Company restrict the processing of your Personal Data under certain conditions;
- **The right to withdraw consent:** To the extent that the legal basis for our processing of your Personal Data is consent, you have the right to withdraw that consent at any time. However, withdrawal will not affect the lawfulness of processing of your Personal Data before the withdrawal.

You may exercise any of your rights in relation to your Personal Data by contacting our Customer Support at info@ubasgroup.com. You must note that prior to accessing and making changes to your Personal Data, we will need to verify your identity properly.

We will aim to respond to your requests regarding your Personal Data within 1 (one) month of receipt of any such request.

If you believe that your rights have been infringed, you may lodge a complaint with the supervisory authority in your jurisdiction. In Hong Kong, you can make an enquiry or file a complaint with the Privacy Commissioner for Personal Data.

INTERNATIONAL TRANSFER OF PERSONAL DATA

We may need to transfer your Personal Data to countries which are located outside the European Economic Area (“EEA”), for the purpose of providing the Services to you. You may be located in a country outside of the EEA and therefore we may have no choice but to transfer your Personal Data outside of the EEA.

Any transfer of your personal information outside of the EEA will be subject to a GDPR-compliant guarantee (such as Model Contract Clause approved by the European Commission) that will safeguard your privacy rights and give you remedies in the unlikely event of a security breach.

COOKIES POLICY

We use cookies and similar technologies like pixels, tags, and other identifiers in order to remember your preferences, to understand how our Website is used, and to customize our marketing offerings.

A cookie is a small data file containing a string of characters that is sent to your computer when you visit a website. When you visit the websites again, the cookie allows that site to recognize your browser. The length of time a cookie will stay on your computer or mobile device depends on whether it is a “persistent” or “session” cookie. For further information regarding cookies, visit allaboutcookies.org.

We use the following types of cookies on our Website:

- **Strictly necessary cookies:** These are essential for you to browse our Website and use its features. Without these cookies, some online services cannot be provided.
- **Performance cookies:** These collect information about how you use our Website. This data may be used to help optimize our Website and make it easier for you to navigate.
- **Functional cookies:** These allow our Website to remember the choices you make while browsing the Website and to personalize your experience.
- **Third-party cookies:** These are placed by websites and/or parties other than us. These cookies may be used on our Website to improve our services or to help us provide more relevant advertising. These cookies are subject to the respective privacy policies for the relevant external services.
- **Analytics cookies:** These are offered by services like Google Analytics, to help us understand how long a visitor stays on our Website, what pages they find most useful, and how they arrived at <https://ubasgroup.com>.

Most web browsers allow you to control cookies through their settings preferences.

Additionally, when you visit our Website for the first time, you will see our Cookie Banner and, if you click on Cookies Settings, you can set your preferences regarding the use of cookies when browsing through our Website. However, you should note that if you limit the ability of our Website to set cookies, this may impair your overall user experience and limit the Website functionality, as the Website will no longer be personalized to you.

In addition to cookies, we sometimes use small graphics images known as pixels (also known as web beacons, clear GIFs, or pixel tags). We use pixels in our email communications to you

(if you have selected to receive such communications) to help us to understand whether our email communication has been viewed. We also use third-party pixels (such as those from Google, YouTube, and other networks) to help us provide advertising that is relevant to your interests.

CHANGES TO THE PRIVACY POLICY

We may update this Privacy Policy from time to time and we encourage you to periodically review this page. If we make any material changes in the way we collect, use, and/or share your Personal Data, we will notify you by posting notice of the changes in a clear and conspicuous manner on the Website at <https://ubasgroup.com>.

CONTACT INFORMATION

Should you have any questions regarding this Privacy Policy, please do not hesitate to contact us at info@ubasgroup.com.