

1. Introduction

We understand the importance of protecting the personal information received from each individual customer and confidential data from corporate client. This Data Privacy Policy provides information on our obligations.

This Privacy Policy sets out how we collect, use, disclose, share, transfer and store personal data about employees, workers, contractor, subcontractors, job applicants, customers and corporate. We pledge to meet fully, internationally recognised standards of personal information privacy protection, under the regulatory system and in accordance with the General Data Protection Regulation (EU) 2016/279 (“GDPR”) and any data protection laws where we operates businesses. In doing so, we shall ensure compliance by our personnel with the strictest standards of security and confidentiality.

2. What personal information do we collect?

In this Privacy Policy, “personal information” is any information that identifies or can be used to personally identify an individual. We collect, process and use personal information in order to provide our services and solutions, manage and administer our business, improve our services and best adapt our business processes to our clients’ need. The types of personal information we collect or receive during service provisioning may include:

- name, title or position;
- correspondence address and/or billing address;
- contact details, including contact name and telephone number or email address;
- information for the verification of identity, including identification type and identification number;
- information regarding physical, physiological, genetic, mental, economic, cultural or social identity of an individual,

3. How does LTG collect personal information?

We may collect personal information in the following circumstances:

- when you purchase our solutions and services;
- when you trade-in your device to us;
- during communications (either orally or in writing via email or fax etc.) between you and our representatives;
- when we obtain feedback from you about our services and solutions;
- when you register for our events and seminars or subscribe to our mailing lists and newsletters;
- when we market our services and solutions to you;
- when we respond to your inquiries and requests; and
- through your access and use of our website.

4. For what purposes does LTG collect, hold, use and disclose personal information?

We collect, hold, use and disclose on a need to know basis personal information for the following purposes:

- respond to inquiries and requests;
- develop, provide, and improve our services and solutions;
- inform you about our services and solutions;
- obtain feedback from you on our services and solutions;
- update our records and keep contact details up to date;
- enable you to subscribe to our website, newsletters and mailing lists and to register for events and seminars;
- assess and review the performance of our website and to improve its operation;
- process and respond to privacy complaints;
- comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator; to co-operate with any governmental authority of any country; or as we otherwise believe to be necessary or appropriate under applicable law; or
- any other purposes that we obtain your authorisation in a separation notification.

5. To whom do we disclose personal information?

We shall take all practicable steps to keep your personal information confidential but we may disclose your personal information to our direct and indirect subsidiaries for the original purpose for which your personal information was collected and for other purposes set out in paragraph 4 above. We may also disclose your personal information on a need to know basis to:

- any contractor, supplier, agent or other third party who provides business, marketing, and other services to us and under a duty of confidentiality to us;
- a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets or stock; and
- any court, tribunal, or other governmental authorities of any country, or other third party to whom we are under an obligation to make disclosure under the requirement of any law, or for the purposes of any guidelines or codes of practice issued by any regulatory or other authorities with which we are expected to comply.

We do not provide your personal information to any other third parties for their third-party direct marketing purposes.

6. Do we disclose personal information to recipients in other countries?

We may store, process or transfer your personal information to a place outside the country in which you are located, such as in any place where our direct and indirect subsidiaries situate, where we have facilities or where we engage third party service providers, which provide adequate level of protection to your personal information. We assure you that the purpose of any transfer of your personal information is compatible with the original purpose for which your personal information was initially collected and possessed.

7. How does LTG store and secure personal information?

We seek to take reasonable precautions to protect personal information from misuse, loss, unauthorised access, modification or disclosure using a combination of physical, administrative and technical safeguards. We only allow authorised personnel and/or personnel of our contractor to access to your personal information on a “need-to-know” basis.

Our website is linked to the internet, and as the internet is inherently insecure, no data transmission or storage system can be guaranteed to be 100% secure. We cannot provide any assurance regarding the security of transmission of personal information you communicate to us online though we shall take commercially practicable precautions to keep it on the secured server with password-protected if it is stored electronically.

Information collected by us will only be retained as long as necessary to fulfil the purpose for which it was collected.

8. How can you access and correct personal information?

You may at any time (subject to various exceptions and in accordance with data protection legislation in governing jurisdiction) request access to, correction or deletion of your personal information that has been previously provided to us. To exercise any of your rights, please send us a written request marking confidential to the postal or email address set out below. In response, we may ask you to provide certain information about yourself so that we can be sure you are the person to whom the data refers.

9. Access to our Website

Any activity you participate in our website may be recorded. We may log IP addresses (that is, the electronic addresses of computers connected to the internet) to analyse trends, administer the website, track users movements, and gather broad demographic information. By doing so, we can measure traffic and gauge the popularity of various parts of the Website. This information does not identify you as an individual.

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10. Link to Third Party Website

This Privacy Policy applies to this website and other website operated by us or our subsidiaries. We make no representations or warranties in relation to the privacy practices of any third party website that are linking with us. At any other website, the protection of your privacy, personal data and your exposure to cookies are not our responsibility and you are advised to refer to the privacy policy of that website.

11. Retention period

We shall retain your personal information for a period as long as necessary to fulfill the purposes for such information were collected. We shall then destroy your personal information unless a longer retention period is required or permitted by law.

12. Changes to our Privacy Policy

We may update this Privacy Policy from time to time to ensure our compliance with the change of the relevant legislation and prevailing practice. Any updated version of this Privacy Policy will be posted on our website.

13. Contacting us

If you have any questions or concerns about how your personal information is being handled by us, please contact us as follows:

Data Protection Officer

Email: privacy@litong.com

Post: Room 7-11, 15/F, Yale Industrial Centre, No.61-63 Au Pui Wan Street, Fotan, New Territories, Hong Kong.