

Privacy policy

Your privacy is important to us. We are committed to protecting the privacy, confidentiality and security of the personal information we hold by complying with the requirements under applicable laws and regulations. We are equally committed to ensuring that all our employees and agents uphold these obligations. This policy explains how we manage personal information within our organisation.

How we collect personal information?

We collect personal information about you in the following ways:

- when you register for an account on our website;
- when you order products or services from us;
- when you subscribe to our newsletter or fill out a form;
- when you submit a query or request to us; and
- when you apply for a job with us.

In some cases we may be required by law to collect certain types of personal information about you.

Where we collect personal information from you, we will generally do so ourselves. However, in some cases we may collect personal information from a third party, such as through your representatives, contractors who provide services to us, or third parties who refer you to us because they think you may be interested in our products or services.

What information do we collect?

The kinds of personal information that we collect and hold about you may include:

- identifying information, such as your name;
- contact information, such as your e-mail address, mailing address or phone number;
- usernames and passwords that you create when register for an account with us; and
- records of our communications with you, including any messages you send to us.

Without this information, we may not be able to provide you with our products or services (or with all of the features and functionality offered by our products or services) or to respond to queries or requests that you submit to us.

You may, however, visit our site anonymously.

What do we use your personal information for?

We may use your personal information for the following purposes:

- to verify your identify when you are dealing with us;
- to determine your eligibility for any of our products or services;
- to answer your queries or requests;
- to enable us to provide our products and services and personalise your experience by better responding to your individual needs;
- to improve our website based on your information and feedback ;
- to process transactions;
- to send periodic emails for keeping you informed of our activities, such as information and updates pertaining to your order, occasional foundation news, updates, related product or service information;
- to comply with our legal and regulatory obligations (including but not limited to verifying your identity and obtain additional information when appropriate);
- to manage and resolve any legal or commercial complaints or issues; and
- to carry out planning and forecasting activities and other internal processes.

Direct marketing

We may from time to time use your personal information in order to send you marketing materials about products or services that we think you may be interested in (including in some cases products and services that are provided by a third party). We may not use your personal information unless we have received your consent. You can opt-out of receiving marketing communications from us by clicking the "unsubscribe" link on our e-mails or by contacting us at projectstallman@openanx.org.

We may use your following personal information for the purpose of direct marketing:

- identifying information, such as your name;
- contact information, such as your e-mail address, mailing address or phone number;
- products and services portfolio information and demographic data held by us from time to time

We may use your personal information to market the following products and/or services to you, in each case subject to our legal and regulatory obligations:

- purchasing and/or trading digital assets;
- providing, managing or accessing mobile wallets and/or debit cards for holding digital assets;
- over-the-counter digital asset trading; and
- other products or services related to digital assets.

If we use your personal information in any direct marketing communications, you have the right to request that we provide you with the source of that personal information. There is

no fee for requesting this information. We will provide you with the source of the personal information, unless it is impracticable or unreasonable to do so.

Please indicate your consent to receiving information relating to the above by contacting us at projectstallman@openanx.org.

We may also use and disclose your information for other purposes in accordance with your requests or instructions.

How do we protect and store your information?

We implement a variety of security measures to maintain the safety of your personal information when you place an order or enter, submit, or access your personal information. We offer the use of a secure server. All personal information provided to us is transmitted via Secure Socket Layer (SSL) technology and then encrypted into our database, which can only be accessed by those with special access rights to our systems, and are required to keep the information confidential.

We also take steps to monitor access to and modification of your information by our contractors, advisers, consultants and staff members, and ensure that they are aware of and properly trained in their obligations for managing your privacy.

We generally store the personal information that we collect in electronic databases, some of which may be held on our behalf by third party data storage providers. Sometimes we also keep hard copy records of this personal information in physical storage facilities. After a transaction, your personal information will not be kept on file for more than 60 days. At our discretion, we may retain personal information for longer than the said period if we consider it necessary or desirable to do so to meet our legal or regulatory obligations.

Do we use cookies?

Yes, we use cookies to help us remember as well as to process the items in your shopping cart and understand and save your preferences for future visits.

“Cookies” are small text files created and stored on your hard drive by your internet browser software, in order to hold relevant information and the webpage you are currently viewing. Most internet browsers have a facility that will allow you to disable cookies altogether – please refer to your browser’s help menu to find out how to do this. While you will still be able to browse our websites with cookies disabled on your internet browser, some website functionality may not be available or may not function correctly.

Do we disclose any personal information to third parties?

We do not sell or trade your personally identifiable information to any third parties.

We may share personal information about you with:

your representatives, advisers and others you have authorised to interact with us on your behalf;

our staff, contractors, advisors and consultants who need the information to discharge their duties;

related entities within our foundation;

our business partners;

our agents and service providers that assist us in operating our website, providing products and services to you, or otherwise conducting our business;

other parties for marketing, advertising and other uses;

prospective purchasers of all or part of our entity or shares in a related entity;

professional advisers who we engage to provide advice on our business; and

government authorities who ask us to disclose that information, or to other people as required by law.

In some cases the people to whom we disclose your personal information may be located overseas. Further, we may have servers located overseas. There may not be in place data protection laws which are substantially similar to, or serve the same purposes as the applicable data privacy laws in Hong Kong. This means your personal information may not be protected to the same or similar level in Hong Kong.

Access and correction

If you want to access any of the personal information that we hold about you or to correct some aspect of it (eg because you think it is incomplete or incorrect), please contact us using the contact details set out below. To protect the integrity and security of the information we hold, we may ask that you follow a defined access procedure, which may include steps to verify your identity. In certain cases we may charge you an administration fee for providing you with access to the information you have asked for, but we will inform you of this before proceeding. There may be cases where we are unable to provide the information you request, such as where it would interfere with the privacy of others or result in a breach of confidentiality. In these cases we will let you know why we cannot comply with your request.

Even if you do not request access to and/or correct your personal information held by us, if we are satisfied that, having regard to the reasons for which we hold your personal information, that personal information is inaccurate, incomplete, out-of-date, irrelevant or misleading, we may take reasonable steps to correct that information.

Third party links

Occasionally, at our discretion, we may include links to third party products or services on our website. These third party sites have separate and independent privacy policies. Further, we do not verify their content. We therefore have no responsibility or liability for the content and activities of these linked sites. Nonetheless, we seek to protect the integrity of our site and welcome any feedback about these sites.

Your Consent

By using our site, providing personal information and/or using any of our products or services, you agree that:

you consent to this privacy policy, as updated from time to time; and
if you have provided personal information to us relating to any other person, you:
have a right to provide that information;
have provided a copy of this privacy policy, as updated from time to time, to that person;
and
each such person has agreed to those terms.
In such cases, references in this privacy policy to terms such as “you” and “your” also refer to such persons.

Changes to our Privacy Policy

We may make changes to this policy from time to time, to take into account changes to our standard practices and procedures or where necessary to comply with new laws and regulations. The latest version of this policy will be available at www.openanx.org.

Complaints

We try to meet the highest standards in order to protect your privacy. However, if you are concerned about the way in which we are managing your personal information and think we may have breached any applicable privacy laws, or any other relevant obligation, please contact us using the contact details set out below. We will make a record of your complaint and refer it to our internal complaint resolution committee for further investigation. We will deal with the matter as soon as we can, and keep you informed of the progress of our investigation.

If we have not responded to you within a reasonable time or if you feel that your complaint has not been resolved to your satisfaction, you are entitled to make a complaint to the Hong Kong Privacy Commissioner for Personal Data.