



PRIVACY POLICY

BARVAN INTERNATIONAL LIMITED (“Company”) pledges to meet fully with the requirements of the Personal Data (Privacy) Ordinance, Chapter 486 of the Laws of Hong Kong. In doing so, the Company will ensure compliance by its staff to the strictest standards of security and confidentiality in respect of all personal information and data submitted by its customer(s) and prospect(s) (collectively “Customer(s)”) to the Company and the Company will not release such information to anyone without the prior consent of the relevant Customer(s) of the Company except to the authorized persons listed under the section entitled “Disclosure or Transfer of Data”.

Customers are strongly recommended to read this privacy statement (“Privacy Statement”) carefully to have an understanding of the Company’s policy and practices with regard to the treatment of personal information and data provided by the Customers.

If Customers have questions or concerns regarding this Privacy Statement, they should first contact the customer service by email to info@barvan-int.com.

I. Provision of Services

The Company and/or its affiliates provide the following types of service to the Customers:

- a. sale of water sport products, and related products;
- b. provision of warranty, repair and maintenance services related to the above products;
- c. provision of services related to the above and such other consumer and related products which may be accessed via the websites of the Company and their sub-domains (collectively “Websites”) and/or rendered by such other appropriate means of the Company and/or its affiliates (collectively, “Services”).

The Company may engage its affiliates and third party service providers in the provision of Services to the Customers from time to time.

II. Collection of Personal Data

1. Means of Collection of Personal Data

The Company collects the personal information and/or data of Customers by various means including but not limited to the following:

- a. via the Websites;
- b. member, warranty registration forms (whether completed via the Websites or otherwise);
- c. activities enrolment forms (whether completed via the Websites or otherwise);
- d. order forms (whether completed via the Websites or otherwise);
- e. enquiry forms (whether completed via the Websites or otherwise);
- f. forms for repair and maintenance services, contests, surveys, or special offers (whether completed via the Websites or otherwise);
- g. collection and/or exchange of name cards and other personal information, either verbal or written, for and during activities and events either organised by or involving the Company;
- h. via online social networking service platforms (such as Facebook);
- i. written communications between Customers and the staff and personnel;

- j. verbal communications between Customers and the staff and personnel with the Customers being aware of such collection; and
- k. through the above means by the Company's affiliates, third party service providers and corporate clients of the Company for the Company with the Company's authorization.

The Company may collect personal information and/or data of a Customer such as his/her name, address, email address, phone number, age, sex, date of birth, country of residence, nationality, education level, work experience, marital status, number of children and log-in ID and password for getting access to the Websites (if applicable) that is/are not otherwise publicly available. The Company may also automatically collect information like internet protocol (IP) addresses, browser type, referring/exit pages, operating system, date/time stamp, and clickstream data in log files, and link such information and data automatically collected to the personally identifiable information which have been provided to the Company by the Customers (for details of collection of such information please refer to section 5 "Use of Websites of the Company" paragraph 1 "Cookies and Log Files"). Only duly authorized staff of the Company will be permitted to access the Customers' personal information and data, and the Company shall not release such personal information and data to any third parties save and except for the circumstances listed out under the section entitled "Disclosure or Transfer of Data".

1. Purpose of Collection of Personal Data

In the course of using the Services, Customers may disclose or be asked to provide personal information and/or data. In order to have the benefit of and enjoy various Services offered by the Company and/or its affiliates, it may be necessary for Customers to provide the Company with their personal information and/or data. Although Customers are not obliged to provide the information and/or data as requested, the Company may not be able to render certain Services to such Customers in the event that they fail to do so. The Company's purposes for collection of information and data include but not limited to the following:

- a. for the daily operation of the Services provided to Customers;
- b. to identify Customers who have enjoyed and used the Services provided;
- c. to provide Customers with marketing and promotional materials for their enjoyment of benefits provided by the Company to its Customers (for further details, please refer to section headed "Subscription of Newsletter/Promotional Materials/Marketing Materials" below);
- d. to identify Customers who have enjoyed their benefits as Customers by receiving and using marketing and promotional materials;
- e. to allow Customers to enjoy their benefits by enrolling for special events hosted by the Company and/or its affiliates;
- f. to design and provide products and services to Customers in relation to the above purposes; and
- g. to facilitate the Company and/or its affiliates to use the Customers' personal data for purposes relating to the provision of services offered by the Company and marketing services, special events and/or promotions of the Company, its affiliates and/or their respective clients.

If the Customer is under the age of 18, the Company would strongly recommend him/her to seek prior consent from a person with parental responsibility for him/her, e.g. parent or guardian, who may contact the responsible personnel of the Company at , for providing relevant and appropriate personal information and/or data to the Company.

2. Disclosure or Transfer of Data

The Company agrees to take all practicable steps to keep all personal information and data of Customers confidential and/or undisclosed, subject to the following.

Generally speaking, the Company will only disclose and/or transfer Customers' personal information and/or data to the Company's personnel and staff for the purpose of providing the Services to Customers. However, the Company may disclose and/or transfer such information and/or data to third parties under the following circumstances:

a. where the information and/or data is disclosed and/or transferred to any third party suppliers or external service providers who have been duly authorized by the Company to use such information and/or data and who will facilitate the Services provided by the Company and/or its affiliates, under a duty of confidentiality;

b. where the information and/or data is disclosed and/or transferred to any agents, affiliates or associates of the Company who have been duly authorized by the Company to use such information and/or data;

c. where the Company needs to protect and defend its rights and property;

d. where the Company considers necessary to do so in order to comply with the applicable laws and regulations, including without limitation compliance with a judicial proceeding, court order, or legal process served on the Company and/or its affiliates; and

e. where the Company deems necessary in order to maintain and improve the Services.

Personal data collected by the Company may be transferred, stored and processed in any country in which the Company or its affiliates operate. By using the Services, Customers are deemed to have agreed to, consented to and authorized the Company to disclose and/or transfer their personal information and data under the circumstances stated above, as well as to any transfer, disclosure and use of information and data outside of the Customers' country.

3. Subscription of Newsletter/Promotional Materials/Marketing Materials

The Company and its affiliates may from time to time communicate to Customers newsletters, promotional and marketing materials and information, either verbally or in writing, based on the personal information and data that they have provided to the Company. The Company may use Customers' data in direct marketing and the Company requires the Customers' consent (which includes an indication of no objection) for that purpose. In this connection, please note that:

a. the name, contact details, age, sex, date of birth, country of residence, nationality, education level, work experience, marital status, number of children and log-in ID and password for getting access to the Websites (if applicable) of Customers held by the Company from time to time may be used by the Company and/or its authorised personnel or staff in direct marketing

b. the following classes of services, products and subjects may be marketed:

i. all products and services related to the Services provided by the Company and/or its affiliates;

ii. special events hosted by the Company and its affiliates for Customers, including but not limited to courses, workshops, road shows, member or club events, product launches, lucky draws and competitions;

iii. reward, loyalty, membership, club or privileges programmes and related products and services;

iv. special offers including coupons, discounts, group purchase offers and promotional campaigns;

- v. products and services offered by the Company's affiliates and corporate clients (the names of such affiliates and corporate clients can be found in the relevant advertisements and/or marketing or promotional materials for the relevant products and services, as the case may be);
 - vi. donations and contributions for charitable and/or non-profit making purposes
- c. the above products, services and subjects may be provided or (in the case of donations and contributions) solicited by the Company and/or:
- i. the Company's affiliates;
 - ii. third party service providers providing the products, services and subjects listed in paragraph (b) above; and
 - iii. charitable or non-profit marketing organizations;
- d. in addition to marketing the above services, products and subject itself, the Company also intends to provide the data described in paragraph (a) above to all or any of the persons described in paragraph (c) above for use by them in marketing those services, products and subjects, and the Company requires the Customers' written consent (which includes an indication of no objection) for that purpose;
- e. the Company may receive money or other property in return for providing the data to the other persons in paragraph (c) above and, when requesting the Customers' written consent as described in paragraph (d) above, the Company will inform the Customers if the Company receives any money or other property in return for providing the data to the other persons.

Suitable measures are implemented to make available to such Customers the options to "opt out" of receiving such materials. In this regard, Customers may choose to unsubscribe for such materials by contacting the customer service representative of the Company at email to info@barvan-int.com.

4. Access

Any Customer is entitled to request access to or make amendments to his/her own personal information and data kept with the Company by contacting the customer service representative of the Company email to info@barvan-int.com.

In the event that a Customer wishes to access or amend his/her personal information and data, the Company may request him/her to provide personal details in order to verify and confirm his/her identity. HKID card number or passport number or business registration certificate number cannot be amended unless such data is proved to be inaccurate. The Company is required to respond to a Customer's requests within 45 working days of his/her request and will endeavor to do so wherever possible.

5. Use of Websites of the Company

1. Cookies and Log Files

Apart from circumstances where provision of personally identifiable information is expressly requested, when Customers access the Websites, the Company records their visits, the Websites' server software will also record the domain name server address, track the pages the Customers visit, store such information in "cookies" and gather and store information like internet protocol (IP) addresses, browser type, referring/exit pages, operating system, date/time stamp, and clickstream data in log files. All these are done without the Customers being aware that they are occurring. The Company may link such information and data automatically collected in the above manner to the personally identifiable information which have been provided to the Company by the Customers. The Company generally uses such automatically collected information and data to estimate the audience size of the Websites, gauge the popularity of various parts of the Websites, track

movements of Customers on the Websites and number of entries in the Company's promotional activities and special events, measure traffic patterns of the Customers using the Websites and administer the Websites. Such information may also be used by the Company and/or its affiliates for the purpose of marketing its/their respective goods and services. Such automatically collected information and data will not be disclosed save and except in accordance with the section entitled "Disclosure or Transfer of Data".

2. Links to Other Sites

The Websites may provide links to other websites which are not owned or controlled by the Company. Personal information and data from Customers using the Websites may be collected on these other websites when Customers visit such websites and make use of the services provided therein. Where and when Customers decide to click on any advertisement or hyperlink on the Websites which grants Customers access to another website, the protection of Customers' personal information and data which are deemed to be private and confidential may be exposed in these other websites.

All Customers using the Websites are deemed to have consented to the terms of this Privacy Statement. Customers not registered to the Websites who gain access to the Websites, including those Customers who gain access to those Websites via their accounts in online social networking tools (including but not limited to Facebook), are deemed to have consented to the terms of this Privacy Statement, and such Customers' personal data which they have provided to those networking tools may be obtained by the Company and be used by the Company and its authorized persons in and outside of the Customers' country for the purpose of providing services and marketing materials to the Customers. The Company and its authorized personnel may gain access to and use the personal data of such Customers so obtained, subject to the other provisions of this Privacy Statement. This Privacy Statement is only applicable to the Customers utilising the Services provided by the Company and/or its affiliates. Customers are reminded that this Privacy Statement grants no protection to Customers' personal information and data that may be exposed on websites other than the Websites, and the Company is not responsible for the privacy practices of such other websites. Customers are strongly recommended to refer to the privacy policy of such other websites.

6. Security

The security of Customers' personal information and data is important to the Company. The Company will always strive to ensure that Customers' personal information and data will be protected against unauthorized access. The Company has implemented appropriate electronic and managerial measures in order to safeguard, protect and secure Customers' personal information and data.

All personal information and data provided by Customers are only accessible by the authorized personnel of the Company or its authorized third parties, and such personnel shall be instructed to observe the terms of this Privacy Statement when accessing such personal information and data. Customers may rest assured that their personal information and data will only be kept for as long as is necessary to fulfil the purpose for which it is collected. Customers registered to the Websites should safeguard his/her unique Username and Password by keeping it secret and confidential and never share these details with anyone (where applicable).

The Company uses a third party payment gateway service provider to facilitate electronic transactions on the Websites. Regarding sensitive information provided by Customers, such as credit card number for completing any electronic transactions, the browser on the Websites and third party payment gateway communicate such information using secure socket layer technology (SSL).

The Company follows generally accepted industry standards to protect the personal information and data submitted by Customers, both during transmission and once the Company receives it. However, no method of transmission or storage of data, including without limitation transmission over the Internet and storage by electronic means, is 100% secure. Therefore, while the Company strives to protect Customers' personal information and data against unauthorized access, the Company cannot guarantee its absolute security.

Retention of Personal Data

Once the Company has obtained a Customer's personal information and/or data, it will be maintained securely in designated premises and computer systems of the Company and/or its engaged service provider(s). Subject to legal requirements, the personal information and/or data of Customers will be retained by the Company after deactivation of the relevant service until the Customer requests the Company in writing to erase his/her own personal information and/or data from the Company's database or to terminate his/her membership of the Websites (if applicable).

Changes in this Privacy Statement

The Company reserves the right to update, revise, modify or amend this Privacy Statement in the following manner at any time as the Company deems necessary and Customers are strongly recommended to review this Privacy Statement frequently. If the Company decides to update, revise, modify or amend this Privacy Statement, the Company will post those changes to this webpage and/or other places the Company deems appropriate so that Customers would be aware of what information the Company collects, how the Company uses it, and under what circumstances, if any, the Company discloses it.

If the Company makes material changes to this Privacy Statement, the Company will notify Customers by email or by means of a notice on the home page of the Company.

For any query, please contact the Company's customer service representative by email to info@barvan-int.com.

Language

This Privacy Statement is written in both English and Chinese, both of which are equally authentic. In the event of conflict between the two versions, the English version shall prevail.