

PRIVACY POLICY

We respect your privacy and are committed to protecting it through our compliance with this policy. This Privacy Policy describes how we at Excelcius Limited and our family of companies, including our affiliates and subsidiaries (collectively, “we” or “Excelcius”) collect, use and share the Personal Information that we gather through the websites, mobile apps, platforms and other digital properties that are owned and operated by Excelcius and that link to this Privacy Policy (collectively, the “Services”).

The Excelcius subsidiary or affiliate who owns and operates the Service that you are visiting will be the data controller responsible for the collection and use of your Personal Information.

This Privacy Policy is subject to occasional revision, and if we make any material changes in the way we use your Personal Information, we will prominently post notice of the changes on the Services and update the effective date above. If you have any questions about this Privacy Policy or our information practices, please contact us using the options provided below.

Please read this Privacy Policy carefully. By using our Services, you consent to the information practices and other terms set forth in this Privacy Policy.

HOW WE COLLECT, USE AND RETAIN PERSONAL INFORMATION

When we use the term “Personal Information,” we mean information that can be used to identify you as an individual person. We collect several categories of Personal Information through our Services, including information you provide, information collected automatically from your device, and information we obtain from third party sources. We use and share this Personal Information for the purposes described below, including as described under Additional Uses of Personal Information.

We rely on separate and overlapping bases to process your Personal Information lawfully. By way of example only, it may be necessary for us to process your Personal Information in certain ways in order to process a transaction you have requested or otherwise in accordance with a contract between us, or in certain cases we may process your Personal Information where necessary to further our legitimate interests, where those legitimate interests are not overridden by your rights and interests.

1. Information You Provide

We collect Personal Information you provide, for example when you enter the information into form fields on our Services. For example, we may collect:

Category of Personal Data	Purposes of Processing (see also Additional Uses of Personal Information below)	Legal Basis for Processing
Contact Information including your name, home address, email address and phone number	To administer your account and the Services, authenticate you as a user, and communicate with you	To process transactions requested by you and meet our contractual obligations Legitimate interests Your consent, where applicable

Demographic Information including your age, information about your household, product preferences and other interests	To better understand and analyze our customer population, support our operations including inventory and product management, to deliver relevant offers and ads, to improve our products and services including the	Legitimate interests Your consent, where applicable
Online Purchase Information including payment card information, purchase details and other transaction information	To process purchases you make online, deliver purchased products and services, improve our e-commerce platform, personalize your customer experience and contribute to our marketing efforts, for example, by analyzing information about what products are viewed, when you browse items but do not make a purchase and other interactions you have with our e-	To process transactions requested by you and meet our contractual obligations Legitimate interests Your consent, where applicable
Employment Application Information including your contact information, employment and education history, and other information you include in your CV/resume or application materials, as well as information collected for background checks where required	To process and evaluate job applications you submit through the Services and to communicate with you about your job applications and requests	Legitimate interests Your consent, where applicable

2. Information Collected Automatically

As is true of most digital platforms, we gather certain information automatically when you use our Services. This information may include browser, device, cookie and similar data that we collect as follows:

Category of Personal Data	Purposes of Processing (see also Additional Uses of Personal Information below)	Legal Basis for Processing
Log Files including IP addresses, browser type, internet service provider, referring/exit pages, operating system, date/time stamp and/or clickstream data	To maintain the security of our Services, for fraud detection, and to protect our rights	Legitimate interests
Cookies, Analytics and Related Technologies For more information, including on how to control your privacy settings and your ad choices, read our Cookie Policy	To manage our Services and email messages and to collect and track information about you and your activities online over time and across different websites and online channels	Legitimate interests Your consent, where applicable
Location Information including latitude, longitude, date and time (the precision of this data varies greatly and is determined by factors controlled by your device or mobile service provider)	To offer you certain location-based services, such as delivering advertisements that are relevant to your particular location, and to conduct analytics to improve the Services. You may disable the collection of your location information in your device's settings. Please be advised that we may not be able to provide location-based	Legitimate interests Your consent, where applicable

3. Information We Obtain from Third Party Sources

We may obtain certain Personal Information about you from third party sources, which we may use to serve our legitimate interests, comply with legal obligations, perform a contract, or in some cases, in accordance with your consent.

Business Partners and Service Providers: We use business partners and service providers, such as payment processors and analytics providers, to perform services on our behalf. Some of these partners have access to Personal Information about you that we may not otherwise have (for example, where you sign up directly with that provider) and may share some or all this information with us. We use this

information to administer the Services and conduct marketing and advertising campaigns as well as to process transactions that you request.

Supplemental Information: We may receive additional Personal Information from third-party sources, such as credit reference agencies and public databases, which we may append to existing consumer information, such as email address verification. We may use this supplemental information to process transactions that you request and to prevent fraud, deliver relevant offers and advertising to you and to improve our operations, Services and our advertising and marketing campaigns.

4. Additional Uses of Personal Information

In addition to the uses described above, we may use your Personal Information for the following purposes, which uses may under certain circumstances be based on your consent, may be necessary to fulfil our contractual commitments to you, and are necessary to serve our legitimate interest in the following business operations:

Operating our business, administering the Services and managing your accounts;

Contacting you to respond to your requests or inquiries;

Processing and completing your transactions including, as applicable, order confirmation, enrolment in our loyalty or other programs, processing payments for online purchases and delivering products or services;

Providing you with newsletters, articles, product or service alerts or announcements, savings awards, event invitations, and other information that we believe may be of interest to you;

Providing you with coupons, promotional information, offers, and other information that are personally tailored to your interests and purchase behaviour;

Conducting market research, surveys, and similar inquiries to help us understand trends and customer needs;

Administering our loyalty and rewards programs including allowing you to create and maintain customer profiles, analysing your interactions with us, presenting customized offers, and improving our products, services, programs, and other offerings;

Alerting you about a product safety announcement or recall or correction of an offer, promotion, or advertisement;

Administering sweepstakes and promotions or contacting you regarding a contest prize;

Preventing, investigating, or providing notice of fraud, unlawful or criminal activity, or unauthorized access to or use of Personal Information, our website or data systems; or to meet legal obligations;

Enforcing our Terms and Conditions and other agreements; and,

Sending you text messages or push notifications when you sign up for one of our messaging programs. These messages may be sent by automated means. You may opt out of a text message program by following the instructions in the "Your Privacy Choices" section.

5. Legitimate Interests

We rely on several legitimate interests in using and sharing your Personal Information. These interests include:

improving and customizing the Services for you;

understanding how the Services are being used;

obtaining insights into usage patterns of the Services;

exploring ways to develop and grow our business;

ensuring the safety and security of the Services; and

enhancing protection against fraud, spam, harassment, intellectual property infringement, crime and security risks.

6. Data Retention

We will retain your Personal Information for as long as is necessary for the purposes set out in this Privacy Policy, unless a longer period is required under applicable law or is needed to resolve disputes or protect our legal rights, all in accordance with the principles set forth in Article 5(1) of the GDPR.

Where we are processing Personal Information based on our legitimate interests, we generally will retain such information for a reasonable period of time based on the particular interest, taking into account the fundamental interests and the rights and freedoms of data subjects.

Where we are processing Personal Information based on your consent, we generally will retain the information for the period of time necessary to fulfill the underlying agreement with you, subject to your right, under certain circumstances, to have certain of your Personal Information erased (please see the Your Rights section below).

Where we are processing Personal Information based on contract, we generally will retain the information for the duration of the contract plus some additional limited period of time that is necessary to comply with law or that represents the statute of limitations for legal claims that could arise from the contractual relationship.

In addition, we may face threat of legal claim and in that case, we may need to apply a "legal hold" that retains information beyond our typical retention period. In that case, we will retain the information until the hold is removed, which typically means the claim or threat of claim has been resolved.

HOW WE SHARE AND DISCLOSE PERSONAL INFORMATION

We share your Personal Information with third parties only in the ways described in this Privacy Policy. We may share your Personal Information within our family of companies, with service providers and business partners, in connection with business transfers and to comply with the law, protect health and safety and enforce our legal rights.

Service Providers: We share your Personal Information with third-party service providers who complete transactions or perform services on our behalf or for your benefit, such as for payment processing, marketing, analytics, processing employment applications and performing human resources administration or to verify customer data, such as mailing addresses.

Affiliates: We may share your Personal Information with affiliated legal entities within our family of companies for purposes and uses that are consistent with this Privacy Policy.

Business Partners: With your consent, we may share your Personal Information with business partners, such as our distributors.

Third-Party Platforms: Certain Services may gather and transfer your location information, from and to other applications, functions and tools within your device to enable Excelcius to offer you certain location-based services, such as delivering advertisements that are relevant to your particular location, and to conduct analytics to improve the Services. You may disable the collection of your location information in your device's settings. Please be advised that we may not be able to provide location-based services to you if you choose to do so.

Social Media Platforms: We may also use services provided by third parties (such as social media platforms) to serve targeted ads to you on third party platforms. We may do this by providing a hashed version of your Personal Information to the third

party for matching purposes. Please review our Cookie Policy for more information, including how to opt-out of interest-based advertising.

Legal Process, Safety and Terms Enforcement: We may disclose your Personal Information to legal or government regulatory authorities as required by applicable law. We may also disclose your Personal Information to third parties as required by applicable law in connection with claims, disputes or litigation, when otherwise required by applicable law, or if we determine its disclosure is necessary to protect the health and safety of you or us, or to enforce our legal rights or contractual commitments that you have made.

Business Transfers: Your Personal Information may be disclosed as part of a corporate business transaction, such as a merger, acquisition, joint venture, or financing or sale of company assets, and could be transferred to a third party as one of the business assets in such a transaction. It may also be disclosed in the event of insolvency, bankruptcy or receivership. You will be notified via email or a prominent notice on any affected Service of any change in ownership or uses of Personal Information, as well as your choices regarding Personal Information about you.

INFORMATION SECURITY

Excelcius is committed to protecting the security of your Personal Information. We use technical and organizational measures designed to protect your information against unauthorized access, theft, and loss. However, due to the nature of the internet and information technology in general, we cannot guarantee the security of your information.

INTERNATIONAL DATA TRANSFERS

Excelcius may transfer your Personal Information within our family of companies and/or to the third parties discussed above. Your Personal Information may be transferred to, stored, and processed in a country other than the one in which it was collected. We may transfer your Personal Information outside the European Economic Area ("EEA") and when we do so, we rely on appropriate or suitable safeguards recognized under data protection laws.

With your consent: With respect to our Services operated from servers in the United States, if you are located outside of the United States, please be aware that the personal information we collect will be processed and stored in the United States, a jurisdiction in which the data protection and privacy laws may not offer the same level of protection as those in the country where you reside or are a citizen. In respect of such cross-border personal data transfers, we will obtain your consent to transfer your personal information outside the EEA after first informing you about the possible risks of such a transfer.

Adequacy Decision: With respect to our Services operated from servers in the EEA, we may transfer your Personal Information from the EEA to countries which the European Commission has approved as providing adequate protection to personal information.

Standard Contractual Clauses: The European Commission has adopted standard data protection clauses, which provide safeguards for personal information transferred outside of the EEA. With respect to our Services operated from servers in the EEA, we generally use Standard Contractual Clauses when transferring Personal Information from a country in the EEA to a country outside the EEA that does not have an adequacy decision. You can request a copy of our Standard Contractual Clauses by contacting us as set forth in the Contact Us section below.

In addition, we may transfer your Personal Information outside the EEA if the transfer is necessary to establish, exercise or defend legal claims.

ADDITIONAL POLICIES

Certain websites, mobile applications or other digital properties included in the Services may contain additional disclosures related to your privacy, which will apply to your use of such Service in addition to this Privacy Policy.

CHILDREN'S PRIVACY

We are committed to protecting the privacy of children. Our Services are not directed to, and we do not intend to or knowingly collect or solicit Personal Information online from children under the age of 18. If you are under the age of 18, do not provide us with any Personal Information.

YOUR RIGHTS

We process all personal information in line with your rights, in each case to the extent required by and in accordance with applicable law (including in accordance with any applicable time limits and fee requirements).

Upon request, we will provide you with information about whether we hold any of your Personal Information along with any details required to be provided to you under applicable law. In certain cases, you may also have a right to:

- rectify any of your Personal Information that is inaccurate;
- to restrict or limit the ways in which we use your Personal Information;
- to object to the processing of your Personal Information;
- to request the deletion of your Personal Information, and
- to obtain a copy of your Personal Information in an easily accessible format.

To submit a request, please contact us as set forth in the Contact Us section below. We will respond to your request within a reasonable timeframe.

You also have the right to withdraw your consent to our processing of your Personal Information, where our processing is solely based on your consent. You can do this by discontinuing use of the Services, including by closing all of your online accounts with us and contacting us as set forth in the Contact Us section below to request that your Personal Information be deleted. If you withdraw your consent to the use or sharing of your Personal Information for the purposes set out in this Privacy Policy, you may not have access to all (or any) of the Services, and we might not be able to provide you all (or any) of the Services. Please note that, in certain cases, we may continue to process your Personal Information after you have withdrawn consent and requested that we delete your Personal Information, if we have a legal basis to do so. For example, we may retain certain information if we need to do so to comply with an independent legal obligation, or if it is necessary to do so to pursue our legitimate interest in keeping the Services safe and secure.

If you are accessing the Services from the European Union, you also have the right to lodge a complaint with your national or local data protection authority.

Under California Law, California residents have the right to request in writing from businesses with whom they have an established business relationship, (a) a list of the categories of Personal Information that a business has disclosed to third parties (including affiliates that are separate legal entities) during the immediately preceding calendar year for the third parties' direct marketing purposes and (b) the



names and addresses of all such third parties. To request the above information, please contact us as set forth in the Contact Us section below.

LINKS TO THIRD PARTY SITES AND SOCIAL MEDIA

The Services may include links to websites and digital services operated by third parties. This Privacy Policy does not apply to, and we are not responsible for the content, privacy policies or data practices of third parties that collect your information. We encourage you to review the privacy policies for those third parties to learn about their information practices.

The Services may feature social media "share" buttons and widgets hosted by other companies. These features may collect your IP address, which page you are visiting on our Service and may set a cookie to enable the feature to function properly. The loading, functionality and your use of the plugins are governed by the privacy policy and terms of the third party that provided the plugin.

USER GENERATED CONTENT

Some of our Services may enable users to submit their own content for contests, blogs, videos, and other functions. Please remember that any information you submit or post as user-generated content to the Services become public information. You should exercise caution when deciding to disclose your personal, financial or other information in such submissions or posts. We cannot prevent others from using such information in a manner that may violate this Privacy Policy, the law, or your personal privacy and safety. We are not responsible for the results of such postings.

MANAGING COMMUNICATION PREFERENCES

If you have opted in to our marketing communications (or where permitted by law, if you have provided us with your contact information), we may send you email messages, direct mail offers, push notifications or other communications regarding products or services depending on the method of communication selected. You may ask us not to do so when you access our websites or mobile applications, or change your preferences by updating any accounts you have with us. At any time, you may elect to discontinue receiving commercial messages from us by submitting an opt-out request to the contact information below or by following the unsubscribe instructions in the form of the communication you received, as described below.

Printed Materials: To opt out of receiving printed marketing materials at your postal address, such as advertisements, flyers or postcards, please write to us at the address below. Please be sure to include your name and mailing address exactly as they appear on the printed marketing materials you received.

Emails: To opt out of receiving marketing communications via email, please send an unsubscribe request to the email address below or click on the unsubscribe link at the bottom of the email that was sent to you and follow the directions on the resulting web page. Please note that you may continue to receive certain transactional or account-related electronic messages from us.

Text Messages: If you have consented to receive text messages, you may opt out of receiving them by using the method provided in the text message or by contacting us as set forth in the Contact Us section below.

Push Notifications: To opt out of receiving push notifications, please set your preferences within your device setting menu.



CONTACT US

If you have any questions, comments, requests or concerns about this Privacy Policy or other privacy-related matters, you may contact us in the following ways:

By Email: info@hkexcelcius.com

By Postal Mail:

Excelcius Limited

701 Multifield Plaza

3 Prat Avenue

Tsim Sha Tsui

Kowloon

Hong Kong