

PRIVACY POLICY

This Privacy Policy is to inform you that Asia Win Inc Limited and its associated companies have or will collect, record, hold, store, use, disclose and/or process (collectively “**Process**” or “**Processing**”) your Personal Data (as defined below) in a manner consistent with its philosophy of respect for individuals, sound business practices and in accordance with the applicable laws of Hong Kong.

Asia Win Inc Limited is a Corporate Authorised Representative (AFS Representative Number 001304618) of Quad Code AU Ltd (AFSL 327075). GUGU and Asia Win Inc Limited are all referred to as “GUGU”, “we”, “us” or “our” in this document. When we refer to the Service, we also mean any portion, aspect or feature of our services or the Service. The words “you”, “your” and “yours” refer to you as the user of the Service.

By interacting with Asia Win Inc Limited, and its associated companies (including its related corporations and business units) (collectively, the “**Companies**”), as well as the Companies’ respective representatives and/or agents (collectively referred to herein as “**us**”, “**we**”, “GUGU” or “**our**”), submitting information to us, using any of the websites and mobile application or social media sites of the Companies (collectively, “**Sites**”), subscribing or registering for any event or account (“**Account**”) with us (“**subscribers**”), providing us with your personal data or signing up for any products and services offered by us (“**Products**” and “**Services**”), you agree and consent to our Processing of your Personal Data and the terms of our Privacy Policy.

For the avoidance of doubt, your consents given under this Privacy Policy supplement (but do not supersede or replace) any other consents that you may have previously provided or will provide to us, and are additional to any rights which we may have at law to collect, use or disclose your Personal Data.

If you have any questions relating to our Privacy Policy or your Personal Data, please contact us via support@gugu.fund

We may update this Privacy Policy from time to time through our Website in accordance with future developments and/or changes in legal or regulatory requirements. By continuing to interact with us, you consent to be bound by the prevailing terms of our Privacy Policy as updated from time to time, subject to applicable laws.

1. Collection of Personal Data

1.1. **“Personal Data”** refers to any data, whether true or not, about an individual who can be identified from that data and other information to which we have or are likely to have access, including data in our records as may be updated from time to time which may include, but is not limited to:

- (a) contact details: home address, correspondence address, billing address, home phone number and mobile number, e-mail address, work address, work number;
- (b) compensation/payment details: bank account details, credit card details, banking information;
- (c) verification details: information pertaining to the verification of identity
- (d) optional details: includes, but is not limited to age, gender, salary range and employment details, education and profession, hobbies and leisure activities, other related products and services subscribed to, and family and household demographics;
- (e) data relating to online session: browser type and version, operating system, domain name;
- (f) photographs and/ or video recordings of attendees attending the seminars or events with us;
- (g) account ID with third party brokerage platform;
- (h) information about your investments; and
- (i) any such information as we deem necessary or appropriate from time to time in connection with your commercial relationship with us.

1.2. **Scope:** When you interact with us, either online or offline, such as by registering for an Account with us, registering with us generally, enquiring into or purchasing our Products or Services, we may collect a variety of Personal Data from you, including your name, mailing address, phone number, email address, contact preferences and credit card information. When you attend a seminar or event with us, photographs or videos may also be taken, and depending on the location of such seminar or event, closed circuit television cameras may also be in use for security and surveillance purposes. Other additional sources of Personal Data that may fall within this policy include:

- (a) information provided or submitted by you through among others, the use of our Sites, and attending our seminars ;
- (b) information gathered through promotional activities;
- (b) information gathered through promotional activities;
- (c) cookies that your web browser store on your computer when you visit a website;
- (d) as applicable, publicly available or publicly accessible information; and
- (e) such other written or verbal communications or documents delivered to us prior to and during the course of our contractual or pre-contractual dealings with you.

1.3. In certain situations, you may be providing us with Personal Data relating to other individuals, e.g. your employees, spouse, children, etc., such as when you register for a seminar on their behalf. Where you provide us with any Personal Data relating to a third party, you warrant and represent to us that you have obtained the consent of that third party to provide us with that party's Personal Data in accordance with our Privacy Policy.

1.4. You should ensure that all Personal Data submitted to us is complete, accurate, true and correct to the best of your knowledge. If you are a person under the age of 18, please ensure that your Personal Data is submitted by a person who is lawfully able to do so on your behalf.

1.5. In relation to particular Products and 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. Should you consent, we will collect, use and disclose your Personal Data for these additional purposes as well.

2. Purpose and Use of Personal Data

2.1. We may use your Personal Data to communicate with you such as by sending you messages, notices or information relating to your Account with us, any payment you have made for our Products and Services, any confirmation of or changes to details of our seminars or events that you have signed up for, any changes to our Privacy Policy, or other matters directly related to the purposes for which you have provided us your Personal Data.

2.2. We may also use your personal data to keep you posted on our latest announcements, promotions, seminar updates and upcoming events by emails, telecommunications means (telephone calls, SMS messages or social chat applications) or internet social media. If you do not wish to receive such information, you can unsubscribe from our mailing list, change your preferences in your Account with us, or inform us in writing or via email. We will put this into effect within 10 business days.

2.3. Where photographs or videos of our seminar or events are taken, these may be used for updates on our Sites, (including on our Facebook page) or sent to persons who have subscribed or registered for any event or Account with us.

2.4. We will collect, use and store Personal Data fairly and lawfully and in accordance with this Privacy Policy. We will only collect Personal Data for legitimate and reasonable purposes, and use Personal Data for the purposes for which it was collected- which include but is not limited to Personal Data collected:

(a) for you to enter into the necessary agreement and/or contract to purchase products

- and/or services from us,
- (b) user or customer relationship management procedures;
 - (c) processing of orders and payment clearing;
 - (d) those purposes specifically provided for in any particular service or product offered by us;
 - (e) credit assessments and other background checks of customers as we may determine to be necessary or appropriate;
 - (f) customising advertising and content so as to streamline the online experience of customers and to provide personalised marketing and promotional information;
 - (g) customer care and/or defect rectification works;
 - (h) in order to respond to the inquiries of customers;
 - (i) membership registration and offering benefits and privileges;
 - (j) conducting marketing, promotional and client profiling activities in connection with our Services and related Products for us, our vendors and business partners and other selected companies;
 - (k) use for internal purposes such as auditing, data analysis, and research to improve any Companies' Products, Services and customers' communications;
 - (l) prevention or detection of crime, for the purposes of investigations, apprehension or prosecution of offenders, or assessment or collection of any tax or duty or other similar impositions; and
 - (m) meeting any legal or regulatory requirements relating to our provision of services and products and to make disclosure under any statutory legislations, court order, by-laws and relevant regulations applicable to us.
 - (n) providing the Products and/or Services to you;
 - (o) enforcing any of the terms of any agreement we have with you or for any other purposes as permitted or required by any applicable law; and
 - (p) any purposes which are reasonably related to the above matters.

3. Disclosure of Personal Data

We generally do not disclose or share your Personal Data with any third parties (except where permitted or required by law), but you hereby consent and authorize use to provide and/or disclose your Personal Data to the following categories of parties:

- (a) any person to whom we are compelled or required to do so under law or in response to a legitimate instruction from a competent or government agency;
- (b) pursuant to an order of a court of competent jurisdiction;
- (c) any Companies (its related corporations and business units) , including those

- established in the future, whether within or outside of Hong Kong;
- (d) where applicable, third parties or business partners who provide related services or products in connection with our business, whether within or outside of Hong Kong;
 - (e) government agencies, statutory authorities and industry regulators;
 - (f) organizations including their professional service providers and relevant regulatory authorities whether within or outside Hong Kong, in connection with the acquisition, disposition and/or intended acquisition or disposition of any of the Companies' assets and/or of any of the Companies itself whether directly or indirectly;
 - (g) our auditors, consultants, accountants, lawyers or other financial or professional advisers; and/or
 - (h) our sub-contractors or third party service or product providers as we may determine to be necessary or appropriate including without limitation, our mailing vendors, as well as vendors that carry out promotional operations on our behalf, whether within or outside of Hong Kong.

Please be rest assured that consistent with the law, we will only disclose the minimum amount of information which we deem necessary for the purpose and that we will take all appropriate safeguards to ensure the integrity and security of the personal data.

4. Cookies

A cookie is a small piece of data that a website can store on your computer or mobile device. We may use cookies on our Sites for the purposes of (i) enabling or facilitating certain features and functions of our Sites in the provision of our online services to you, or (ii) tracking the use of links between our Sites and the websites of our partners or affiliates. You may choose to configure your internet browser settings to manage or restrict the use of cookies, but this may result in delay or loss of functionality in the use of our Sites.

5. Third Parties

We may also occasionally include or offer third party products, services or links on our Sites. Each of these third parties/their sites has its own separate and independent privacy policy. We are not responsible for any such third parties, the content and activities of their sites, or any Personal Data that you may provide to them.

6. Protection of Personal Data

We take all reasonable precautions, including administrative, technical and physical

measures, to safeguard your Personal Data against accidental loss, theft, misuse, unlawful processing and damage as well as against unauthorised or accidental access, disclosure, alteration and destruction.

7. Access to, correction of and retention of Personal Data

7.1. Generally, you can keep your Personal Data accurate, complete and up to date by updating your details in your Account with us if you are a subscriber, or by contacting us as described at the beginning of this Privacy Policy.

7.2. We will retain your Personal Data only for the period necessary to fulfil the purposes outlined in this Privacy Policy, unless a longer retention period is required or permitted by law.

8. General

8.1. If you wish to access, verify, correct, withdraw your consent or communicate with us on any matter relating to your Personal Data, please contact us as described at the beginning of this Privacy Policy. We may charge a reasonable fee for the processing of any data access request. In the case of a withdrawal of consent, you agree that your consent will remain in place until such withdrawal has been officially received by us in writing.

8.2. If you withdraw your consent to any or all use of your Personal Data, any existing contractual relationships that we have with you may be affected, including our not being able to continue providing our Products or Services to you or your being in breach of your contractual obligations to us. In any such event, our legal rights and remedies are expressly reserved.

8.3. This Privacy Policy is applicable to Hong Kong. We reserve the right to add to, revise or delete any part or all of this Privacy Policy as permitted under the applicable laws of these jurisdictions.

8.4 Language. This Privacy Policy has been drawn up in the English language and all versions hereof in any other language shall be for understanding and accommodation purpose only. In case of discrepancies between the English text version of this Privacy Policy and any translation, the English version shall prevail.

Last update: 19th March 2024