

PRIVACY POLICY OF C. STEINWEG (HONG KONG) LIMITED

1. Introduction:

- (a) C. Steinweg (Hong Kong) Limited (the “Company”, “we”, “our” or “us”) is committed to (i) ensuring that we protect personal data which directly or indirectly identify or may identify a natural person (“Personal Data”), which are entrusted to us by our customers (and their officers, directors, agents, employees and representatives), our website visitors, the users of our digital services (“Steinweg Digital Services”) and all those with whom we communicate (“you” or “your”) and (ii) complying with applicable privacy laws, including but not limited to the General Data Protection Regulation (the “GDPR”) and the Personal Data (Privacy) Ordinance (Cap. 486) of Hong Kong (the “PDPO”) (the GDPR and the PDPO collectively, the “Applicable Laws”). We will update this Privacy Policy regularly in order to ensure ongoing compliance with the Applicable Laws and for any other purpose we deem reasonably necessary.
- (b) This Privacy Policy is an external policy and applies to the processing of Personal Data in which we act as the data controller within the meaning of the GDPR and as the data user within the meaning of the PDPO. This is the case when we determine the purpose for and the means for the processing of Personal Data within the purposes of this Privacy Policy.
- (c) The Steinweg Digital Services platforms may also contain links to other websites. This Privacy Policy does not cover the privacy policies and information practices of any such third parties. Those other websites are governed by their own privacy policies or information collection practices, which may be substantially different from ours.
- (d) We may update this Privacy Policy from time to time. In such case, we will notify you in writing and upon your next login to a Steinweg Digital Services platform, subject to paragraph 3(d) below.

2. Types of Personal Data collected:

- (a) We will collect the following types of Personal Data from you:
 - name;
 - business mobile telephone numbers;
 - company address;
 - company email address;
 - date of birth;
 - biometric data, including photographs and other audio-visual material (e.g., voice recordings);
 - employment information (company name and title);
 - Steinweg Digital Services account information;
 - marketing preferences;
 - server logs;
 - visitor information;
 - preferred communication methods;
 - web tracking data
- (i) log information (such as Internet protocol (“IP”) address, mobile device IP address, Internet service provider, GPS location, clickstream data, browser type, version and language, viewed and exit pages and date or time stamps, login information, time zone setting, browser plug-in types and versions, and operating system and platform);
- (ii) visit information (such as full uniform resource locators clickstream to, through and from the Steinweg Digital Services platforms (including date and time), information you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks and mouse-overs), methods used to browse away from the page, and any phone number used to call our customer service number; and
- (iii) device information (such as information about the device you use to access the Steinweg Digital Services platforms, including unique device identifiers, usage information (such as page requests and average time spent on the Steinweg

Digital Services platforms), operating system, browser type and the device's mobile network information and telephone number (if relevant); and

- information required to satisfy our obligations under Applicable Laws.
- (b) We typically collect web tracking data through the use of cookies or similar technologies, such as web beacons or pixel tags. Cookies are small text files that a website sends to the browser on your computer or mobile device when you first visit a web page so that the website can recognise your device the next time you visit. Cookies may be temporary and deleted when you close your browser (i.e., session cookies) or remain until you delete them or they expire (i.e., persistent cookies). Web beacons are electronic images also known as single-pixel gifs. For the purpose of this Privacy Policy, we will refer to cookies and web beacons as "Cookies".
- (c) Generally, Cookies do not contain personally identifiable information, but when you furnish your personal information through a Steinweg Digital Services platform, this information may be linked to the non-personally identifiable data stored in Cookies sent to your browser from a Steinweg Digital Services platform.
- (d) You can view and manage browser Cookies through your browser and/or device settings. However, if you block or disable Cookies, you may not be able to make full use of the Steinweg Digital Services.

3. Purposes of Personal Data processing:

- (a) We collect and process Personal Data for the following purposes:
 - for the performance of the contractual relationship with you, such as for the fulfilment of our contract with you and the processing of your request;
 - to authenticate your identity and your instructions for transactions;
 - to secure the Steinweg Digital Services platforms;
 - to deliver our services;
 - to provide information you request;
 - to allow you to participate in interactive features on the Steinweg Digital Services platforms;
 - to improve the design, functionality, performance and content of the Steinweg Digital Services platforms;
 - for data analysis, testing, research, statistical and survey purposes;
 - to personalise user experience and measure overall effectiveness;
 - to contact you to send you information about our services, and to notify you about changes or updates to the Steinweg Digital Services platforms or our services, including the General Terms and Conditions of C. Steinweg (Hong Kong) Limited and its annexes, including this Privacy Policy;
 - to prevent, detect, investigate and prosecute security threats, fraud, misconduct or other unlawful or malicious activity on the Steinweg Digital Services platforms or in respect of our services;
 - to protect our legal rights, property or safety, or to protect third parties;
 - to comply with our legal obligations and other rules, regulations, codes of practice, and orders and directions of competent regulatory authorities or governmental bodies in Hong Kong or elsewhere that we are obligated to follow;
 - to resolve disputes and enforce our agreements; and
 - for internal operational and administrative purposes.

In respect of cookies specifically, we collect and process cookies for the following purposes:

- to authenticate your identity to facilitate your log-in;
 - to provide information you request;
 - to improve the design, functionality, performance and content of the Steinweg Digital Services platforms; and
 - to personalise user experience and measure overall effectiveness.
- (b) The data processing we undertake is necessary for the operation of our activities. The use of certain Personal Data, such as photographs, audio-visual material (e.g. voice-recordings) and biometric authentication methods (e.g. touch ID technology), is based on our legitimate

interest to ensure your security and authenticate your identity when using the Steinweg Digital Services platforms.

- (c) We are obligated to process your Personal Data in accordance with the above-mentioned purposes and in compliance with the Applicable Laws. Personal Data may not be processed for other purposes other than that for which they were collected. If there is a necessity or need to process Personal Data for other purposes, we shall investigate whether the purposes of the intended data processing are compatible with the original purposes. Prior to that further processing, we shall provide you with information on those other purposes and obtain your consent if further processing is incompatible with the original purposes (unless further processing for those other purposes without your consent is permitted or required under Applicable Laws).
- (d) If you refuse to provide any Personal Data that we identify as being required for us to perform our services or for you to access or use the Steinweg Digital Services (or if you withdraw your consent to our processing of such information), we reserve the right to refuse access to the Steinweg Digital Services platforms and/or to refuse to provide our services.

4. Using and sharing of Personal Data:

- (a) We may share your Personal Data with our associated corporations (“Steinweg Group of Companies”) and our and the Steinweg Group of Companies’ agents, service providers (including suppliers, sub-contractors analytics and search engine providers, business partners), legal representatives and auditors. Any information we share in this circumstance will be used for the purposes specified in this Privacy Policy. We will only share your Personal Data with other third parties with your consent or where required or permitted by applicable laws and regulations.
- (b) We may share your Personal Data in case such disclosure is mandatory under the Applicable Laws or is reasonably judged to be essential in order to protect and safeguard our rights, property and safety and the rights, property and safety of any member of the Steinweg Group of Companies or of other persons. In certain circumstances, it is possible that Personal Data may be subject to disclosure pursuant to judicial or other government subpoenas, warrants, or orders.
- (c) Disclosures to an entity as set out above may entail that we are required to transfer your Personal Data to a third country or international organisations outside of the European union/European Economic Area (“EU/EEA”) or outside Hong Kong, which shall take place only in compliance with the Applicable Laws, and where appropriate safeguards are in place that ensure the level of protection of Personal Data as required by the Applicable Laws (e.g., transfers on the basis of an adequacy decision or standard EU Model clauses). In situations where we transfer Personal Data from the EU/EEA to countries outside the EU/EEA, we will enter into appropriate contractual arrangements with EU Model Clauses.

5. Securing your Personal Data:

- (a) We handle Personal Data carefully and confidentially, and use all suitable and state-of-the-art physical, managerial, and technical safeguards (e.g. encryption, SSL certificates and three-step authentication procedures) to preserve the integrity and security of your Personal Data.
- (b) We have put in place procedures in an effort to safeguard and help prevent unauthorised access, maintain data security, and correctly use the information we collect. We also take reasonable steps to help make sure that third parties we work with protect the security of your Personal Data.
- (c) Where we have given you (or where you have chosen) a password and other unique identifiers which enable you to access certain parts of the Steinweg Digital Services platforms, you are responsible for keeping this password confidential. We ask you not to share the password with anyone, and to sign out of your user account and close your browser window when you wish to exit the Steinweg Digital Services platform. If you are using a shared or a publicly accessible computer or other device, we ask that you ensure that the cache memory on such computer or device is emptied when you close the browser on which the Steinweg Digital Services platform was accessed in order that the contents of the Steinweg Digital Services platform environment may not be viewed by subsequent users of such computer or device.

6. Retention of Personal Data:

We will not use and store Personal Data longer than necessary to fulfil the purposes stated in this Privacy Policy, or longer than necessary to comply with contractual obligations or as permitted or required by the Applicable Laws, and shall remove the collected Personal Data after such period. Personal Data may be stored in accordance with this principle, even where you have deactivated your account with us. We may retain Personal Data for as long as retention is necessary for legal or business purposes (including where we are permitted under applicable laws and regulations to enforce our contract with you).

7. Your rights regarding your Personal Data:

(a) In relation to your Personal Data, you may have the following rights (depending on the location and applicable laws and regulations):

- right to access;
- right to rectification;
- right to erasure (right to be forgotten);
- right to object against or restrict processing (or withdraw an earlier given consent); and
- right to data portability.

You can exercise these rights by contacting our privacy officer in writing (see paragraph 8 below). To protect your privacy and security, we will take reasonable steps to verify your identity before processing any request under this paragraph 7. Please note that, where permitted by law, we reserve the right to charge a nominal fee in respect of our costs in processing your request.

(b) Please note that, depending on your request and based on your location and applicable laws and regulations:

- there may be lawful grounds for us to refuse your request; and
- our response times may vary. Should we require more time than what is permitted by applicable laws and regulations, we shall inform you of the reasons for the delay.

(c) If you believe that we do not comply with privacy and data protection regulations, you may file a complaint with our privacy officer (see paragraph 8 below) or alternatively with the local data protection authority.

8. Contacting us:

We have a procedure in place for any questions or remarks regarding the collection or use of your Personal Data or regarding this Privacy Policy. If there are any queries or remarks about this Privacy Policy; or for requests to exercise your rights relating to your Personal Data, you may contact our privacy officer at:

C. Steinweg (Hong Kong) Limited - Office address: Room 2204 C.C. Wu Building, 302-308 Hennessy Road, Wanchai, Hong Kong

Email: support@steinwegonline.com