

## Privacy Policy

Your privacy is of ultimate importance to Resbo. Our Privacy Policy not only fully complies with, but also exceeds the Personal Data (Privacy) Ordinance of the Hong Kong SAR.

Personal data refers to data that can be used to uniquely ascertain the identity of an individual either directly or indirectly. We collect no more than the minimal amount of your personal data required to provide and/or enhance our services. This Privacy Policy explains how we collect, use and disclose your information including your personal data and beyond so that you can comfortably enjoy our services without the fear of your privacy being compromised. To facilitate the provision of services, Resbo may share the personal information (including mobile telephone numbers) of clients/agents with their counterpart agents/clients. Resbo, its related companies and business partners may share your information for providing you services, advantages, awards, new services, promotional services and marketing services but will never share your personal data with any other unrelated parties.

### Collection of Information

Resbo and related companies will ask you for the minimal amount of information, including personal data, when needed. You may elect not to provide but in most cases that will render us unable to provide you with our best services; award you with the gifts and rewards; offer new and promotional services; and/or respond to your requests for services.

The following are some examples of the types of information that we may collect. Rest assured that we will only use the information in accordance with this Privacy Policy.

1. When you create a Resbo account, we may collect a variety of personal data, including your surname, preferred honorific and phone number. You are not required to provide your full legal name unless it is needed for us to comply with regulatory requirements, or to verify your identity against any government agencies or regulatory bodies.
2. Your surname, preferred honorific and membership class (if applicable) may be shown to your counterpart for communication purpose.
3. When you list a property for sale, you may elect to provide certain information related to your property, including but not limited to its partial address and the asking price. You are not required to provide the full address of your property (unless you prefer) because that may be used to associate with your personal data.
4. When you (being the referrer) invite others and/or being invited by a referrer (a registered user other than yourself) to register with or participate in Resbo activities/services, we will collect minimal personal data about you and/or your referrer. To better protect the privacy of both you and your referrer, you are not required to provide yours as well your referrer's full name that may be used to associate with yours as well as his/her personal data. Please remember that you must have acquired the consent of your referrer before filling in his/her information.
5. When you collect awards, rewards and/or advantages, you may be required to produce your identity document such as your HKID card or passport for our internal audit purpose.

### How Your Information Is Used

1. Public Information (公開資料) includes the surnames and honorifics (and/or other names if so elected) of registered users and any other information provided to Resbo, with the exception of

your mobile phone number. The Public Information will be accessible by other users, the general public, Resbo's related companies and Resbo's business partners and therefore falls outside the scope of this Privacy Policy.

2. Restricted Information (保密資料) includes the users' and their referrers' phone numbers and any personal information other than the Public Information. The Restricted Information will be well protected and only be used by Resbo and related companies including Resbo's business partners and Resbo's service providers for the communication, delivery of products/services, promotion of products/services and marketing purposes. It may also be used for the testing, developments and enhancements of our services.
3. Additional personal information including proofs of identity, ownerships of properties, ownership of phone numbers, ownership of businesses, agency licenses etc. may have to be collected under certain circumstances, for example, for collection of awards and rewards, confirmations of accounts, verifications of ownerships of businesses and verifications of ownerships of properties etc. The additional personal information will be well protected as Restricted Information.

#### Disclose to Other Parties

1. Resbo may be required by law, legal process and governmental authorities in Hong Kong to disclose your personal data. We may also disclose information about you if we determine that disclosure is necessary for law enforcement.
2. We may also disclose your information if that is deemed necessary to enforce our terms and conditions, or to protect our operations and the other users.
3. In the event of a reorganization, merger, or sale we may transfer all and any of your personal data, your Public Information and Restricted Information to the relevant third party.

#### Collection and Use of Non-Personal Data

1. We may collect various types of non-personal data such as country codes, area codes, locations, time zones, languages, activities, searches, hits, frequencies of usages, activities, response time, browsers, internet service providers, IP addresses...etc.
2. Resbo may use and/or transfer to third parties the non-personal data for any purposes including taking statistics and constructing databases, with or without you being signed into the services or not. The statistics and databases are essential for us to better understand your needs and requirements and further enhance our services through marketing and advertising services.

#### Cookies and Other Technologies

Resbo's services, Apps, Website, Messages, and advertisements may use "cookies" and other technologies such as pixel tags and web beacons. These technologies help us better understand user behavior, tell us which parts of our services people have visited, and facilitate and measure the effectiveness of advertisements and web searches. We treat information collected by cookies and other technologies as non-personal data. However, if Internet Protocol (IP) addresses or similar identifiers are considered personal data by local law, we will also treat these identifiers as personal information.

Resbo may use cookies and other technologies to remember personal data when you use our services. Our goal in these cases is to make your experience with Resbo more convenient and personal. For example, knowing your region and language helps us provide a customized experience.

If you want to disable cookies, check with your browser provider to find out how to disable cookies. Please note that certain features of the Resbo Website may not be available once cookies are disabled.

Similar to many other platforms, we gather some information automatically and store it in log files. This information includes Internet Protocol (IP) addresses, browser type and language, Internet service provider (ISP), referring and exit Websites and applications, operating system, date/time stamp, and clickstream data.

We use this information to analyze usage behaviour, administer the site, improve our services, and understand more about our users. Resbo may use this information in our marketing and advertising services.

#### Protection of Personal data

It is Resbo's mission to protect your privacy. We do so by minimizing the personal data that we collect from you, especially those that can be used to personally identify you. When we collect potentially sensitive information, such as the address of your property, we believe you, the user of Resbo services, shall decide the extent of details to be disclosed as Public Information, and such decision will not affect the quality of services you receive from Resbo.

Resbo services may let you send Messages or post on a forum, chat room, or social networking service. You shall be aware that all the contents or information shared by you is visible to other users, and can be read, collected, or otherwise used by them. You are responsible for the personal data you choose to share or submit in these instances. For example, if you provide your name or phone number in a message to another user, that information will be visible to that particular user. Resbo is not responsible for how that information may be used by that particular user. Please be mindful when you disclose any personal data.

#### Integrity and Retention of Personal data

Resbo will retain your personal data for the period necessary to fulfill the purposes as explained in this Privacy Policy. If you have any concerns for your personal data kept by Resbo, please contact us. Upon your request with legitimate reasons, Resbo will act in accordance with the local law, and on a best effort basis, remove the personal data from Resbo's active database if Resbo is not required to retain it by law or for any legitimate business purposes. We may decline to process requests that are unreasonable, frivolous, vexatious, impractical, or jeopardize the use of Resbo services by others.

#### Minors

In order to protect the privacy of minors, persons under the age of full legal responsibilities, age 18 in the jurisdiction of Hong Kong, are not permitted to create their own Resbo Accounts. If we learn that we have collected the personal data of a minor, we will take extra steps to delete the information as soon as possible. Please contact us if you think such information has been collected by Resbo services.

#### Location-Based Data

Certain functionalities of Resbo services may improve your user experience by utilizing location-based technologies. For example, when you choose to enter the address of your property with your geolocation, Resbo may collect and use precise location data, including the real-time geographic

location of your device, which may be determined by the use of GPS, Bluetooth, your IP Address, Wi-Fi hotspot, cell tower locations, and other technologies.

#### Third-Party Sites and services

Resbo services, including but not limited to our websites and applications, may contain links to third-party websites, applications, services and/or products. When you use third-party websites, applications, services or products, your information may be collected by the third parties as governed by their own privacy policies, including but not limited to your personal data or location data. Resbo cannot control, and is thus not responsible, for the use of your information by the third parties. You should learn about the privacy policy of the third-parties before using their websites, applications, services or products.

#### Privacy Policy Updates

Resbo may update its Privacy Policy from time to time. You shall check the Privacy Policy before using the Resbo services. Using and continue using the Resbo services after any Privacy Policy update implies that you agree with the updated Privacy Policy.

#### Enquiries

If you have any questions or concerns about this Privacy Policy and/or our services, please feel free to contact us. Rest assured that we are always at your service.

Resbo Technology Limited

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