

## Privacy Policy

1. The Caravel Group Limited and its subsidiaries, affiliates and associated companies, are hereinafter called “**The Caravel Group**” (or “**us**”, “**we**” or “**our**”). The Caravel Group is headquartered at 21st Floor, Central Plaza, 18 Harbour Road, Wanchai, Hong Kong.
2. This privacy policy explains what data may be collected by us including via our website at <https://www.caravel-group.com/privacy> (“**Website**”) or other means, what is the purpose and how this data will be processed. It also explains your rights in relation to your personal data and how to contact us in the event you have a complaint. **By visiting the site, you are acknowledging and accepting this Privacy Policy.** In the event of any changes to our Privacy Policy, whether required by law or otherwise, we shall post such changes on our Website or notify you via other means. Your continued use of the Website or our services or otherwise your continued dealing with us after changes have been posted to the Privacy Policy will constitute your acceptance of such changes.
3. All capitalised terms not otherwise defined in this Privacy Policy shall have the meanings ascribed to them in the Terms of this Website.
4. We respect the privacy of individuals and of the personal data collected in the course of our business operations. We are committed to complying with the Personal Data (Privacy) Ordinance (Cap. 486) of the Hong Kong SAR, details of which can be found at the website of the Privacy Commissioner. We have updated this Privacy Policy with the aim of complying with the EU General Data Protection Regulation (Regulation (EU)2016/679) (“**GDPR**”) and the Personal Information Protection Law of the People’s Republic of China (“**PIPL**”), always only to the extent of their applicability to us.
5. Where The Caravel Group controls how your personal data is collected and the purposes for which we use your personal data, The Caravel Group will act as the “data controller” for the purposes of the GDPR (or also known as a “personal information processor” under the PIPL).

## Collection of Personal Data

6. Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We obtain Personal Data which you disclose to us, both online and offline, such as when you:
  - (a) Visit our websites and/or complete one of our web forms;
  - (b) Visit our premises;
  - (c) Receive our products and/or services which you requested; or
  - (d) Communicate with us via any means and for any purpose, including but not limited to telephone, and through the use of networking websites, third party applications or similar technologies.
7. We may also collect information from third-party sources such as sub-contractors. In certain instances, your employers may provide us with your information.

8. Some of our offices may have also installed CCTV cameras which may capture and collect video footages or images of you.

### **Nature of Personal Data**

#### **9. From our clients (including potential clients) as well as other counterparties (including potential counterparties) such as vendors, agents, service providers:**

The information that we may collect and hold about third parties includes:

- (a) Identifying Data: name, surname, job title.
- (b) Contact Data: telephone number, physical address, email address, your company contact data and any other similar data.
- (c) Financial Data: banking information, VAT number, details about payments to and from clients/potential clients and other accounting details.
- (d) Our correspondence with you: this includes any feedback, enquiries, complaints and comments from clients/potential clients via telephone, email or social media, or records of any online, paper or in-person correspondence and interactions between us.
- (e) Voluntary information: other types of information that counterparties may voluntarily choose to provide to us.

#### **10. From the users of our Website:**

The information that we may collect and hold about users of our Website include:

- (a) Technical Data: Including the IP address used to connect your computer to the Internet, your browser type and version, the full Uniform Resource Locators (URL), clickstream to, through and from our Website (including date and time) as well as other information regarding your experience on our Website such as page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page.
- (b) Location Data: We may receive information about your location. We may determine your location through your IP address and, when accessing the Website through a mobile device, by using the data that we collect from this device. This includes information about the wireless networks or cell towers near your mobile device at the time of access. Our Website uses cookies to distinguish you from other users of our Website. This helps ensure that we provide you with a customized and good experience when you browse our Website and also allows us to improve our Website. You may, if you wish, set your web browser to reject cookies or to require confirmation from you before accepting them, and may delete existing cookies.

We shall use the information obtained from the website to administer our Website and for internal operations, including troubleshooting and in order to keep our Website safe and secure to improve our Website to ensure that content is presented in the most effective manner for you and to ensure that content displayed on the Website is presented in a user-friendly manner.

\*We do not generally collect sensitive information unless it is volunteered by you or unless we are required to do so, pursuant to applicable laws or regulations.

\*We collect and process data of minors only when consent is given or authorised by the holder of parental responsibility over the minor.

## **11. From potential employees:**

We collect personal data from candidates for recruitment purposes. Failure to provide the mandatory personal data may influence the processing and outcome of their job application.

The information that we may collect and hold about candidates includes:

- (a) Name, surname, address, telephone number(s) and email address
- (b) Details of qualifications, skills, experience, employment history and LinkedIn profile
- (c) Any additional information contained in a candidate's CV such as referee information disclosed at interview or otherwise provided to us during the recruitment process.

We may ask for other personal data (including special categories of data and criminal records) during the candidate's application or after we've made an offer, we will explain (often verbally) why and how it will be processed when it is requested.

We need to process data to decide whether to enter into a contract of employment with a particular candidate and may also process certain data to ensure that we are complying with our legal obligations. We have legitimate interest in processing personal data during the recruitment process and in keeping records of the process in order to manage the recruitment process. Such data is required to assess and confirm a candidate's suitability for employment and decide to whom to offer a particular role. We may also need to process candidate's data to respond to and defend itself against legal claims.

We may also contact the previous employers named by that candidate as referees for the purpose of obtaining employment references.

## **Data Accuracy**

- 12.** It is important that the data that we hold about you is accurate and up to date. In the event that your data changes please notify us so that we can update our records.

## **Purpose of processing**

- 13.** Any personal data submitted to us either in enquiries through this Website, by email or by other means provided via the Website or otherwise, will be collected, used, stored and processed by us only for the purposes of:

- (a) providing requested information on our products, services, pricing and processes;
- (b) establishing and maintaining contracts;

- (c) provision of or availing of contracted services;
- (d) invoicing, remittance, payments, collections;
- (e) maintaining and improving our Website;
- (f) providing requested services to you;
- (g) marketing purpose;
- (h) IT support services;
- (i) business continuity planning;
- (j) employment-related processing;
- (k) conducting due diligence checks to minimise risks or frauds;
- (l) necessary for our legitimate interest wherein we have a business or commercial reason for to use your information; or
- (m) complying with our obligations under applicable laws and regulations.

### **Marketing purposes**

- 14. We may process your personal data for direct marketing purposes. For example, we may send you marketing communications and news concerning The Caravel Group's services, event invitations and our company newsletter. You will only receive marketing communication from us if you have opt-in of receiving marketing material.
- 15. We respect if you do not want your personal data to be processed for direct marketing purposes and you can always inform us about this as per the section "Contact Us" found below or clicking on the opt-out link included in each marketing message. As soon as you notify us, your personal data will no longer be processed for marketing purposes.

### **Legal basis**

- 16. We process your personal data on the following legal basis (to the extent relevant under applicable laws):
  - (a) It is necessary for us to comply with our legal obligations;
  - (b) Performance of a contract with you: the processing is necessary either due to a contract we have with you, or because we have asked you to take specific steps before entering into a contract.
  - (c) It is necessary for our legitimate interests, except where your interest and rights override those;
  - (d) It is necessary to protect your interests or those of someone else; and/or
  - (e) Consent: In case where you have given a clear consent for us to process your personal data for a specific purpose. For EU/EEA residents we do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you, processing personal data of minors and use of cookies by our website or otherwise permitted by applicable data protection laws.

You have the right to withdraw consent at any time by contacting us. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent or if consent was not the basis of processing your information. If you withdraw your consent, we may not be able to provide certain products or services to you.

## **Storage, transfer and sharing**

17. Your personal data collected by The Caravel Group may be transferred to, and stored and processed in, any country in which we or subsidiaries, affiliates or our associated third parties maintain facilities in order to carry out the purposes listed under paragraph 13 above. Such subsidiaries, affiliates or associated third parties should only keep your personal data for so long as is necessary to fulfil the relevant purposes set out in paragraph 13 above, unless a longer retention period is required under applicable law.
18. Given the international nature of The Caravel Group's operations, personal data may be transferred to countries outside the country of residence of the data subject. We take reasonable measures to safeguard the transfer of the personal data to third parties in a manner that complies with the applicable data protection laws.
19. We may disclose your Personal Data to third parties under the following circumstances in order to carry out the purposes listed under paragraph 13 above:
  - (a) if we sell, merge or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
  - (b) if The Caravel Group or substantially all of its assets are acquired by a third party, in which case Personal data held by it about its customers will be transferred to the acquiring third party;
  - (c) any outsourced service provider or professional advisor of The Caravel Group;
  - (d) as otherwise necessary, required or permitted by law or due to a request from a competent court, regulator or other authority;
  - (e) any government or law enforcement authority or agency, or in good faith to any other parties that the disclosure is necessary or advisable including and without limitation to protect The Caravel Group's rights or properties; and
  - (f) any other person whom The Caravel Group considers appropriate to make a transfer in connection with the purposes set out in paragraph 13 above.

When using the services of any third party, The Caravel Group enquires if the third party will provide suitable technical and organisational measures to protect the personal data as required by the applicable law.

## **Retention**

20. We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for. We will only store data for as long as is required to fulfil that purpose, or for the purpose of satisfying legal, tax, accounting or reporting requirements and as per the local laws of the country we operate in. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use and/or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and also the applicable legal requirements.

## **Security**

21. We take the security of your information seriously. We will take all practicable steps, including the implementation of technical and physical security measures, to ensure that all personal data held by us is kept secure and safe from any loss or unauthorised disclosure, use and modification.
22. The security practices adopted by us include regular review of permissions and account access, as well as change, incident, risk, and problem processes to prevent and resolve issues. Security frameworks used by us for guidance are ISO27001 and National Institute of Standards and Technology.
23. We enquire about the appropriate security certifications from our Cloud and IT vendors.

## **Your legal rights**

24. The GDPR and the PIPL grant EU and PRC subjects respectively certain legal rights, a summary of which is set forth below:
  - (a) The right to access
  - (b) The right to rectification
  - (c) The right to erasure
  - (d) The right to restrict processing
  - (e) The right to object to processing
  - (f) The right to data portability
  - (g) The right to complain to a supervisory authority
  - (h) The right to withdraw consent

## **Failure to provide personal information**

25. Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you or we may not be able to perform the services as agreed. In case you fail to provide the required data, we may have to terminate that contract with you as a result, but we will notify you if this is the case at the time.

## **Contact us**

26. If you have any questions on how we collect and treat personal data (including any complaints that you may have in relation to our handling of your personal data) or would like to exercise any of the abovementioned rights, please send your inquiries to: [privacy@caravel-group.com](mailto:privacy@caravel-group.com). Singapore data subjects may contact our DPO for Singapore too on this email address.
27. This Privacy Policy applies solely to us, and we accept no responsibility for the privacy practices of any other website. Please be aware of this when clicking on links to third party websites (if any) from our site.

**Jurisdiction**

28. All matters relating to this website are governed by the laws of Hong Kong.