

Privacy Policy

1. Introduction

- 1.1 This Privacy Policy sets out the policies of Personal Data processed by Doo Academy in accordance with the Personal Data (Privacy) Ordinance (Cap. 486) of Hong Kong (“**Ordinance**”).
- 1.2 We strongly advise you to carefully read this Privacy Policy before engaging with our website, services, or transactions. By accessing and utilizing Doo Academy’s services, you acknowledge and accept the terms outlined in this Privacy Policy, agreeing to our collection, processing, and use of your personal information.

2. Definitions And Interpretations

- 2.1 Throughout this Privacy Policy, unless the context otherwise requires, the following words and expressions shall bear the following meanings:
- (a) “Doo Academy” means Doo Academy HK Limited (Company Registration No. 3330153) whose registered office is located at 28/F, Tower 2, The Millennium, 98 How Ming Street, Kwun Tong, Kowloon, Hong Kong;
 - (b) “Ordinance” means the Personal Data (Privacy) Ordinance (Cap. 486) of Hong Kong and its respective published amendments;
 - (c) “Personal Data” means any data:
 - (i) relating directly or indirectly to a living individual;
 - (ii) from which it is practicable for the identity of the individual to be directly or indirectly ascertained; andin a form in which access to or processing of the data is practicable.
- 2.2 The headings to the clauses and sections in this Privacy Policy are for reference only and shall be ignored when construing the meaning of any provision of this Privacy Policy.

3. Personal Data Collected

- 3.1 Personal Data collected by Doo Academy includes but is not limited to the following:
- (a) personal identification details (e.g., name, residential address and correspondence address, email address, phone number);
 - (b) personal description (e.g., nationality, date of birth, gender, place of birth, occupation, education, income levels);
 - (c) profile data (e.g. Doo Academy platform username, photo, headline, biography, language, website link, social media profiles, or other data);
 - (d) financial identification (e.g., credit card or debit card numbers, bank account numbers and names);
 - (e) details of financial transactions (e.g., amounts paid or received, payment methods, transaction records);
 - (f) security details (e.g., password, specimen signature(s));
 - (g) device information (e.g., device type, data from computers and mobile applications, including but not limited to hardware and software specifications, device identification data, IP addresses, cookies, and device location, browser type, browsing history,

patterns or other unique information, operating system type and version, browser language);

- (h) images and voice recordings from our conversations with you;
- (i) information about your risk profile, investments, investment objectives, knowledge and experience and/or business interests and assets;
- (j) unclassified data (e.g., course questions, notes, unclassified files, reports, messages, comments, personal opinions made known to us); and
- (k) any other Personal Data permitted by or required to comply with any applicable local or foreign laws, rules, acts, regulations, subsidiary legislation notices, notifications, circulars, license conditions, directions, requests, requirements, guidelines, directives, codes, information papers, practice notes, demands, guidance and/or decisions of any national, state or local government, any agency, exchange, regulatory or self-regulatory body, law enforcement body, court, central bank or tax revenue authority or any other authority whether in Hong Kong or elsewhere, whether having the force of law or not (including any intergovernmental agreement between the governments or regulatory authorities of two or more jurisdictions or otherwise), as may be amended from time to time and our internal control and compliance policies.

3.2 The extent of information collected may vary based on your status, whether you are a visitor, regular member, or VIP member.

4. Cookies

4.1 Our website uses cookies and other data collection tools to collect your information and your visit to the Doo Academy platform or use of other websites, such as your internet protocol address, browsing history, the content of the service used, and how they navigate within the website or application.

4.2 Cookies are small bits of data stored on a web browser when you visit a website for the first time. If you visit that website again in the future, the storage of cookies on your browser enables the website to remember how you browsed through it the first time.

4.3 If you do not agree to our Cookie Policy, you can disable Cookies and still access our website normally.

5. Purpose Of Personal Data Collected

5.1 You consent and allow Doo Academy in processing the Personal Data:

- (a) to perform Doo Academy contractual obligations with you;
- (b) to verify your identity;
- (c) to comply with the laws of the Hong Kong Special Administrative Region of China;
- (d) process membership payments;
- (e) to monitor and record calls and electronic communications for processing and verification of instructions;
- (f) to monitor and record calls for business analysis, training or service improvement purposes;
- (g) in providing suitable marketing materials or information to you;

- (h) any other purposes that we notify you at the time of obtaining consent;
- (i) any other purposes incidental or relevant to the above.

6. Disclosure Of Personal Data

6.1 Doo Academy may disclose your Personal Data to third parties:

- (a) under any requests and orders from legal and regulatory authorities;
- (b) if it is necessary to perform Doo Academy's contractual obligations; or
- (c) when you have given consent.

7. Retention Period

7.1 Doo Academy shall retain your Personal Data in accordance with the Ordinance. We shall cease to retain your Personal Data as soon it is reasonable to assume that:

- (a) the purpose for which that Personal Data was collected is no longer being served by retention of the Personal Data; or
- (b) retention is no longer necessary for legal or business purposes.

8. Transfer Of Personal Data

8.1. Doo Academy will not transfer your Personal Data outside of Hong Kong unless we have reasonable grounds to believe that there is in force in that place any law which is substantially similar to, or serves the same purposes as, the Ordinance and subject to the following;

- (a) the Personal Data is used to fulfil any obligations imposed by law;
- (b) you have given consent to us in writing;
- (c) we have reasonable ground to believe that the transfer is for the avoidance or mitigation of adverse action against you, and it is not practicable to obtain your consent in writing to that transfer; and if it was practicable to obtain such consent, you would have given it;
- (d) we have taken all reasonable precautions and exercised all due diligence to ensure that the data will not, in that place, be collected, held, processed or used in any manner which, if that place were Hong Kong, would be a contravention of a requirement under the Ordinance.

9. Management Of Personal Data

9.1 Doo Academy has taken all reasonable commercial standards of technology and operational security to safeguard your Personal Data and mitigate potential risks of a security breach.

9.2 Doo Academy trains our employees and provides internal educational training to the employees handling Personal Data to respect the confidentiality of customer information and the privacy of individuals.

9.3 Doo Academy implemented procedures to safeguard Personal Data where employees are only given access to your Personal Data if it is necessary to perform Doo Academy's contractual obligation.

9.4 You acknowledge that Doo Academy cannot guarantee the absolute protection and security of the Personal Data.

9.5 You acknowledge that Doo Academy shall not be liable for any malicious and fraudulent acts committed by third parties beyond Doo Academy's control provided that Doo Academy has taken all reasonable commercial standards of care and has not been negligent in safeguarding your Personal Data.

10. Your Rights

10.1 Under the Privacy Policy, you retain the right to:

- (a) access your Personal Data;
- (b) inquire Doo Academy whether the Personal Data has been disclosed by Doo Academy within a year before the date of the request;
- (c) rectify or amend your Personal Data;
- (d) restrict the processing of Personal Data;
- (e) object against Personal Data processing for direct marketing purposes; or
- (f) demand Doo Academy to delete and erase your Personal Data.

10.2 You acknowledge that Doo Academy may need your Personal Data to fulfil its contractual obligation with you, and as such your demand for deletion of your Personal Data may result in termination of services provided by Doo Academy.

11. Third-party Links

11.1 We might include or offer third-party products or services on our platform. These third-party sites have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites.

12. Governing Law

12.1 All disputes or differences which shall at any time arise between the Parties concerning this Privacy Policy or its construction, or the effect or the rights, duties or liabilities of the Parties under it, or any other matter in any way connected with or arising out of the subject matter of this Privacy Policy shall be referred to a single arbitrator to be agreed upon by the Parties, or in default of agreement to be nominated by the Director for the time being of the Hong Kong International Arbitration Centre in accordance with the Arbitration Ordinance.

12.2 This Privacy Policy shall be governed by and construed in all respects in accordance with the laws of Hong Kong, and the parties agree to submit to the non-exclusive jurisdiction of the courts of Hong Kong.

13. Amendments

13.1 You acknowledge that Doo Academy reserves the right to modify or update this policy at any time without prior notice to you. The amendments to the Privacy Policy shall become effective immediately and shall be legally binding on you upon publishing of the Privacy Policy on Doo Academy's website. You undertake to regularly review this Privacy Policy on the Doo Academy's website.

14. Interpretation

14.1 The official language of this Privacy Policy shall be English. Doo Academy may provide this Privacy Policy in other languages for information purposes only and in the event of any inconsistency or discrepancy between the English version of this Privacy Policy and any other language version, the English version shall prevail.

15. Contact

15.1 If you have any questions and suggestions regarding the content of this policy, please feel free to contact us at support@dooacademy.com.

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