

## **PRIVACY POLICY**

### **SnapFLat Limited is committed to protecting and respecting your privacy.**

SnapFlat ensures that all personal data submitted through the Platform are handled in accordance with the relevant provisions of Hong Kong SAR Personal Data (Privacy) Ordinance (the "Ordinance"). SnapFlat respects the User's privacy in collecting, storing and transmitting your personal information. With that, SnapFlat shall endeavor to fully comply with the obligation and requirements of the Ordinance.

*Last Updated: August 26, 2016*

### **When does this Website Privacy Statement apply?**

This Privacy Policy explains the approach taken by SnapFlat toward the personal information and data that we collect about you ("Your Information") when you visit or use the Platform at <https://www.snapflat.hk>, to post your Listing, Property or Personal User Information, or when you send us communications via any computer, mobile or other similar electronic devices.

### **Your consent and rights**

By using our service or visiting our website, you consent to the collection and use of your information as outlined in this policy.

Under the Hong Kong Personal Data (Privacy) Ordinance (the "Ordinance"), individuals have the right: (a) to check whether we hold personal data about you and to access such data; (b) to require us to correct as soon as reasonably practicable any data relating to you that is inaccurate; (c) to ascertain our policies and practices in relation to personal data and the kind of personal data held by us; and (d) to object to the use of your personal data for marketing purposes and we shall not use your personal data for marketing purposes after you communicate your objection to us.

You may exercise your opt-out right by notifying us if you wish to object to the use of your personal data for direct marketing purposes. Please send requests for such objections, access to data, correction of data, information regarding policies and practices and kinds of data held, questions or complaints to [hello@snapflat.hk](mailto:hello@snapflat.hk).

## **A. COLLECTION OF YOUR PERSONAL INFORMATION**

### **1. Collection of personal information**

We collect personal information from our Users. Users are required to create an account to be able to access certain portions of our Platform, such as to list a property or schedule a viewing. The type of personal information that we collect from you varies based on your particular interaction with our Platform.

During the Account registration process, we will collect information such as your name, phone and email address. When you sign an Agency Agreement, we may also ask you to share your home address and HKID number (both legal requirements).

## **2. Collection of automatic information, use of cookies and other tracking devices**

We and our third party service providers, which may include ad networks, analytics companies, use cookies, web beacons, and other tracking technologies to collect information about your use of our Platform and Services, such as your browser type, your ISP or operating system, your domain name, your access time, the URL of the previous website you visited, your page views, your IP address, and the type of device that you use. We also track how frequently you visit our Platform and use our Services. We use this information (including the information collected by our third party service providers) for Platform analytics (including to determine which portions of our Platform are used most frequently, what our users like/do not like), to assist us in determining relevant advertising (both on and off our Platform), to evaluate the success of our advertising campaigns, and as otherwise described in this policy. Currently, we do not honor browser requests not to be tracked.

**Cookies.** We and our third party service providers collect information from you by using cookies. A cookie is a small file stored on user's computer hard drive containing information about the user. The cookie helps us analyze web traffic or informs us about your use of a particular website. Cookies allow web applications to respond to you as an individual, tailoring its operations to your needs, likes and dislikes by gathering and remembering information about your preferences. When you visit the Platform, we may send one or more cookies (i.e., a small text file containing a string of alphanumeric characters) to your computer that identifies your browser.

**Disabling Cookies.** You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you disable cookies, you may be prevented from taking full advantage of the Platform because it may not function properly.

## **B. HOW SNAPFLAT USES THE INFORMATION WE COLLECT**

We collect your personal information and aggregate information about the use of our Platform and Services to better understand your needs and to provide you with a better Platform experience. Specifically, we may use your personal information for any of the following reasons:

- To provide our Services to you, including registering you for our Services, verifying your identity and authority to use our Services, and to otherwise enable you to use our Platform and our Services;
- For customer support and to respond to your inquiries;
- For internal record-keeping purposes;
- To improve and maintain our Platform and our Services;
- To periodically send promotional emails, which you may unsubscribe from at any time;
- For direct marketing purposes. Please note that: (a) your name, contact details (including address, contact number, email address), user behavior, background and demographic data held by us from time to time may be used by us in direct marketing; (b) the following classes of services, products and subjects may be marketed in direct marketing: (i) services and products related to our site and/or our affiliates (including marketing affiliates programs we are a part of); (ii) reward, loyalty or privileges programs, promotional offers and related services; and (iii) invitations to events such as seminars/webinars/tele-seminars, conferences, live programs or events. (c) We may conduct direct marketing via fax, email, direct mail, telephone and other means of

communication or send e-newsletters to you. You may choose not to receive promotional materials, by simply telling us, and we will cease to do so, without charge.

- To contact you via email, telephone, facsimile or mail, or, where requested, by text message, to deliver certain services or information you have requested;
- For SnapFlat's market research purposes, including, but not limited to, the customization of the Platform according to your interests;
- We may use your personal information (i.e. address) to more effectively facilitate the promotion of goods and services to appropriate target audiences and for other research and analytical purposes;
- To resolve disputes, to protect ourselves and other users of our Platform and Services, and to enforce our Terms of Use;
- We also may compare personal information collected through the Platform and Services to verify its accuracy with personal information collected from third parties; and
- We may combine aggregate data with the personal information we collect about you.

## **C. ELECTRONIC NEWSLETTERS, INVITATIONS, POLLS AND SURVEYS**

At our sole discretion, SnapFlat may offer any of the following free services on the Platform, which you may select to use or receive at your option. Certain of the following services may require you to provide additional personal information as detailed below:

### **1. Electronic newsletters**

We may offer a free electronic newsletter to users. We will gather the email addresses of users who sign up for SnapFlat for the newsletter mailing list. Users may remove themselves from this mailing list by opting out of receiving newsletters by following the link provided in each newsletter that points users to a subscription management page where the user can unsubscribe from receiving newsletters.

### **2. Surveys**

We may conduct user surveys from time to time to better target our content to our Platform users. We will not share individual responses from these surveys with any third party apart from the survey provider. We will share aggregate data with third party service providers, partners, and other third parties. We also may post aggregate data containing survey responses on our Platform; that data may be viewed and downloaded by other users of our Platform.

## **D. CHILDREN'S PRIVACY**

Our Services are not designed for children under 18. SnapFlat requires that only persons 18 years of age or older use the Platform and/or the Services. By using the Platform and/or the Services, you hereby represent that you are at least 18 years old. If we discover that a child under 18 has provided us with personal information, we will delete such information from our systems.

## **E. SECURITY**

We employ appropriate physical, procedural and technological security measures, which are reasonably designed to help protect your personal information from unauthorized access or disclosure. SnapFlat may use encryption, passwords, and physical security measures to help protect your personal information against unauthorized access and disclosure. No security measures, however, are 100% complete. Therefore, we do not promise and cannot guarantee, and thus you should not expect, that your personal information or private communications will not be collected and used by others. You should take steps to protect against unauthorized access to your password, phone, and computer by, among other things, signing off after using a shared computer, choosing a robust password that nobody else knows or can easily guess, and keeping your log-in and password private. SnapFlat is not responsible for the unauthorized use of your information nor for any lost, stolen, compromised passwords, or for any activity on your Account via unauthorized password activity.

## **F. DISCLOSURE**

As a standard practice, we do not share any personally-identifiable or private customer information with third parties, unless they are acting as an intermediary. However, in some exceptional circumstances, we may share the information that we collect about you, including your personal information, as follows:

### **1. Information disclosed to protect us and others**

We may disclose your personal information to prevent an emergency, protect or enforce our rights, enforce our Terms of Use and/or to protect the safety of users of our Platform and our Services or protect or enforce the rights of a third party, or as required by law.

### **2. Information disclosed to third party service providers and business partners**

We may contract with various third parties for the provision and maintenance of the Platform, Services and our business operations, and SnapFlat may need to share your personal information and data generated by cookies and aggregate information (collectively, "information") with these vendors and service agencies. The vendors and service agencies are only permitted to use your personal information as necessary to perform its obligations to provide the Services to you. If you complete a survey, we also may share your information with the survey provider; if we offer a survey in conjunction with another entity, we also will disclose the results to that entity.

### **3. Disclosure to non-affiliated third parties in furtherance of your request**

Your request for services may be shared with third party websites with whom we have a contractual relationship in order to provide your request with maximum exposure. The post on the third party website will include the details of your request, but will not include your last name.

#### **4. Disclosure to other users of our platform**

When you book a viewing as Flat Searcher, we will share your first name (not your last name) with the Departing Tenant in order to facilitate your communication (i.e. we will provide you with the departing tenant's phone number, in order to be able to call him when you arrive at the flat and to make sure that you quickly find your way to the flat. The departing tenant will know your first name in order for him/her to identify you as the right visitor of the flat).

As Departing Tenant, we will share your phone number with the Flat Searchers that booked a viewing in your flat, in order for them to be able to call you when they arrive at your flat and to make sure that they quickly find their way to your flat. You as Departing Tenant will be able to choose the phone number you would like to share with the Flat Searchers (e.g. your personal number, the number of your maid).

In addition, we may post the results (in aggregate form) of surveys to our Platform.

#### **5. Information disclosed to law enforcement or government officials**

We will disclose your information, including, without limitation, your name, city, telephone number, email address, user ID history, booking and listing history, and fraud complaints, to law enforcement or other government officials if we are required to do so by law, regulation or other government authority or otherwise in cooperation with an investigation of a governmental authority.

#### **6. In the event of a change of control or bankruptcy**

In the event that SnapFlat undergoes a change in control, including, without limitation, a merger or sale of all or substantially all of SnapFlat's assets to which this Platform relates or other corporate reorganization in which SnapFlat participates, and is thus merged with or acquired by a third party entity (a "Successor"), SnapFlat hereby reserves the right to transfer the information we have collected from the users of the Platform and/or Services to such Successor.

In addition, in the event of SnapFlat's bankruptcy, reorganization, receivership, or assignment for the benefit of creditors, or the application of laws or equitable principles affecting creditors' rights generally, SnapFlat may not be able to control how your information is transferred, used, or treated and reserves the right to transfer the information we have collected from the users of the Platform and/or Services to non-affiliated third parties in such event.

#### **7. Information disclosed at your request**

We may share your personal information with other Registered Users to whom you explicitly ask us to send your information or if you explicitly consent to such disclosure upon receipt of a specific Service. For instance, if a Landlord registered with SnapFlat requests a copy of your employment contract before signing you off as his new tenant, SnapFlat will inform you about this request. If you agree, SnapFlat will send the required documents to the registered user (in this case the landlord).

## **8. Aggregate or de-identified data**

SnapFlat may aggregate and/or de-identify information collected by the Platform and Services or via other means so that the information does not identify you. Our use and disclosure of aggregated and/or de-identified information is not subject to any restrictions under this Privacy Policy, and we may disclose it to others without limitation for any purpose.

## **G. LINKS TO EXTERNAL PLATFORMS**

The Platform may contain links to other websites or resources over which SnapFlat does not have any control. Such links do not constitute an endorsement by SnapFlat of those external websites. You acknowledge that SnapFlat is providing these links to you only as a convenience, and further agree that SnapFlat is not responsible for the content of such external websites. We are not responsible for the protection and privacy of any information which you provide while visiting such external websites and such sites are not governed by this Policy. Your use of any external website is subject to the terms of use and privacy policy located on the linked to such external website.

## **H. UPDATING, DELETING AND CORRECTING YOUR PERSONAL INFORMATION**

You may choose to restrict the collection or use of your personal information in the following ways: You can review, correct and delete your personal information in the Platform. You must promptly update your personal information if it changes or is inaccurate. Typically, we will not manually alter your personal information because it is very difficult to verify your identity remotely. Nonetheless, upon your request we will close your Account and remove your personal information from view as soon as reasonably possible, based on your Account activity and in accordance with applicable law. We do retain information from closed Accounts in order to comply with the law, prevent fraud, collect any fees owed, resolve disputes, troubleshoot problems, assist with any investigations of any Registered User, enforce our Terms of Use, and take any other actions otherwise permitted by law that we deem necessary in our sole and absolute discretion. You should understand, however, that once you post a Listing, Offer, Feedback, or any other information onto the Platform, you may not be able to change or remove it. Once we have deleted or removed your Account, you agree that SnapFlat shall not be responsible for any personal information that was not included within your deleted and/or removed Account that remains on the Platform.

## **I. WHAT CHOICES DO I HAVE REGARDING USE OF MY PERSONAL INFORMATION?**

We may send periodic promotional or informational emails to you. You may opt-out of such communications by following the opt-out instructions contained in the email. Please note that it may take up to 10 business days for us to process opt-out requests. If you opt-out of receiving emails about recommendations or other information we think may interest you, we may still send you emails about your Account or any Services you have requested or received from us.

## **J. THIRD-PARTY AD NETWORKS**

We may participate in third party ad networks that may display advertisements on other websites based on your visits to our Site as well as other websites. This enables us and these third parties to target advertisements by displaying ads for products and services in which you might be interested. Third party ad network providers, advertisers, sponsors and/or traffic measurement services may use cookies, JavaScript, web beacons (including clear GIFs), Flash LSOs and other technologies to measure the effectiveness of their ads and to personalize advertising content to you. These third party cookies and other technologies are governed by each third party's specific privacy policy, not this one. We may provide these third-party advertisers with information about your usage of our Site and our services, as well as aggregate or de-identified information about visitors to our Site and users of our service.

## **K. YOUR FULL NAME AND USE OF SNAPFLAT INFORMATION**

### **1. YOUR FULL NAME**

As a Registered User of the Platform you will select a Full Name during the registration process. All of your activities on the Platform will be traceable to your Full Name.

### **2. USING INFORMATION FROM SNAPFLAT**

The Platform facilitates your sharing of personal information with others in order to e.g. negotiate a rent or sign a tenancy agreement. If you want to make an offer for a flat as Flat Searcher or agree to sign a tenancy agreement with the Landlord, you may need to reveal your name, email, phone number, HKID number or personal address to that individual so that the landlord signs the tenancy agreement (this is a legal requirement). Please respect the privacy of others. You agree to use the information of other users solely for the following purposes: (a) Entering into a Tenancy Agreement as Flat Searcher or Landlord; and (b) Communicating with the Flat Searcher or Departing Tenant regarding flat viewings (e.g. when a Flat Searcher arrives at a flat for a viewing, he/she can call the Departing Tenant on a number provided by the Departing Tenant, in order to facilitate the communication and viewing).

### **3. ACCOUNT PROTECTION**

Your password is the key to your Account. When creating your password you should use unique numbers, letters, special characters, and combinations thereof. In addition, DO NOT disclose your password to anyone. If you do share your password or your personal information with others, you are solely responsible for all actions taken via your Account. If you lose control of your password, you may lose substantial control over your personal information and be subject to legally binding actions taken on your behalf. Thus, IF YOUR PASSWORD HAS BEEN COMPROMISED FOR ANY REASON, YOU MUST IMMEDIATELY NOTIFY SNAPFLAT TO CHANGE YOUR PASSWORD.

## **L. USER GENERATED CONTENT**

When you list your space as Departing Tenant or Landlord, we ask you to post content on our Platform, including but not limited to, the flat pictures or description. If you post content to our Platform, all of the information that you post will be first reviewed by SnapFlat before we advertise it online. SnapFlat reserves the right to edit or delete the user-generated content.

## **M. PRIVACY POLICY UPDATES**

THIS POLICY IS CURRENT AS OF THE EFFECTIVE DATE SET FORTH ABOVE. SNAPFLAT MAY, IN ITS SOLE AND ABSOLUTE DISCRETION, CHANGE THIS POLICY FROM TIME TO TIME BY UPDATING THIS DOCUMENT. SNAPFLAT WILL POST ITS UPDATED POLICY ON THE WEBSITE ON THIS PAGE AND FOR ANY MATERIAL CHANGES TO THIS POLICY WILL POST NOTICE OF THE UPDATED POLICY IN ADVANCE OF ITS EFFECTIVE DATE. SNAPFLAT ENCOURAGES YOU TO REVIEW THIS POLICY REGULARLY FOR ANY CHANGES. YOUR CONTINUED USE OF THIS WEBSITE AND/OR CONTINUED PROVISION OF PERSONAL INFORMATION TO US WILL BE SUBJECT TO THE TERMS OF THE THEN-CURRENT POLICY.

## **N. NOTICE TO NON-HONG KONG USERS**

Our computer systems are currently based in the Hong Kong, so your personal data will be processed by us in Hong Kong where data protection and privacy regulations may not offer the same level of protection as in other parts of the world. If you create an Account with the Platform as a visitor from outside Hong Kong, by using the Platform, you agree to this Policy and you consent to the transfer of all such information to Hong Kong, which may not offer an equivalent level of protection of that required in other countries, and to the processing of that information as described in this Policy.

## **O. CONTACT INFORMATION**

If you have any questions about the Privacy Policy or the Services, please contact us by sending an email to [hello@snapflat.hk](mailto:hello@snapflat.hk).