

## Privacy Policy

You can find contact information for ACG Corporation Limited at the end of this document. Please use it if you are unsure about any of the items contained herein, we will be more than happy to help resolve your query. ACG Corporation Limited is compliant under the Hong Kong SAR Personal Data (Privacy) Ordinance - Cap.486 ("PDPO").

### Information Collection and Use

#### Information Collection

ACG Corporation Limited is the sole owner of the information collected on ACG Corporation Limited . ACG Corporation Limited collects information from our users at several different points on our Web sites.

#### Registration

In order to use areas of these Web sites, a user must first complete a registration form. During registration a user is required to give contact information (such as name and email address). We use this information to create an account for the user for the service in which the user has expressed interest. To use certain services, mainly for the ones where the user is required to transfer funds to ACG CORPORATION LIMITED , registration of personal information for accounts and records purposes and for contacting you in case of a problem may be required.

#### Order/Payment

We request information from the user on our order/payment forms. A user must provide contact information (such as name, email, and home address) and financial information (such as credit card number, expiration date). This information is used for billing purposes. If we have trouble processing an order, the information is used to contact the user. You will be notified if you are agreeing to make a regular payment before you proceed with it – to terminate a regular payment or dispute a payment email or write to Payments Department, Room 3002, 30/F, Hysan Place, 500 Hennessy Road, Causeway Bay, Hong Kong. You will be billed by either ACG CORPORATION LIMITED or the appropriate third party – you will be notified of who will take the payment when it is made.

#### Information Use

Information obtained by ACG CORPORATION LIMITED is solely for accounts and records, and billing purposes, as detailed under PDPO. We reserve the right to use your information to monitor usage of products and services, and to contact you using it when we deem it necessary. Your information is kept private and secure and is not disclosed to third parties other than to perform actions on behalf of ACG CORPORATION LIMITED . None of your information will be used for any secondary purposes or for anything not directly related to the reason why you supplied it. As ACG CORPORATION LIMITED take such a high standing on the use of personal information, the user is expected to provide information which is accurate.

### Profile

ACG CORPORATION LIMITED uses cookies and some other devices during your usage of the sites. ACG CORPORATION LIMITED does not create a profile of individual users and visitors and does not target users depending on their usage of the site to protect their privacy. Third party advertisers, however, may create a profile of a user to determine what adverts are served to ACG CORPORATION LIMITED users and where.

### Cookies

A cookie is a piece of data stored on the user's computer tied to information about the user. We use session ID cookies. For the session ID cookie, once users close the browser, the cookie simply terminates. By setting a cookie on our site, users would not have to log in a password more than once, thereby saving time while on our site. Your password is not stored in a cookie; instead the cookie stores the session ID. This is for your own security and privacy, and if users reject the cookie, the user will be limited in some areas of our site.

Some of our business partners use cookies on our site (for example, advertisers). However, we have no access to or control over these cookies, once we have given permission for them to set cookies for advertising. The information stored by our advertisers is in no way linked to your personal information, which is kept completely private and secure at all times.

### Third Party Advertising

The ads appearing on this Web site are delivered to users by several globally recognized companies, our Web advertising partners. Information about a users' visit

to this site, such as number of times they have viewed an ad (but not user name, address, or other personal information), is used to serve ads to users on this site. You can email , or write to Advertising Department, Room 3002, 30/F, Hysan Place, 500 Hennessy Road, Causeway Bay, Hong Kong, for more information.

This privacy statement covers the use of cookies by ACG CORPORATION LIMITED platform only and does not cover the use of cookies by any advertisers.

#### Log Files

Like most standard Web site servers we use log files. This includes internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, platform type, date/time stamp, and number of clicks to analyze trends, administer the site, track user's movement in the aggregate, and gather broad demographic information for aggregate use. IP addresses, etc. are not linked to personally identifiable information. Log files are kept for your security, not to infringe your privacy.

#### Clear Gifs (Web Beacons/Web Bugs)

ACG CORPORATION LIMITED does not employ "Clear Gifs" to collect information about individual users. Our advertisers may do at any time, but the information will not be linked in any way to personal details stored by Commerce One Limited.

#### Communications from the Site

#### Special Offers and Updates

We may send new members welcome information (depending on the service, sometimes giving account information, general information, or payment details). Established members will occasionally receive information deemed necessary by ACG CORPORATION LIMITED for their use of the services. These messages do not infringe the users privacy and are part of the ACG CORPORATION LIMITED service. ACG CORPORATION LIMITED does not distribute any personal information to third parties.

#### Newsletter

Optional newsletter services may be provided and withdrawn by ACG CORPORATION LIMITED at any time. ACG CORPORATION LIMITED will not pass on your email address for these optional newsletters to any third parties unless specified on the individual newsletter subscription page. You can add/remove yourself from these optional newsletters at any time.

### Service Announcements

On rare occasions it is necessary to send out a strictly service related announcement. For instance, if our service is temporarily suspended for maintenance we might send users an email. These messages are not promotional and are always essential to the users' use of ACG CORPORATION LIMITED products and services. Receiving these messages is part of the ACG CORPORATION LIMITED service.

### Contact Us

We communicate with users on a regular basis to provide requested services and in regards to issues relating to their account we reply via email, mail, or phone, in accordance with the users' wishes. You may be contacted by our Contact Us staff for a period of time after your enquiry to ensure the matter was resolved, or to notify you of developments.

Our Contact Us staff do not have access to critically private information such as your password or PIN number for a specified service. At all stages of the business, user privacy is extremely important, and user information remains protected at all times.

### Sharing

### Legal Disclaimer

Though we make every effort to preserve user privacy, we may need to disclose personal information when required by law wherein we have a good-faith belief that such action is necessary to comply with a current judicial proceeding, a court order or legal process served on our Web site. We will make every effort to help the Police services with their enquiries if we believe it is in our users' interests and to protect the ACG CORPORATION LIMITED service.

### Aggregate Information (non-personally identifiable)

We do not share aggregated demographic information with our partners or advertisers unless deemed specifically necessary. Any information ACG CORPORATION LIMITED does store or share is not personally identifiable and ACG CORPORATION LIMITED believes there is no infringement of user privacy.

#### Third Party Advertisers

Advertisers may collect information while you are using ACG CORPORATION LIMITED sites about pages you have viewed, and other viewing details. This helps them provide you with different and interesting adverts on every page you see. ACG CORPORATION LIMITED does not share additional information with advertisers.

These are the instances in which we will share users' personal information:

Legal requirements and circumstances

When permission/authorization has been obtained from a user

#### Third Party Intermediaries

We use a credit card processing company to bill users for goods and services. We may also need to use other companies to deal with your requests or provide certain services. Other companies on our behalf will provide some services. These companies do not retain share, store or use personally identifiable information for any secondary purposes.

#### Service Providers

Third parties, who are providing a product or service on our behalf to the user, are not allowed to use personally identifiable information except for the purpose of providing these services. Secondary usage is strictly forbidden.

#### Choice/Opt-out

Any newsletters you subscribe to from ACG CORPORATION LIMITED can be opted for or removed from at any time, and will not automatically subscribe you to other newsletters or mailing lists, or third parties. Other services that ask for your email address on ACG CORPORATION LIMITED will do so purely for accounts and records, and to contact you personally when necessary. This is part of the ACG CORPORATION

LIMITED service. In many cases we will not be able to provide you with a product or service without taking contact details for you.

#### Links

This Web site contains links to other sites. Please be aware that we, ACG CORPORATION LIMITED , are not responsible for the privacy practices of such other sites. We encourage our users to be aware when they leave our site and to read the privacy statements of each and every Web site that collects personally identifiable information. This privacy statement applies solely to information collected by these web sites (ACG CORPORATION LIMITED ).

#### Surveys & Competitions

From time-to-time our site requests information from users via surveys or competitions. Participation in these surveys or contests is completely voluntary and the user therefore has a choice of whether or not to disclose this information. The requested information typically includes contact information (such as name and shipping address), and demographic information. Contact information will be used/shared with the competition/survey to notify the winners, and award prizes, or analyse data. Survey information will be used for purposes of monitoring or improving the use and satisfaction of this site, as well as by our advertisers. Users' personally identifiable information is not shared with third parties unless we give prior notice and choice, or the survey or competition is entered through an advert provided by a third party advertising company. Though we may use an intermediary to conduct these surveys or contests, they may not use users' personally identifiable information for any secondary purposes.

#### Security

ACG CORPORATION LIMITED takes every precaution to protect our users' information. When users submit sensitive information via the Web site, their information is protected both online and off-line.

#### Credit Check

ACG CORPORATION LIMITED reserves the right to perform credit referencing and other checks before offering credit facilities to customers where available. Checks will be made by our authorised third party to authorise transactions on major credit and debit cards if you are making purchases through ACG CORPORATION LIMITED .

They will obtain "available credit" information from your card issuer and may validate other details for security reasons.

#### Purchasing History

ACG CORPORATION LIMITED reserves the right to keep details of other transactions, or services you have used, when dealing with us. They will not be disclosed to third parties, and used only for accounts and records purposes.

#### Enhancement of Marketing Profile

All our advertising is handled by the named advertising companies, other advertising companies, or companies acting on their behalf. ACG CORPORATION LIMITED does not purchase third party information to assist advertising.

#### Correcting/Updating/Deleting/Deactivating Personal Information

ACG CORPORATION LIMITED requires you to keep your information accurate and correct. If at any time you wish to see the information held about you by ACG CORPORATION LIMITED , you need to contact us and request your account details. A charge deemed by ACG CORPORATION LIMITED as "reasonable" will need to be paid before we release the information to cover our administration costs. If any information held about you by ACG CORPORATION LIMITED is inaccurate then you are responsible for ensuring it is corrected. You must also ensure the information given to us is accurate and correct at all times. We will amend any information found to be incorrect but any information provided directly by you (i.e. name and address) is your responsibility to maintain. ACG CORPORATION LIMITED reserves the right to retain your personal information for as long as is necessary after you request your account closed. However, you will no longer be bound by the terms and conditions of a service once a ACG CORPORATION LIMITED representative has confirmed the account closed. You must no longer use this account.

#### Notification of Changes

If we decide to change our privacy policy, we will post those changes to this privacy statement, the homepage, and other places we deem appropriate so our users are always aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. We will use information in accordance with the privacy policy under which the information was collected.

If, however, we are going to use users' personally identifiable information in a manner different from that stated at the time of collection we will notify users via email. Users will have a choice as to whether or not we use their information in this different manner. However, if users have opted out of all communication with the site, or deleted/deactivated their account, then they will not be contacted, nor will their personal information be used in this new manner. In addition, if we make any material changes in our privacy practices that do not affect user information already stored in our database, we will post a prominent notice on our Web site notifying users of the change. In some cases where we post a notice we will also email users, who have opted to receive communications from us, notifying them of the changes in our privacy practices.

#### Contact Information

If users have any questions or suggestions regarding our privacy policy, please contact us at:

Room 3002, 30/F, Hysan Place, 500 Hennessy Road, Causeway Bay, Hong Kong

<http://www.acg-corp.com>

Your query will be dealt with quickly. If sending a letter please include a return address, contact telephone number, and username/ email address.

Thank you.