

PRIVACY POLICY

This Privacy Policy is to inform 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 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 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 our websites, mobile applications, or social media sites, subscribing or registering for an 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 and the terms of this Privacy Policy.

This Privacy Policy supplements (but does not supersede or replace) any other consents you may have provided or will provide to us and is in addition to any rights 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 response to changes in legal or regulatory requirements. By continuing to interact with us, you consent to be bound by the prevailing terms of this Privacy Policy, as updated.

1. Collection of Personal Data

1.1 Personal Data

“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. This may include:

- Contact details: home address, correspondence address, billing address, phone numbers, and email address.
- Compensation/payment details: bank account and credit card details.
- Verification details: information used to verify identity.
- Optional details: age, gender, salary range, employment details, education, hobbies, etc.
- Data relating to online sessions: browser type, operating system, domain name.
- Photographs and/or video recordings of seminar or event attendees.
- Account ID with third-party platforms.
- Information about investments.

1.2 Sources of Data

We may collect Personal Data from:

- Information you provide through registration, interactions, or inquiries.
- Promotional activities.
- Cookies stored on your device.
- Publicly available information.

1.3 Third-Party Personal Data

If you provide us with Personal Data relating to other individuals, such as family members or employees, you represent and warrant that you have obtained their consent to share such data with us.

1.4 Accuracy of Data

You must ensure that all Personal Data you provide is complete, accurate, and up to date.

2. Purpose and Use of Personal Data

We use your Personal Data for the following purposes:

- To communicate with you regarding your account or services.
- To send marketing, promotions, or updates about events.
- To process orders and payments.
- For customer relationship management and support.
- To comply with legal or regulatory requirements.
- To improve our services and conduct research.
- For fraud prevention, crime detection, or other security purposes.

3. Disclosure of Personal Data

We may disclose your Personal Data to:

- Relevant government agencies or legal authorities.
- Companies within our corporate group.
- Business partners providing services on our behalf.
- Auditors, consultants, and professional advisors.
- Sub-contractors or service providers as necessary.

We ensure that only the minimum necessary information is shared and take measures to protect your data.

4. Cookies

Cookies are small data files stored on your device when you visit our website. These may be used to:

- Facilitate features of our website or services.
- Track usage and interactions for analytics purposes.

You may manage cookies via your browser settings, though this may affect functionality.

5. Third-Party Services

Our website and applications may include links to third-party websites or services. Each third party has its own privacy policies, and we are not responsible for their content, activities, or handling of your Personal Data.

6. Protection of Personal Data

We take reasonable precautions to safeguard your Personal Data from loss, theft, misuse, unauthorized access, or damage. However, no system can be completely secure, and transmission of data is at your own risk.

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

7.1 Access and Correction

You can update your Personal Data via your account or by contacting us directly.

7.2 Retention

We retain Personal Data only as long as necessary for the purposes outlined in this Privacy Policy or as required by law.

8. General

8.1 Contact and Withdrawal of Consent

To access, correct, or withdraw consent for the use of your Personal Data, contact us at **support@gugu.fund**. Note that withdrawal of consent may affect our ability to provide services to you.

8.2 Updates to Privacy Policy

This Privacy Policy may be revised from time to time to comply with applicable laws.

8.3 Language

This Privacy Policy is written in English, and any translations are for reference only. In case of discrepancies, the English version will prevail.

Last Update: 19th March 2024