

Smart Streaming Data Protection Policy

Last modified: 18 January 2024

We at Smart Streaming Limited take our responsibilities under Personal Data (Privacy) Ordinance, Cap. 486 of the Laws of Hong Kong (the "PDPO") seriously. We also recognise the importance of the Personal Data (as defined hereafter) you have entrusted to us and believe that it is our responsibility to properly manage, protect and process your Personal Data.

This Policy is designed to assist you in understanding how Smart Streaming Limited, as well as its representatives and/or agents (collectively referred to herein as "Smart Streaming", "us", "we" or "our") collects, uses, discloses, and/or processes the Personal Data you may provide in the course of the use of our website and/or application, and such functionalities, services, or features offered in connection thereof (collectively, the "Platform"), or in connection with your dealings with, though, or on the same.

As a service provider, Smart Streaming collects Personal Information as per our customer's requirements. This privacy policy does not apply to Customers or users of our customers. For information on their privacy rights and privacy practices, Customers can refer Employer's privacy policy. Customers or users of our customers can reach out to their employers regarding any queries or requests for information processing.

1. Personal Data

1.1 Personal Information Collected by Smart Streaming :

a) Smart Streaming collects the below listed Personal Information from you to provide our services or products to you:

- Company Name
- Contact Name
- Email Address
- Contact number
- Country
- Information about your use of our Platform, including cookies, domain name details, IP addresses, subscription account details and membership details

1.2 Data that Smart Streaming processes on behalf of our customers

As a service provider, Smart Streaming collects the following Personal Information on behalf of our customers through the Smart Streaming platform.

- Personal Information such as name, company, email address, contact number, and other personal information are collected as per customer's instructions.

2. Collection of Personal Data

Generally, we may collect Personal Data in the following ways,

2.1 Smart Streaming collects the Personal Data for providing our services or products to customers.

The data is collected when you,

- Register your details with our website or the website built for the project;
- Register your details with our company representatives;

- Enter into any agreement or provide other documentation or information in respect of your interactions with us;
- Submit your Personal Data to us;
- Complete our sales orders, requests or applications for our products and services (by phone, in person, mail, or electronically);
- Interact with us during promotions, competitions, contests, special events, workshops or respond to any request for additional Personal Data;
- Receive your Personal Data from business partners, public agencies, referral intermediaries, and any third parties or the relevant authorities, for example where you have been referred by business partners or where we have sought information about you in connection with your relationship with us, including for our products and services or job applications; and/or
- Submit your Personal Data to us for any other reason.

2.2 As a Service provider: Smart Streaming collects the Personal Information on behalf of our customers

The data is collected,

- When customers enter their applicants details such as name, company, email address, contact number, and other personal information for maintaining applicants records.
- When applicants update their Personal Information.

3. Purposes for Collection, Use, Disclosure and Processing of Personal Data

3.1 Subject to the provisions of any applicable law, generally, we may collect, use, and disclose your Personal Data for the following purposes depending on the nature of your interaction with us:

- to communicate with you;
- to assess, process and provide products, services and/or facilities to you, including performing obligations during or in connection with our provision of the goods and services requested by you;
- to establish your identity and background;
- to respond to your enquiries, feedback, requests or complaints and/or resolve any issues and disputes which may arise in connection with any dealings with us
- to facilitate your participation in, and our administration of, any events including workshops, promotions, contests, or campaigns;
- to share any of your Personal Data pursuant to any agreement or document which you have duly entered with us for purposes of seeking legal and/or financial advice and/or for purposes of commencing legal action;
- for detecting, conducting any form of investigation, and preventing fraudulent, prohibited, or illegal activities and analysing and managing commercial risks, including those relating to disputes, billing, fraud, offences, prosecutions etc;
- for enabling us to perform our obligations and enforce our rights under any agreements or documents that we are a party to;
- for meeting any applicable legal or regulatory requirements and making disclosure under the requirements of any applicable law, regulation, direction, court order, by-law, guideline, circular or code applicable to us;
- to enforce or defend our rights and your rights under, and to comply with, our obligations under the applicable laws, legislation, and regulations;

- for purposes required to operate, maintain, and better manage our business and your relationship with us; which we notify you of at the time of obtaining your consent;
- matching any Personal Data held which relates to you for any of the purposes listed herein;
- in connection with any claims, actions, or proceedings (including but not limited to drafting and reviewing documents, transaction documentation, obtaining legal advice, and facilitating dispute resolution), and/or protecting and enforcing our contractual and legal rights and obligations.

3.2 In addition, we may collect, use and disclose your Personal Data for the following purposes, depending on the nature of our relationship with you:

If you have an account with us:

- to process your account and to maintain your account with us;
- administering and processing your requests including creating and maintaining profiles of our users in our system database for administrative purposes;
- If you are an employee, officer or owner of a vendor, contractor or other external service provider, or prospective vendor, prospective contractor, or other prospective external service provider of Smart Streaming:
- to conduct appropriate due diligence checks;
- to create and maintain profiles of our vendors, contractors, and external service providers in our system databases;
- to process and facilitate necessary actions and processes for the purposes of the work or engagement of said vendor, contractor, and external service provider;
- to respond to emergencies.

3.3 In relation to particular products or services or in your interactions with us, we may also have specifically notified you of other purposes for which we collect, use or disclose your Personal Data. If so, we will collect, use, and disclose your Personal Data for these additional purposes as well, unless we have specifically notified you otherwise.

3.4 Smart Streaming shall undertake to protect Personal Data in its possession or under its control by making reasonable security arrangements to prevent unauthorized access, collection, use, disclosure, copying, modification, disposal, or similar risks;

3.5 Information that Smart Streaming collects on behalf of our customers.

Smart Streaming only collects information as per the customer's requirement. Our contract governs the delivery, access, and use of the Services and Application, including the processing of Personal Information and data submitted through Smart Streaming platform. The customers controls their Platform and any associated client data. If there are any questions about specific platform settings, the processing of Personal Information in the Platform, or its privacy practices, please contact the customers administrator of the platform you use.

4. Disclosure of Personal Data

4.1 Subject to the provisions of any applicable law, your Personal Data may be disclosed, for the purposes listed above (where applicable), to the following entities or parties, whether they are located overseas or operating country:

- third-party service providers, agents and other organizations we have engaged to perform any of the functions with reference to the above-mentioned purposes;

- relevant government regulators, government ministries, statutory boards, embassies, or authorities and/or law enforcement agencies, whether local or overseas, to comply with any directions, laws, rules, guidelines, regulations or schemes issued or administered by any of them; and/or
- any other party to whom you authorize us to disclose your Personal Data.

4.2 Information that Smart Streaming processes on behalf of our customers

- Smart Streaming share Customers' Personal Information only with third-party Cloud Service providers. The data Smart Streaming collect is hosted on the Alibaba Cloud in the respective country region with advanced security features.
- Smart Streaming implements, enforces, and maintains security policies to prevent the unauthorized or accidental access to or destruction, loss, modification, use or disclosure of personal data and monitor compliance with such policies on an ongoing basis.

5. Request to Withdraw Consent

5.1 You have the right, to withdraw your consent for the collection, use and/or disclosure of your Personal Data in our possession or under our control for any or all the purposes listed above by submitting your request in writing or via email to our DPO at the contact details provided below.

5.2 Upon receipt of your written request to withdraw your consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which may affect your rights and liabilities to us. Therefore, you may still receive communication during this period.

5.3 If you withdraw your consent to any or all use of your Personal Data, depending on the nature of your request, Smart Streaming may not be in a position to continue to provide its products and services to you, or administer any contractual relationship in place, which in turn may also result in the termination of any agreements with Smart Streaming, and your being in breach of your contractual obligations or undertakings. Smart Streaming's legal rights and remedies in such event are expressly reserved.

5.4 Please note that withdrawing consent does not affect our right to continue to collect, use and disclose Personal Data where such collection, use and disclose without consent is permitted or required under applicable laws.

6. Administration and Management of Personal Data

6.1 We generally rely on you to ensure that any Personal Data provided by you (or your authorized representative) is accurate and complete in all respects. In order to ensure that your Personal Data is current, complete and accurate, please promptly update us if there are changes to your Personal Data by informing our DPO in writing or via email at the contact details provided below. Until you have informed us otherwise, we will treat your Personal Data (as provided by you or our authorized representative) as accurate and complete.

6.2 We may retain your Personal Data for as long as the purpose for which that Personal Data was collected is being served by retention of the Personal Data, retention is necessary for legal or business purposes, or as required or permitted by applicable laws.

7. Data Breach Notification

In the event of a breach security leading to accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, Personal Data, we shall promptly assess the impact and once assessed that it is a notifiable data breach, we shall report this breach within 3 calendar days to the regulatory body or data protection authority. Smart Streaming will notify the customers without undue delay, within 24 hours after establishing that the data breach is likely to result in significant harm or impact to the individuals to whom the individual relates, or of a significant scale.

8. Contacting Us - Withdrawal of Consent, Access and Correction of your Personal Data

8.1 If you:

- have any questions or feedback relating to your Personal Data or about this Policy;
- would like to withdraw your consent to any use of your Personal Data as set out in this Policy; or
- would like to obtain access and make correction to your Personal Data records, please contact us as follows:

Data Protection Officer
Smart Streaming Limited
Address: C3, 21/F. TML Tower, 3 Hoi Shing Road, Tsuen Wan, N.T. Hong Kong
Contact No: +852 24970188
Email address: dpo@smart-streaming.com

9. Data Retention

9.1 Smart Streaming will retain your Personal Data as long as in necessary to fulfil the service that you have requested, comply with any laws or regulations, resolve disputes, and enforce our agreements. Data entered in Smart Streaming service is retained in accordance with any applicable agreement between Smart Streaming and its customers.

9.2 Information that Smart Streaming processes on behalf of our customers

With respect to the data which provided by the Smart Streaming customers, the Smart Streaming customers are solely responsible for defining the data retention period for their data, taking into consideration relevant laws and regulations.

The customer shall define the data retention period for their data, considering the purpose for which the data was collected and processed, the applicable legal requirements, and the customer's own data retention policies. Data entered in a Smart Streaming is retained in accordance with any applicable agreement between Smart Streaming and its customers.

We retain customers' data as long as they choose to use Smart Streaming. When a customer's account is terminated or the project was finished, the personal data will be removed from the active database after 30 days from the termination date or the project closing date.

10. Updates to this Policy

We may from time to time amend the terms of this Policy, at our absolute discretion, to ensure that this Policy is consistent with our future developments, industry trends and/or any changes in legal or regulatory requirements. Subject to your rights at law, you agree to be bound by the prevailing terms of this Policy as updated from time to time on our platform at <https://www.smart-streaming.com/data-protection-policy> . You are encouraged to visit the above website from time to time to ensure that you are well informed of our latest policies in relation to Privacy Policy.