

Privacy Policy

1. We respect privacy

- 1.1 Universal Pocket (H.K.) Co. Limited. Hong Kong Business Registration Certificate No. 67304380-000-02-17-4 (“We”, “Us”, “Our”) respects the right to privacy and is committed to safeguarding the privacy of our customers and our website visitors. We adhere to the Hong Kong privacy principles and other obligations set in the Personal Data (Privacy) Ordinance (Cap. 486). This policy sets out how we collect and treat personal information.
- 1.2 “Personal data” is information we hold which is identifiable as being about an individual.
- 1.3 This policy governs our treatment of personal data, including data that we gather when you access or use any online service location that posts a link to this Privacy Policy and also applies to your use of our website, software applications including Unipay (“Software”), products and services (collectively, the “Services”), but not to the practices of companies we don’t own or control, or people that we don’t manage. We gather various types of data from our users, and we use these data for you to interact with our Software and Services, including to personalize, provide, and improve our Software and Services, to allow you to set up a user account and profile, to contact you and allow other users to contact you, to fulfill your requests for certain products and services, and to analyze how you use the Software and Services. In certain cases, we may also share some personal data with third parties.

2. Collection of personal information

- 2.1 We will, from time to time, collect, receive and store personal information provided via the website, Software or in the course of our Services, from you, provided to us directly or given to us in other forms.
- 2.2 You may provide basic information such as your name, phone number, address, and email address to us directly, to enable us to send information, provide updates and process a product or service order. We may collect additional information at other times, including but not limited to, when you provide feedback, or when you provide information about your personal or business affairs, change content or email preferences, respond to surveys and/or promotions or provide financial or bank account information.
- 2.3 You may have the option of registering an account and logging into or otherwise linking to that account using a third-party account such as WeChat, Alipay, Facebook, Google or other account provided by a third-party site or application. If you choose to provide or log into your account using your credentials for a third-party platform we may have access to certain information from that site, such as your name, contacts or friend’s lists, account information, public profile, and email address. Consequently, if you provide your third-party account credentials, you acknowledge that this information, as well as other information for that account (collectively, “Third-Party Account Information”) may be replicated into your Unipay account if you authorize such data transfer. You further acknowledge that Third-Party Account Information transmitted to us is governed by this Privacy Policy.

3. What kind of personal information do we collect?

- 3.1 The types of personal information we may collect include:
 - (a) identifying information such as name, date of birth, and ID card number;
 - (b) contact information such as office address, office and mobile phone numbers, and email address;
 - (c) financial information;
 - (d) third party account credentials (such as WeChat, Alipay, social media and Google account information);
 - (e) physical location;
 - (f) IP addresses; and
 - (g) photos

- 3.2 You generally have the right not to identify yourself when dealing with us where it is lawful and practicable for us to allow it. However, on many occasions we will not be able to do this, and provide our Software and Services to you.

4. How do we collect personal information?

- 4.1 We collect personal information in a variety of ways, including when you interact with us electronically, when you access our Software or website and when we provide our Software and Services. We may receive personal information from third parties. If we do, we will protect it as set out in this Privacy Policy. We collect information that you provide directly to us or via third parties. For instance, during the registration process (or when you update your account) you provide us with personal information such as your first and last name, email address, telephone number, and at your option, your social media platform credentials.
- 4.2 Additionally, there may be instances where you find it necessary to communicate directly with us or where you have provided us with the means to communicate with you. For example, if you have given us your email address, we may send promotional email offers to you, notify you of any changes to the terms and conditions of the Software and Services, or email you about your use of the Software and Services. Also, we may receive data when you open an email from us or use our Software and Services, including your contacts information. If set out in the Personal Data (Privacy) Ordinance then you will be able to opt out of receiving email marketing communications from us by the available unsubscribe functionality. Please note, however, that you may be unable to opt out of some administrative communications that are reasonably necessary to the Software and Services, such as an order confirmation or service notifications

5. Use of personal information

- 5.1 We may use personal information to provide you with information, updates, and our Software and Services. We may also make you aware of new and additional products, services and opportunities available to you, provided by us, our partners, and service providers. We may use personal information to improve our product, Software and Services and better understand individual and customer needs.
- 5.2 We may contact you by a variety of measures including, but not limited to telephone, email, SMS, or mail.
- 5.3 We may also use your personal information to assist in the resolution of disputes between users of our Software and Services.

6. Disclosure of personal information

- 6.1 We may disclose your personal information to any of our employees, officers, insurers, partners, contractual counterparties, professional advisers, agents, suppliers, customers, users or subcontractors insofar as reasonably necessary for the purposes set out in this Policy. Personal information may be supplied to a third-party when it is required for the delivery of our Software and Services, for dispute resolution or for marketing purposes.
- 6.2 We may from time to time need to disclose personal information to comply with a legal requirement, such as a law, regulation, court order, subpoena, warrant, in the course of a legal proceeding or in response to a law enforcement agency request.
- 6.3 We may also use personal information to protect our copyright, trademarks, legal rights, property or safety, and that of our customers or third parties.
- 6.4 If we provide personal information of other users to you for the purposes of resolving disputes, you acknowledge and agree that such information will be used only for the purpose of resolving the dispute (and no other purpose) and that you will indemnify us against any claims relating to any other use of information not permitted by this policy.

- 6.5 Information that we collect may from time to time be stored, processed in or transferred between parties located in countries outside of Hong Kong SAR. It is not practicable to list all the countries in which the information we collect may be located, but these may include the United States, the United Kingdom, Australia, New Zealand, and the rest parts of People's Republic of China.
- 6.6 If there is a proposed or actual change of control in our business or a sale or transfer of business assets, we reserve the right to transfer to the extent permissible at law our user databases, together with any personal information and non-personal information contained in those databases. This information may be disclosed to a potential purchaser under an agreement to maintain confidentiality. We would seek to only disclose information in good faith and where required by any of the above circumstances.
- 6.7 By providing us with personal information, you consent to the terms of this Privacy Policy and the types of disclosure covered by this Policy. Where we disclose personal information to third parties, we will request that the third party follow this Policy regarding handling of personal information.
- 6.8 If we provide a facility for communication between users of the Software or Services, certain user profile information, including your username, phone number, location, and any image content that such user has uploaded to the Software, may be displayed to other users to facilitate user interaction within the Software or Services or address your request for our Software and Services. Please remember that any content you upload to your public user profile, along with any Personal Information or content that you voluntarily disclose online in a manner other users can view (in messages etc.) becomes publicly available, and can be collected and used by anyone. Your user name may also be displayed to other users if and when you send messages or comments or upload images or products through the Software and Services and other users can contact you through messages and comments.

7. Security of personal information

We are committed to ensuring that personal information provided to us is secure. In order to prevent unauthorized access or disclosure, we have put in place suitable physical, electronic, and managerial procedures to safeguard and secure information and protect it from misuse, interference, loss and unauthorized access, modification and disclosure. Although we take measures to safeguard against unauthorized disclosures of information, we cannot provide an assurance that in all cases personal information that we collect will not be disclosed in a manner that is inconsistent with this Privacy Policy.

8. Access to personal information

- 8.1 You may request details of personal information that we hold about you in accordance with the provisions of the Personal Data (Privacy) Ordinance (Cap. 486). A small administrative fee may be payable for the provision of information. If you are seeking a copy of the information that we hold about you or you believe that any information we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, you may email us at info@unipock.com or phone us at +852 53718008.
- 8.2 We reserve the right to refuse to provide you with information that we hold about you, in certain circumstances set out in the Personal Data (Privacy) Ordinance.

9. Complaints about privacy

If you have any complaints about our privacy practices, addressed your concerns to: info@unipock.com. We take complaints very seriously and will respond shortly after receiving written notice of your complaint.

10. Changes to Privacy Policy

Please be aware that we may change this Privacy Policy in the future. We may modify this Policy at any time, in our sole discretion and all modifications will be effective immediately upon our posting of the modifications on our Software or website. Please check back from time to time to review our Privacy Policy.

11. Website

- 11.1 When a user visits our website www.unipock.com and www.unipock.net, we may collect certain information such as browser type, operating system, website visited immediately before coming to our site, etc. This information is used in an aggregated manner to analyze how users use our site, such that we can improve our Services.
- 11.2 We may from time to time use cookies on our website. Cookies are very small files which a website uses to identify users when a user comes back to the site and to store details about that user's use of the site. Cookies are not malicious programs that access or damage a user's computer. Most web browsers automatically accept cookies but a user can choose to reject cookies by changing the browser settings. However, this may prevent a user from taking full advantage of our website.
- 11.3 Our website may from time to time use cookies to analyze website traffic and help us provide a better website visitor experience. In addition, cookies may be used to serve relevant advertising to website visitors through third parties.
- 11.4 When you access our Services via your mobile device or computer, we may automatically collect information about your device or computer, including unique device identifiers (e.g., IMEI number, serial number, etc.), operating system, hardware model, etc.
- 11.5 Our website may from time to time have links to other websites not owned or controlled by us. These links are meant for users' convenience only. Links to third party websites do not constitute sponsorship, endorsement or approval of these websites. Please be aware that we are not responsible for the privacy practices of other such websites. We encourage users to be aware, when they leave our website, to read the privacy statements of each and every website that collects personal identifiable information.