

# **PRIVACY POLICY**

## **Our Commitment**

Tradelink Electronic Commerce Limited (hereinafter referred to as “Tradelink”, “the Company”, “We”, “our” or “us”) respects the privacy rights of our customers and their authorised signatories (for body corporates) (hereinafter referred to as “you” or “your”) and we are committed to safeguarding your privacy and ensuring that your personal data is protected. This Privacy Policy explains, among other things, the types of personal data we collect and how we process and protect that data.

We shall keep your personal data confidential and shall ensure that our policies and practices with respect to the collection, use, retention, disclosure, transfer, processing, security and access of your personal data comply with the Personal Data (Privacy) Ordinance (Cap.486, Laws of the Hong Kong Special Administrative Region) (“PDPO”), as amended from time to time.

The term “personal data” shall have the meaning as ascribed to it under the PDPO.

## **Personal Information Collection Statement (“PICS”)**

This PICS is issued pursuant to the PDPO in relation to the operation of our business.

### **1. Definitions**

Under this PICS, unless the context otherwise requires, the following words and expressions shall have the following meanings:

- 1.1 “Customers” means our customers.
- 1.2 “EDI Messages” means data structured in accordance with an internationally agreed standard and any other standard as Tradelink considers appropriate and transmitted by electronic means through Tradelink Services.
- 1.3 “Government” means the Government of Hong Kong.
- 1.4 “Hong Kong” means the Hong Kong Special Administrative Region of the People’s Republic of China.
- 1.5 “Intended Recipient” means any person or party to whom any Messages are intended by the sender to be sent through or incidental to any of the Tradelink Services.
- 1.6 “Messages” means both “EDI Messages” or “Other Messages”.

- 1.7 “Other Messages” means unstructured data electronically transmitted through Tradelink Services, including data received or transmitted through e-mail, flat file transfer and image file transfer.
- 1.8 “Trader Data” means all data, documents, records, text, drawings, diagrams, sound, images and information of whatever nature (in machine readable form or any other form) disclosed, divulged, submitted, supplied or made available to Tradelink (whether electronically or otherwise) by or on behalf of the Trading Community or collected by Tradelink from the Trading Community (whether electronically or otherwise) under or in connection with any contract or agreement signed between Tradelink and Government for Tradelink Government Services.
- 1.9 “Trading Community” means persons who apply for, or deal with, or are otherwise involved in the trade-related documents as specified in any contract or agreement signed between Tradelink and Government for Tradelink Government Services, and any other trade-related documents subsequently agreed between Tradelink and Government.
- 1.10 “Tradelink Government Services” means those Government services provided by Tradelink in accordance with agreements between Government and Tradelink.
- 1.11 “Tradelink Registration Forms” means any of the paper or electronic forms or documents used by the Customers to register with Tradelink to use one or more of the Tradelink Services, to give any instructions to Tradelink, to add or unsubscribe any Tradelink Services, to make any specific authorisations, to amend any records and/or for any other purposes of and incidental to any Tradelink Services.
- 1.12 “Tradelink Services” means all or any of the electronic services from time to time provided by Tradelink.

### ***Purpose of Collection and Use of Personal Data***

2. In order for you to use Tradelink Services, it is necessary for you to provide us with certain essential personal data as required in the Tradelink Registration Forms and other documents in relation to Tradelink Services, including without limitation, all forms for using Tradelink Government Services. If applicable, we may also ask you for other information which helps us to offer you tailored products and services that we think may be of interest to you. The types of personal data we may collect include your name, address, email, telephone number, Hong Kong identity card number and/or your business information such as company name and business title.

3. We shall have the right to collect, hold, process and/or use your personal data in accordance with this PICS. If you are unable or unwilling to provide us with complete and correct personal data, we may not be able to provide or continue to provide Tradelink Services to you.
  
4. Tradelink shall observe the PDPO and procure all staff of Tradelink to comply with the reasonable standards of confidentiality. Your personal data (e.g. telephone number, business and email addresses) will be used for the purposes of:
  - (i) verifying your eligibility and processing your application to subscribe any Tradelink Services;
  - (ii) providing Tradelink Services to you;
  - (iii) providing you with regular communications from us with details of our business and our products and services;
  - (iv) handling of your complaints and inquiries;
  - (v) research and analysis of the data in the aggregate;
  - (vi) marketing, and making suggestions or recommendations of, goods or services provided by Tradelink or Tradelink's subsidiaries, associated companies or business partners: e-commerce, identity management, payment technology, banking and credit and other financial services and products;
  - (vii) detection or prevention of crime;
  - (viii) auditing purposes;
  - (ix) (for Tradelink Government Services only) transferring the same, in machine readable form or in any other form, to Government or a third party appointed by Government to be used for or in relation to the delivery, implementation, provision and/or operation of the Tradelink Government Services or for other trade control or trade facilitation purposes as specified by Government;
  - (x) (for Tradelink Government Services only) using the same for any matching procedure to be carried out by Government or its appointed third party, or such other uses of the same as referred to or contemplated under any contract or agreement that has been signed or may be signed between Tradelink and Government in relation to Tradelink Government Services;
  - (xi) other purposes otherwise expressly agreed between Tradelink and the Customers; and
  - (xii) making disclosures as required by applicable laws.

- I object to the use of my personal data for direct marketing of goods and/or services as mentioned in Clause 4(vi) above.

For the purpose of this Clause 4 (vi) above, Tradelink may not use your personal data unless with your written consent. At any time you object to the use of your personal data for direct marketing of goods and/or services as mentioned in Clause 4(vi) above, you can opt out by sending us an opt-out request to the person and address as specified in Clause 10 below. Upon receipt of your request, we shall cease to use your personal data as soon as possible for direct marketing purpose without charge to you.

### ***Possible Transferees***

5. You agree that Tradelink may disclose and transfer your Trader Data or personal data (e.g. telephone number and business and email addresses) to any of the following parties within the same jurisdiction or from one jurisdiction to another in compliance with the requirements of the PDPO:
  - i. any agent, consultant, contractor, professional advisor or third-party service provider who provides administrative, telecommunications, computer, payment or securities clearing, legal or operation support, or other services to Tradelink in connection with any Tradelink Services;
  - ii. the Government agency, authority or a third party appointed by Government in connection with any Tradelink Government Services or where such disclosure is required or authorised by law;
  - iii. any person where such disclosure is required or authorised by law;
  - iv. (if applicable) any of Tradelink's subsidiaries or associated companies in connection with the purpose of Clause 4(vi) above and have undertaken to keep such information confidential;
  - v. credit reference agencies and, in the event of default, debt collection agencies; and/or
  - vi. any actual or proposed assignee of Tradelink or transferee of Tradelink's rights or obligations.
  
6. Save and except for the above purposes and subject to Clause 5 above, Tradelink shall not disclose the personal data to any third party (other than the Intended Recipient) without the consent of the Customers.

7. Tradelink shall restrict access to personal data to officers, employees, agents, consultants, contractors, professional advisors and service providers of Tradelink who have a need to know or use the data and who have been trained to handle such data and observe confidentiality properly.

***Browsing information collected from you (Cookies)***

8. During your visit to our websites ([www.tradelink.com.hk](http://www.tradelink.com.hk), [www.tradelink-ebiz.com](http://www.tradelink-ebiz.com) and [tplus.ai](http://tplus.ai)), we may use Cookies or other technical means to collect, store and track the identification and contact details of you as a visitor, your login and authentication details, your activities and/or information on your preferences in relation to the subject matter of the websites. We use such personal data and information for the purposes of:
  - (i) operation, management enhancement and optimisation of our websites;
  - (ii) compilation of aggregate statistics on site usage;
  - (iii) maintaining your identity across multiple webpages and/or internet sessions;
  - (iv) personalising your user experience; and
  - (v) marketing and advertising goods and/or services provided or recommended by Tradelink or Tradelink's subsidiaries, associated companies or business partners.
9. Most web browsers are initially set up to accept Cookies. You may refuse to accept Cookies (by modifying the relevant Internet options or browsing preferences of your computer system), but to do so you may not be able to utilise or activate all of the functions and services of our websites.

***Your rights in relation to your Personal Data***

10. You shall have the right to request for access to and correction of your personal data held by Tradelink. Request for access and correction or any inquiries in relation to this Privacy Policy should be in writing and addressed to Privacy Compliance Officer, 11/F & 12/F, Tower B, Regent Centre, 63 Wo Yi Hop Road, Kwai Chung, Hong Kong. Tradelink may charge a reasonable amount of fee for handling such request for access or correction.

### ***Protecting your Personal Data***

11. We maintain appropriate technical and organisational measures to protect your personal data we hold against accidental or unauthorised access, destruction, loss, alteration, processing or use (which includes disclosure or transfer) .
12. Our websites may contain hyperlinks to other websites provided by third parties. We do not control these third-party websites or any of the content contained on those websites. Once you have left our websites, we cannot be responsible for the protection and privacy of any information which you provide. You should exercise caution and look at the privacy statement for the website(s) you visit.

### ***Retention of your Personal Data***

13. Unless there is a mandatory legal, regulatory or contractual requirement for us to keep your personal data for a specified period, we shall only retain your personal data for as long as is necessary to fulfil the purposes for which the same was originally collected.

### **Miscellaneous**

14. If there is any inconsistency or conflict between the English and Chinese versions of this Privacy Policy, the English version shall prevail.
15. We may change this Privacy Policy from time to time by posting an updated version on the our websites ([www.tradelink.com.hk](http://www.tradelink.com.hk), [www.tradelink-ebiz.com](http://www.tradelink-ebiz.com) and [tplus.ai](http://tplus.ai)).
16. This Privacy Policy shall be governed by, and construed in accordance with, the laws of the Hong Kong.

Last updated on : 17<sup>th</sup> January 2026