



## PRIVACY POLICY

### Our Commitment

Tradelinek Electronic Commerce Limited (hereinafter referred to as "Tradelinek", "the Company", "We", "our" or "us") respect the privacy rights of our customers and their authorised signatories (for body corporates) (hereinafter referred to as "you" or "your") and we are committed to safeguarding your privacy and ensuring that your personal data is protected. This Privacy Policy explains, among other things, the types of personal data we collect and how we process and protect that data.

We shall keep your personal data confidential and shall ensure that our policies and practices with respect to the collection, use, retention, disclosure, transfer, security and access of your personal data comply with the Personal Data (Privacy) Ordinance (Cap.486, the Laws of the Hong Kong Special Administrative Region) ("PDPO"), as amended from time to time.

The term "personal data" shall have the meaning as ascribed to it under the PDPO.

### Personal Information Collection Statement ("PICS")

This PICS is issued pursuant to the PDPO in relation to the operation of our business.

- Definitions  
Under this PICS, unless the context otherwise requires, the following words and expressions shall have the following meanings:
  - "Customers" means our customers.
  - "EDI Messages" means data structured in accordance with an internationally agreed standard and any other standard as Tradelinek considers appropriate and transmitted by electronic means through Tradelinek Services.
  - "Government" means the Government of Hong Kong.
  - "Hong Kong" means the Hong Kong Special Administrative Region of the People's Republic of China.
  - "Intended Recipient" means any person or party to whom any Messages are intended by the sender to be sent through or incidental to any of the Tradelinek Services.
  - "Messages" means both "EDI Messages" or "Other Messages".
  - "Other Messages" means unstructured data electronically transmitted through Tradelinek Services, including data received or transmitted through e-mail, flat file transfer and image file transfer.
  - "Trader Data" means all data, documents, records, text, drawings, diagrams, sound, images, and information of whatever nature (in machine readable or any other form) disclosed, divulged, submitted, supplied or made available to Tradelinek (whether electronically or otherwise) by or on behalf of the Trading Community or collected by Tradelinek from the Trading Community (whether electronically or otherwise) under or in connection with any contract or agreement signed between Tradelinek and Government for Tradelinek Government Services.
  - "Trading Community" means persons who apply for, or deal with, or are otherwise involved in the trade-related documents as specified in any contract or agreement signed between Tradelinek and Government for Tradelinek Government Services, and any other trade-related documents subsequently agreed between Tradelinek and Government.
  - "Tradelinek Government Services" means those Government services provided by Tradelinek in accordance with agreements between Government and Tradelinek.
  - "Tradelinek Registration Forms" means any of the paper or electronic forms or documents used by the Customers to register with Tradelinek to use one or more of the Tradelinek Services, to give any instructions to Tradelinek, to add or unsubscribe any Tradelinek Services, to make any specific authorisations, to amend any records, and/or for any other purposes of and incidental to any Tradelinek Services.
  - "Tradelinek Services" means all or any of the electronic services from time to time provided by Tradelinek.

### Purpose of Collection and Use of Personal Data

- In order for you to use Tradelinek Services, it is necessary for you to provide us with certain essential personal data as required in the Tradelinek Registration Forms and other documents in relation to Tradelinek Services, including without limitation, all forms for using Tradelinek Government Services. We may also ask you for other information which helps us to offer you tailored products and services that we think may be of interest to you. The types of personal data we may collect include your name, address, email, telephone number, Hong Kong identity card number, your business information such as company name and business title.
- We shall have the right to collect, hold, process and/or use, your personal data in accordance with this PICS. If you are unable or unwilling to provide us with complete and correct personal data, we may not be able to provide or continue to provide Tradelinek Services to you.
- Tradelinek shall observe the PDPO and procure all staff of Tradelinek to comply with the reasonable standards of confidentiality. Your personal data (e.g. telephone number, business and email addresses) will be used for the purposes of:
  - providing Tradelinek Services to you;
  - providing you with regular communications from us with details of our business and our products and services;
  - handling of your complaints and inquiries;
  - research and analysis of the data in the aggregate;
  - marketing, making suggestions or recommendations of goods or services provided by Tradelinek or Tradelinek's subsidiaries, associated companies or business partners which are relevant or helpful to your business and which you may be interested in;
  - detection or prevention of crime;
  - auditing purposes;
  - transferring the same, in machine readable form or in any other form, to Government or a third party appointed by Government to be used for or in relation to the delivery, implementation, provision and/or operation of the Tradelinek Government Services or for other trade control or trade facilitation purposes as specified by Government;
  - using the same for any matching procedure to be carried out by Government or its appointed third party, or such other uses of the same as referred to or contemplated under any contract or agreement that has been signed or may be signed between Tradelinek and Government in relation to Tradelinek Government Services;
  - other purposes otherwise expressly agreed between Tradelinek and the Customers; and
  - (xi) making disclosures as required by applicable laws.

I object to the use of my personal data for direct marketing of goods and/or services as mentioned in Clause 4(v) above.

For the purpose of this Clause 4 (v) above, Tradelinek may not use your personal data unless with your written consent. At any time you object to the use of your personal data for direct marketing of goods and/or services as mentioned in Clause 4(v) above, you can opt out by sending us an opt-out request to the person and address as specified in Clause 10 below. Upon receipt of your request, we shall cease to use your personal data as soon as possible for direct marketing purpose without charge to you.

### Possible Transferees

- You agree that Tradelinek may disclose and transfer your Trader Data or personal data (e.g. telephone number and business and email address) to the following parties within the same jurisdiction or from one jurisdiction to another in compliance with the requirements of the PDPO:
  - any agent, contractor or third party service provider who provides administrative, telecommunications, computer, payment or securities clearing or other services to Tradelinek in connection with any Tradelinek Services;
  - the Government agency, authority, a third party appointed by Government;
  - any person where such disclosure is required by law;
  - any person owing a duty of confidentiality to Tradelinek, including any subsidiaries or associated companies which have undertaken to keep such information confidential and our agents, professional advisors and consultants;
  - credit reference agencies and, in the event of default, debt collection agencies; or
  - any actual or proposed assignee of Tradelinek or transferee of Tradelinek's rights or obligations.
- Save and except for the above purposes and subject to clause (5) above, Tradelinek shall not disclose the personal data to any third party (other than the Intended Recipient) without the consent of the Customers.
- Tradelinek shall restrict access to personal data to officers, employees, consultants and agents of Tradelinek who have a need to know or use the data and who have been trained to handle such data and observe confidentiality properly.

### Browsing information collected from you (Cookies)

- During your visit to our websites ([www.tradelink.com.hk](http://www.tradelink.com.hk) and [www.tradelink-ebiz.com](http://www.tradelink-ebiz.com)), we may use "Cookies" or other technical means to collect the identification and contact details of you as a visitor, information on your preferences in relation to the subject matter of the websites. We use such information for the purposes of compilation of aggregate statistics on site usage and marketing of our services provided or recommended by us or our marketing partners.
- You may refuse to accept Cookies (by modifying the relevant Internet options or browsing preferences of your computer system), but to do so you may not be able to utilize or activate all of the functions and services of our websites.

### Your rights in relation to your Personal Data

- The Customers shall have the right to request for access and correction of personal data held by Tradelinek. Request for access and correction or any inquiries in relation to the our Privacy Policy should be in writing and addressed to Privacy Compliance Officer, 11/F & 12/F, Tower B, Regent Centre, 63 Wo Yi Hop Road, Kwai Chung, Hong Kong, Tradelinek may charge a reasonable amount of fee for handling such request for access or correction.

### Protecting your Personal Data

- We maintain appropriate technical and organizational measures to protect your personal data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to your personal data.
- Our websites may contain hyperlinks to other websites provided by third parties. We do not control these third party websites or any of the content contained on those websites. Once you have left our websites, we cannot be responsible for the protection and privacy of any information which you provide. You should exercise caution and look at the privacy statement for the website(s) you visit.

### Retention of your Personal Data

- Unless there is a mandatory legal, regulatory or contractual requirement for us to keep your personal data for a specified period, we shall only retain your personal data for as long as is necessary to fulfil the purpose for which the same was originally collected.

### Miscellaneous

- If there is any inconsistency or conflict between the English and Chinese versions of this Privacy Policy, the English version shall prevail.
- We may change this Privacy Policy from time to time by posting an updated version on the our websites ([www.tradelink.com.hk](http://www.tradelink.com.hk) and [www.tradelink-ebiz.com](http://www.tradelink-ebiz.com)).
- This Privacy Policy shall be governed by, and construed in accordance with, the laws of the Hong Kong.

Last updated on : 9 October 2020

## 私隱政策

### 我們的承諾

貿易通電子貿易有限公司(下稱「貿易通」、「本公司」、「我們」或「我們的」)尊重客戶及其授權簽署人(法團適用)(下稱「你」或「你的」)的私隱權,且我們承諾保護你的私隱及確保你的個人資料受到保護。本私隱政策說明我們所收集的個人資料種類,我們如何處理與保護該等資料以及其他相關內容。

我們須為你的個人資料保密,並確保我們有關收集、使用、保留、披露、轉移、保護及存取你個人資料的政策及守則遵循經不時修訂的《個人資料(私隱)條例》(香港法例第486章)。

「個人資料」一詞具有《個人資料(私隱)條例》所賦予的涵義。

### 個人資料收集聲明(「本個人資料收集聲明」)

本個人資料收集聲明乃根據《個人資料(私隱)條例》就本公司業務運作的相關事宜而發出。

- 定義  
除非定義另有所指,以下用詞及表述在本個人資料收集聲明具有以下涵義:
  - 「客戶」指本公司客戶。
  - 「EDI訊息」指按照國際公認的標準及貿易通認為適當的任何其他標準建立的,並以電子方式透過貿易通服務傳送的該等數據。
  - 「政府」指香港政府。
  - 「香港」指中華人民共和國香港特別行政區。
  - 「預期接收者」指發送方擬透過任何貿易通服務或附帶於任何貿易通服務向其發送任何訊息的人士或一方。
  - 「訊息」指「EDI訊息」及「其他訊息」。
  - 「其他訊息」指透過貿易通服務以電子形式傳送的非結構化數據,包括透過電郵、平面文件傳輸和圖像文件傳輸而接收或發送的数据。
  - 「貿易商數據」指貿易社區或其代表(無論是透過電子或其他形式)向貿易通披露、披露、提交、給予或提供的或由貿易通根據貿易通與政府就貿易通政府服務簽訂任何合同或協議向貿易社區(無論是透過電子或其他形式)收取的任何性質的數據,文件、記錄、文字、圖表、圖表、聲音、圖畫及資料(機器可讀形式或任何其他形式)。
  - 「貿易社區」指負責申請、處理或以其他方式牽涉於下述兩者的人士:(i)貿易通與政府就貿易通政府服務簽訂的任何合同或協議中所指明的貿易通相關文件,以及(ii)貿易通與政府隨後同意訂立的任何其他貿易通相關文件。
  - 「貿易通政府服務」指貿易通根據政府與貿易通之間的協議所提供的政府服務。
  - 「貿易通登記表格」指客戶為以下目的使用的任何紙張或電子表格或文件:向貿易通登記使用一項或多項貿易通服務;向貿易通發出任何指示;增加或取消任何貿易通服務使用登記;作出任何具體授權;修改任何記錄及/或任何與貿易通服務有關之任何其他目的。
  - 「貿易通服務」指由貿易通不時提供的所有或任何電子服務。

### 收集及使用個人資料的目的

- 要使用貿易通服務,你需要向我們提供貿易通登記表格和其他貿易通服務相關文件所要求的某些必要個人資料,包括但不限於因為使用貿易通政府服務而需填寫的所有表格。我們亦可能要求你提供個人資料,以協助我們為你提供我們為你而設且我們認為你可能會感興趣的產品及服務。我們可能收集的個人資料種類包括你的姓名、地址、電子郵件、電話號碼、香港身份證號碼,以及你的業務資料,例如公司名稱和職銜。
- 我們有權根據本個人資料收集聲明收集、持有、處理及/或使用你的個人資料,如你不能或不願意提供全面及準確的個人資料,我們或無法向你提供或繼續提供貿易通服務。
- 貿易通須遵守《個人資料(私隱)條例》及促使所有貿易通員工遵循合理的保密標準。你的個人資料(例如:電話號碼、業務及電郵地址)將用於下列用途:
  - 向你提供貿易通服務;
  - 向你提供來自我們的定期通訊,詳列我們的業務、產品與服務詳情;
  - 處理你的投訴及查詢;
  - 研究及分析整體數據;
  - 向你推銷、建議或推薦對你業務相關或有助於你或可能感興趣的由貿易通或其附屬公司、聯營公司或業務合作夥伴提供的商品或服務;
  - 偵測及防止罪行;
  - 審核用途;
  - 將之轉移(機器可讀形式或任何其他形式)至政府或政府指定的第三方,以用於履行、執行、提供及/或經營貿易通服務或用於政府所指定的其他貿易管制或貿易促進的目的;
  - 將之用於由政府或其指定的第三方進行的任何配對程序,或貿易通與政府就貿易通政府服務而簽訂的或可能簽訂的任何合同或協議中所提及或協議之其他用途;
  - 貿易通與客戶另有明確協議的其他用途;及
  - 根據適用法律要求進行披露。

我反對我的個人資料用於上述第4(v)款所述的商品及/或服務直銷用途。

就上述第4(v)條之用途,除非得到你的書面同意,否則本公司不得使你的個人資料。你可隨時反對將你的個人資料用於上述第4(v)條中提及的商品及/或服務直銷用途,你可向我們上述第10條所指定的人士及地址發出停止接收直銷訊息的要求,表達你不想再接收這些直銷訊息。收到你的要求後,我們將盡快停止使用你的個人資料作直銷用途(不會就此另行收費)。

### 可能的承辦者

- 你同意貿易通可能會在遵照《個人資料(私隱)條例》的規定下,向位於同一司法管轄區或其他司法管轄區內的任何下述各方披露及轉移你的貿易商數據或個人資料(例如:電話號碼、業務及電郵地址):
  - 就任何貿易通服務,向貿易通提供行政、電訊、電腦、付款或證券結算或其他服務的任何代理人、承包商或第三方服務供應商;
  - 政府機關、當局、由政府委任的第三方;
  - 法例規定須向其披露有關資料的任何人士;
  - 對貿易通負有保密責任的任何人士,包括已承諾為該資料保密的任何附屬公司或聯營公司,以及我們的代理人、專業諮詢人及顧問;
  - 信貸資料服務機構及收債公司(如欠繳款項);或
  - 貿易通的任何實際或建議承辦人或貿易通的權利或義務的受讓人。
- 除為了上述目的及根據上述第(5)條外,貿易通不得在未經客戶同意的情况下向任何第三方(預期接收者除外)披露個人資料。
- 貿易通須限制個人資料只能被以下人士查閱:需要知道或使用此等資料、曾受訓練處理此等資料並會受遵守保密義務的貿易通的高級人員、僱員、顧問及代理人。

### 向你收集的瀏覽資訊(Cookies)

- 當你瀏覽我們的網站([www.tradelink.com.hk](http://www.tradelink.com.hk)及[www.tradelink-ebiz.com](http://www.tradelink-ebiz.com))時,我們可能會使用「Cookies」或其他技術來收集你作為訪客的個人識別及聯絡資料,以及與網站主題相關的你的喜好資料。我們會將該等資料用於編製網站使用情況的綜合統計數字,以及推廣由我們或我們的營銷合作夥伴所提供或推薦的本公司服務。
- 你可以透過更改你電腦系統上的相關互聯網選項或瀏覽設定拒絕接受 Cookies,但這樣做可能會令你無法使用或啟動我們網站的所有功能和服務。

### 你就個人資料享有的權利

- 客戶有權要求查閱及更正由貿易通持有的個人資料。客戶須以書面形式致函私隱合規主任(地址:香港葵涌和宜合道63號禮品中心B座11及12樓),提出查閱及更正個人資料的有關要求,又或就本公司的私隱政策作出查詢;貿易通可為處理以上查閱及更正要求收取合理金額的費用。

### 保護你的個人資料

- 我們將持續採取適當的技術及組織措施,以防止你的個人資料被意外或非法定竊取、遺失、更改、未經授權披露或存取。
- 我們的網站可能包含由第三方提供的其他網站的超連結。這些第三方網站或網站上的任何內容不受我們管理。一旦你離開我們的網站,我們即不會就你提供的任何資料的保護和私隱負責。瀏覽其他網站時應小心理慎,並應細閱這些網站的私隱聲明。

### 保存你的個人資料

- 除非我們必須根據法律、監管或合約的要求在指定時間內保存你的個人資料,我們僅會為收集該等資料的原有目的在實際所需時間內保存你的個人資料。

### 其他條款

- 如本私隱政策之中英文版本有任何歧義,概以英文版本為準。
- 我們或會不時更改本私隱政策,並透過本公司網站([www.tradelink.com.hk](http://www.tradelink.com.hk)及[www.tradelink-ebiz.com](http://www.tradelink-ebiz.com))發佈最新版本。
- 本私隱政策受香港法律管轄並按其解釋。

最後更新日期:二零二零年十月九日