

PRIVACY POLICY

This Privacy Policy informs you that **Asia Win Inc Limited** and its associated companies may collect, record, hold, store, use, disclose, and/or process (collectively “Process” or “Processing”) your Personal Data (as defined below) in accordance with its commitment to respecting individual privacy, sound business practices, and compliance with the applicable laws of Hong Kong.

GUGU, the trading name of **Asia Win Inc Limited**, is referred to as “GUGU,” “we,” “us,” or “our” in this document. When we refer to the Service, we mean any portion, aspect, or feature of our services. 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, submitting information to us, using any of our websites, mobile applications, or social media sites (collectively, “Sites”), subscribing or registering for any event or account (“Account”) with us, 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 as outlined in this Privacy Policy.

If you have any questions about our Privacy Policy or your Personal Data, please contact us at **support@gugu.fund**.

We may update this Privacy Policy from time to time through our website to reflect 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, 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, including but not limited to:

- Contact details: home address, billing address, phone number, email address, etc.
- Payment details: bank account or credit card information.
- Verification details: identity verification information such as a national ID or passport number.
- Online session data: browser type, operating system, and domain name.
- Photographs or videos taken at events or seminars.
- Any information deemed necessary in connection with your commercial relationship with us.

1.2 **Scope:** Personal Data may be collected when you:

- Interact with us online or offline.
- Register for an account or participate in our events or promotional activities.
- Use our Sites, which may collect cookies or publicly accessible information.

1.3 If you provide Personal Data about others (e.g., employees, family members), you must have obtained their consent for such disclosure in accordance with this Privacy Policy.

1.4 You must ensure all Personal Data submitted to us is accurate, complete, and true to the best of your knowledge.

2. Purpose and Use of Personal Data

We may use your Personal Data for:

- Communicating with you about your account, payments, events, and updates.

- Sending promotional communications (with an option to unsubscribe).
- Customizing user experience and conducting marketing activities.
- Compliance with legal and regulatory requirements.
- Responding to customer inquiries and improving our services.
- Any other purposes reasonably related to the above.

3. Disclosure of Personal Data

We generally do not disclose or share your Personal Data with third parties, except as follows:

- To comply with legal or regulatory obligations.
- To business partners providing related services or products.
- To auditors, consultants, and professional advisors.
- To sub-contractors or service providers, such as mailing vendors or promotional agencies.

We ensure that appropriate safeguards are in place to protect your Personal Data during such disclosures.

4. Cookies

We may use cookies on our Sites to:

- Enable certain features of the Sites.
- Track usage of links between our Sites and partner websites.

You can manage or restrict cookies via your browser settings, but this may affect the functionality of the Sites.

5. Third Parties

Our Sites may include links to third-party websites or services. Each third party has its own privacy policy, and we are not responsible for their practices or your Personal Data provided to them.

6. Protection of Personal Data

We take reasonable precautions, including administrative, technical, and physical measures, to safeguard your Personal Data against unauthorized access, misuse, or loss.

7. Access to, Correction of, and Retention of Personal Data

7.1 You may update your Personal Data through your Account or by contacting us.

7.2 Personal Data will be retained only as long as necessary for the purposes outlined in this Privacy Policy or as required by law.

8. General

8.1 You may access, verify, correct, or withdraw your consent regarding your Personal Data by contacting us. Please note that withdrawing consent may affect our ability to provide services to you.

8.2 This Privacy Policy applies to Hong Kong and may be revised as permitted by law.

8.3 In case of discrepancies between the English version of this Privacy Policy and translations, the English version shall prevail.

Last update: 19th March 2024