

## PARKLU Website Privacy Policy

This Privacy Policy is aimed at illustrating the means and purposes of the processing of personal data carried out by Park Lu Limited, having its registered office in Suite D, 8/F, High Block, H Code, 45 Pottinger Street, Central, Hong Kong, in its quality of data controller (hereinafter the Park Lu or "**Controller**", or "**us**", "**we**"), through the website <https://www.parklu.com/> (hereinafter the "**Website**").

Please note that this Privacy Policy is applicable to anyone who accesses and visits the Website or otherwise interacts with the web services offered on the Website (the "**User**" or "**you**", "**your**").

For the purpose of this Privacy Policy, "**Data Protection Laws**" means applicable data protection, direct marketing, e-commerce, data security, consumer protection and other laws that pertain to the processing of Data (including without limitation the PRC CyberSecurity Law) and corresponding measures, regulations, guidelines and rules issued from time to time by the regulatory authorities pursuant to or in connection therewith.

The processing of the Personal Data carried out by Park Lu. for the development and management of the Website, as well as to provide Park Lu Services ("**Services**") will be based on the principles of lawfulness, fairness, transparency, purpose limitation, data minimization, accuracy, storage limitation, integrity and accountability.

Any term indicated in capital letters shall have the meaning attributed to it within the applicable Data Protection Laws, or otherwise provided hereto.

### **Data Controller**

The data Controller will be Park Lu ([privacy@parklu.com](mailto:privacy@parklu.com)).

Please note that Park Lu is an affiliated company to the [Launchmetrics group](#).

### **Which kind of Personal Data are collected**

#### *Traffic and Internet data*

The computer systems and software procedures used to operate the Website acquire, during their normal operation, some Personal Data whose transmission is implicit in the use of Internet communication protocols.

This category of data includes, among others, IP addresses, browser type, operating system, the domain name and website addresses from which the User logs in or out, the information on pages visited by User within the Website, the time of access, time period of User's staying on a single page, the internal path analysis and other parameters regarding the User's OS and computer environment.

These technical / IT data are collected and used only in an aggregated and not immediately identifiable manner. They could be used to ascertain responsibilities in case of breach of this Privacy Policy or the terms of the Website, or upon public authorities' request.

In order to consent to the collection of this category of data, the Website uses cookies. Please, read the [Cookies Policy](#) of this Website for any further information.

#### *Personal data provided by the User*

We may ask you to provide us with Personal Data such as your first name, last name, address, and e-mail address, in the contact form published on the Website, or to subscribe to our newsletter.

For the purposes of providing you our Services, at the moment of your subscription, as well as during our contractual relationship, we will process your Personal Data to the extent necessary to comply with our contractual obligations entered with you. For additional information please make reference to Park Lu Services Privacy Notice.

### **Why Personal Data are processed and Lawful basis**

The Cyber security law in the Peoples' Republic of China, and European Union General Data Protection Regulation ("GDPR") where applicable, allows us to process personal information, so long as we have a ground under the law to do so. It also requires us to tell you what those grounds are. As a result, when we process your Personal Data, we will rely on one of the following processing conditions exclusively for the following purposes, to:

- o fulfil any request made by the User through the [contact form](#) available on the Website. This processing enables us to provide the Users with the requested information, providing a free and informed consent;
- o send to subscribed Users the Park Lu newsletter, provided that they granted their consent to receive it;
- o send marketing communications, provided that Users granted their consent to receive it;
- o comply with obligations set forth by applicable laws and regulations and to ascertain responsibilities in case of any computer crimes against the Website. As this processing is mandatory by law, User's consent is not required.

## Cookies

Our Website uses cookies. Further information on the use of cookies may be found [here](#).

## How long do we keep your Personal Data

The Controller only keeps your Personal Data for the time necessary to fulfil the purposes for which the Data have been originally collected (such as: answer User requests, distribute the newsletter, provide the subscribed Services).

## How Personal Data are secured

Personal Data may be processed through information technology tools electronically, but always under technical and organizational measures that enable ensuring their security and confidentiality, especially for the purposes of preventing any risk arising from accidental or unlawful destruction, loss, alteration, unauthorized disclosure of or access to personal data. All the processing operations as well as the security measures implemented took into consideration the risk of the processing and of the nature of the Personal Data.

Organisational measures include restricting access to the Personal Data solely to authorised persons or third parties where duly authorized and instructed by the Controller for the purposes of processing operation, and according to the 'need to know' principle. Such authorised persons or third parties comply with relevant applicable laws, and when additionally required, confidentiality agreements

## Who may access Personal Data

As a general principle, your Personal Data will be shared and made available or otherwise processed in strict compliance with the principle of the "need to know". Unless we received your specific consent or as otherwise required by applicable laws, your Personal Data shall not be shared with any other organizations.

Without prejudice to the above, your Personal Data might be shared with:

- **Entities affiliated to Park Lu**, which, may act as data processor or joint-controllers together with Park Lu, pursuant to applicable Data Protection Laws;
- **Analytical services**. We use certain analytics providers (including but not limited to Google Analytics, Hubspot and Mixpanel) in order to better understand how the Website is used and how it can be improved. Your IP address information may be accessed by one or more of such analytics providers. In addition, information regarding the usage activity of a certain portion of users of the Website may be shared, but such information is shared on an anonymous basis and does not reveal the identity of any individual User. These providers do not collect any personal data or store IP address locally on their websites;
- **Service provider**. We might share your Personal Data with our service providers for the purposes of managing your requests/interactions with the Website. In particular, we use Google Cloud as a website provider, and the servers made available to us to manage the Website are located in Hong Kong. We also use Mailigen as a provider to distribute our newsletter.
- **Agents**. We employ and contract with people and other entities that perform certain tasks on our behalf and who are under our control (our "Agents"). We may need to share Personal Data with our Agents in order to provide products or Services to you. Unless we tell you differently, our Agents do not have any right to use Personal Data or other information we share with them beyond what is necessary to assist us. You hereby consent to our sharing of Personal Data with our Agents;
- **Potential business partner**. In some cases, we may choose to buy or sell assets. In these types of transactions, user information is typically one of the transferred business assets. Moreover, if we, or substantially all of our assets, were acquired, or if we go out of business or enter bankruptcy, user information would be one of the assets that is transferred or acquired by a third party. You acknowledge that such transfers may occur, and that any acquirer of us or our assets may continue to use your Personal Data as set forth in this Policy.

- **Social Media Features.** Our Services include certain Social Media features, widgets, and single sign on features, such as the WeComm, WeChat Mini Programs, and WeChat Service Accounts, or other interactive mini-programs ("Social Media Features"). These Social Media Features may collect certain Personal Information such as your IP address or which page you are visiting on our Website and may set a cookie to enable them to function properly. Social Media Features are either hosted by a third party or hosted directly on our Website. Your interactions with these third parties' Social Media Features are governed by the policies of such third parties only.

Please consider that we reserve the right to access, read, preserve, and disclose any information as it reasonably believes is necessary to (i) satisfy any applicable Data Protection Laws, regulation, legal process or governmental request, (ii) enforce this Privacy Policy, including investigation of potential violations hereof, (iii) detect, prevent, or otherwise address fraud, security or technical issues, (iv) respond to user support requests, or (v) protect our rights, property or safety, our users and the public. This includes exchanging information with other companies and organizations for fraud protection and spam/malware prevention.

### **Data Transfer**

Park Lu is a [Launchmetrics](#) affiliated company, which is a global organization. As such, Park Lu may process information about you within the Launchmetrics Group and with its affiliates, and transfer it to countries in the world where we do business in connection with the uses identified above and in accordance with this Privacy Policy.

In some cases, we use suppliers located in various countries to collect, use, analyse, and otherwise process information on its behalf. It is our practice to require such suppliers to handle information in a manner consistent with our policies and applicable laws. As a general statement, we commit to comply with any other legal requirements provided under any applicable Data Protection Law to transfer Personal Data to third countries.

Without prejudice to the above, Your Personal Data will be stored, and processed in China (including Hong Kong), and may be transferred to and processed in other jurisdictions. Before performing any of the proposed transfers we will comply with all the necessary requirements as set forth within the Applicable Data Protection Laws to lawfully transfer User Personal Information across jurisdictions, in particular:

- Chinese data protection laws. By using the Website, or subscribing or contacting us through the Website channels, you hereby grant your consent to transfer your Personal Data outside Chinese jurisdiction.
- Singapore data protection laws. Pursuant to article 10 of the Personal Data Protection Regulation 2021, by using the Website, or subscribing or contacting us through the Website channels you hereby grant your consent to transfer your Personal Data outside Singapore jurisdiction. Moreover, please consider that pursuant to articles 10 and 11 of the Personal Data Protection Regulation 2021 we took the appropriate steps to ascertain whether, and to ensure that, the recipient of your Personal Information is bound by legally enforceable obligations by executing a contract.
- GDPR, or UK GDPR. We are making sure that any of these transfers are supported by the strict legal compliance of our suppliers to the GDPR or to UK GDPR. As applicable we will rely on European Commission Adequacy Decisions, or a UK Adequacy Regulation, or Standard Contractual Clauses (also called Model Clauses) to meet the GDPR/UK GDPR requirements. When necessary, compliance can be achieved if suppliers use an approved certification mechanism.

### **Redirection to other websites**

The Website incorporates links and QR Codes ([WeChat](#)) which allow the User to connect to other websites run by third parties. The Controller assumes no responsibility regarding the processing of personal data which may take place through and/or in connection with third-parties' websites.

Therefore, each User who accesses such web pages and/or social media platforms through the Website must carefully read the relevant privacy policies in order to better understand how their personal data will be processed by the third parties which, as autonomous controllers, will provide and manage such websites.

### **Your rights**

Users have a number of rights concerning the Personal Data that the Controller holds about them. A User can exercise any of these rights, by using the contact details set out below.

- **The right to be informed.** Users have the right to be provided with clear, transparent and easily understandable information about how the Controller uses their information and about their rights (as intended with the details provided by this Privacy Policy).
- **The right of access.** Users have the right to obtain access to their Personal Data subject to the data Processing. This will enable Users, for example, to check that the Controller is using Users' Personal Data in accordance with the relevant data protection law. Users may access the information the Controller holds about them in this way, using the Contact information section).
- **The right to rectification.** Users are entitled to have their Personal Data corrected if it is inaccurate or incomplete. Users can request that the Controller rectifies any errors in information that the Controller holds.
- **The right to erasure.** Also known as 'the right to be forgotten, it enables Users to request the deletion or removal of certain of the Personal Data that the Controller holds about Users by contacting the Controller (please see the Contact information section below). Pursuant to applicable laws the Controller may not have all Users' Personal Data erased.
- **The right to restrict processing.** Users have rights to 'block' or 'suppress' certain further use of their Personal Data. When processing is restricted, the Controller can still store Users' Personal Data, but will not use it further.
- **The right to data portability.** Users have the right to obtain their Personal Data in an accessible and transferrable format so that they can re-use it for their own purposes across different service providers. This is not a general right however and there are exceptions. To learn more please get in touch (please see the Contact information section below).
- **The right to lodge a complaint.** Users have the right to lodge a complaint about the way the Controller handles or processes User's Personal Data with the relevant national Data Protection Authority.
- **The right to withdraw consent.** If Users gave consent to extensive processing by the Controller of their Personal Data (i.e. the Controller relies on consent as a legal basis for processing your information), Users have the right to withdraw that consent at any time. Users can do this by contacting the Controller (please see Contact information section below). Withdrawing consent will not however make unlawful our use of User's information while consent has been apparent.
- **The right to object to processing.** Users have the right to object to certain types of processing (for example Users may object to the publication of pictures taken at a Launchmetrics conference).
- **The right to not be subject to automated individual decision-making.** Users have the right not to be subject to a decision solely based on automated processing, including profiling. To exercise this right, please refer to the Contact information section below.

A User wishing to exercise rights regarding one or several specific processing operations, should provide a description of each relevant processing in the requests. Users' requests will be handled within a maximum of 30 (thirty) days.

### Contact information

Users wishing to exercise their rights under the applicable Data Protection Laws, or for comments, questions or concerns, or submission of a complaint regarding the collection and use of their Personal Data, may contact the following email address: [privacy@parklu.com](mailto:privacy@parklu.com).

### Changes

Where appropriate, we will notify you of any changes to this Privacy Policy.

### Entry into force

The present Privacy Policy entered into force on: October 18, 2021.

### English Version Controls

Non-English translations of this Privacy Policy are provided for convenience only. In the event of any ambiguity or conflict between translations, the English version is authoritative and controls.