

隐私政策

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在您注册成为 WindPayer 用户的过程中，您需要完成我们的注册流程并通过点击同意的方式在线签署以下协议，请您务必仔细阅读、充分理解协议中的条款内容后再点击同意：

隐私政策中文版本

一、前言

WindPayer Technology Limited (“WindPayer”或“我们”或“我们的”，其中包括其控股公司，子公司，董事，投资者，雇员等)了解隐私的重要性，并努力对您的个人数据保密。本隐私政策，以及我们的用户协议，规定了我们如何对您的个人数据的进行收集，处理和使用。在本隐私政策中，“个人数据”是指可以识别个人身份的信息，例如姓名，地址，电子邮件地址，交易信息和银行详细信息，但不包括无法识别特定用户的匿名和汇总数据。

本隐私政策语言为英语，并会被翻译成中文。若中文版与英文版本有歧异，应以英文版本为准。

参加我们的用户协议，即表示您同意接受本隐私政策及其任何修订，并允许按照本隐私政策所描述的规定对您的数据进行收集，处理和传输。若本隐私政策和用户协议有冲突，以用户协议为准。

二、基本介绍

为了能够根据任何适用法律以及监管机构不时发布的规则、准则和指令所规定而向您提供我们的服务，我们必须要求您提供有关您本人的某些信息，包括您的身份证明文件、财务信息（例如，关于您的身份、电子商务销售、受益人帐户等的信息）以及适用法律、规则，准则和指令不时要求的其他信息或文件。我们将根据适用的数据保护法律规定来利用您提供的数据，其中应包括但不限于《香港法例》第 486 章《个人资料（私隐）条例》。原则上，我们所获得的信息应仅由我们用于提供我们的服务，并且仅在提供此类服务所必需的范围内使用。原则上，除非我们有任何法律义务或具有管辖权的任何法院指令，或者我们必须这样做才能提供我们的服务（例如将您的个人数据提供给我们在世界任何地方的合作方、电商平台以验证您的数据和进行调查，或者提供给银行以处理资金），否则不应让第三方获取我们所拥有的关于您的信息。在其他情况下，我们将在把您的任何个人数据透露给任何第三方之前获取您的同意。

您的隐私对我们十分重要，WindPayer 秉持以下几条基本原则：

- (1) 除非我们真正需要，否则我们不会要求您提供个人信息。
- (2) 除了为遵守法律，提供我们的服务或保护我们的权利之目的，我们不会与任何人分享您的个人信息。
- (3) 我们将访问您的个人信息限制在需要了解该信息以向您提供服务的关联公司和第三方服务商，或为满足反洗钱，反恐怖主义融资，和其它相关法律规定的要求。
- (4) 我们通过硬件的，电子的和流程上的安全措施，以保护您的个人信息。

请在注册 WindPayer 账户并向我们提供您的个人信息前仔细审阅本隐私政策，如有任何疑问，请即联系我们的 WindPayer 客户支持团队。您也可以咨询自己的法律代表，在与我们建立任何关系之前，他们将为您提供最佳建议。

基于本隐私政策之目的，如果您已经注册了 WindPayer 账户，或者已经使用了 WindPayer 服务，则“WindPayer”，“我们”，“WindPayer 账户”，“第三方服务商”的定义与用户协议一致。

三、访客从网站访问者收集

像大多数网站运营商一样，WindPayer 收集网页浏览器和服务器通常提供的非个人识别信息，例如浏览器类型，语言偏好，引用站点以及每个访问者请求的日期和时间。WindPayer 收集非个人识别信息的目的是为了更好地了解 WindPayer 的访问者如何使用其网站。WindPayer 可能不定时的发布非个人识别信息的整体信息包，比如，网站使用趋势报告。在您登陆的情况下，WindPayer 也可能会收集您的个人识别信息，如 IP 地址。WindPayer 将会完全按照下述个人识别信息的规则使用您的用户 IP 信息。

您可以通过填写我们网站上的表格（例如 WindPayer 帐户注册表格）或通过与联系我们方式（例如通过电子邮件或电话）向我们提供关于您的数据。您提供的数据可能包括有关其他人的数据，这些人是我们服务的实益拥有人。在以下情况中，您需要向我们提供关于您的信息：

- (1) 在注册 WindPayer 账户后；
- (2) 您登录您的 WindPayer 账户时；
- (3) 您通过 WindPayer 账户提交任何指令时；
- (4) 参加促销或调查时；
- (5) 报告问题或收到支持请求时。

您始终可以拒绝提供此类个人数据，但这可能会妨碍您使用我们的服务。

四、信息收集

当您申请 WindPayer 账户时，或者在我们的平台上执行任何交易或使用我们提供的其他服务时，我们会收集您直接提供给我们个人数据。这可能包括：

- (1) 您的联系信息（例如姓名，电子邮件地址，电话号码，帐单或邮寄地址）；

- (2) 银行和信贷帐户信息，包括 PSP 帐户信息，您拥有或与您相关的虚拟银行帐户列表，收款人帐户详细信息（包括转帐号码和银行代码）；
- (3) 公司信息（例如公司名称，公司文件，业务信息或税务信息等）
- (4) IP 地址；
- (5) 身份验证（例如照片，为验证您的信息而要求提供的其他信息，包括有效的身份证明文件或公司文件的副本）；
- (6) 公开的犯罪记录；
- (7) 国家或税务识别号；
- (8) 国籍；
- (9) 出生日期和地点；
- (10) 您的风险评级和风险等级；
- (11) 使用任何服务进行的交易的详细信息，包括付款信息，交易日期，交易 ID，交易类型，目的地银行帐户，目的地客户 ID 和目的地货币；
- (12) 您选择提供给我们的任何其他信息（例如，如果您向我们发送电子邮件或联系我们）；
- (13) 电话或电子邮件或其他信件；
- (14) 通过上面列出的以及下面标题为“Cookies”的部分中所述的 Cookies 和其他追踪技术获得的信息。

您应负责向我们提供准确和最新的信息，否则我们可能无法为您提供任何服务。您还应提供我们认为必要和适当的所有信息，以证明所提供的详细信息真实，准确和完整。

如果要求您提供有关企业股东或实益拥有人的信息，则您在此确认并确信您已获得该人的同意，将其信息提供给我们。这可能包括：

- (1) 联系人信息，例如姓名，家庭住址以及电子邮件地址；
- (2) 电商平台账户信息，例如用户名以及密码；
- (3) 财务信息，例如银行账号，银行对账单以及交易信息；
- (4) 身份验证信息，例如官方政府签发的身份证，护照，国民身份证或驾驶证的图像。根据国籍的不同，信息请求可能会有所不同；
- (5) 居住证明信息，例如水电费账单明细或类似信息。

在提供我们的服务时，我们可能会收集和处理与您的合作方或与您的业务有关的第三方的个人数据。您应负责确保尊重任何第三方（包括您的同行和与您业务相关的其他个人）的隐私权，包括确保适当披露第三方数据的收集和使用；对于这些数据，您在此向我们保证，我们将充当您的数据处理者，并且我们将根据用户协议的条款处理个人数据，并根据您的合法指示行事。

五、个人数据的使用

我们仅会将您的个人数据用于：

- (1) 处理您的交易，包括根据每个国家或地区的当地法律向世界任何国家或地区转入或转出资金；

(2) 根据任何适用法律（其中应包括《反洗钱和反恐怖主义融资条例》（香港法律第 615 章））下的洗钱或恐怖主义融资和了解顾客的要求、我们的内部控制政策，以及任何执法机构的需求执行所需的控制和检查，

(3) 分析我们的网站使用情况，并改善我们的网站和网站产品；

(4) 帮助我们响应您的客户服务要求和支持需求；

(5) 履行我们作为订约方的任何协议下的义务，尤其是与电商平台，其他付款处理方或银行之间的协议；

(6) 验证您在电商平台上注册的帐号；

(7) 将您提供给我们的身份与您提供给电商平台的身份进行比较，以进行身份验证以及检测和减少帐户接管；

(8) 识别您的任何滥用行为；

(9) 识别与您拥有的，电商平台已经识别出滥用行为的账户相关的电商平台账户和虚拟银行账户的集群；

(10) 出于分析，建模，研究，风险管理，补救或预测目的，确定与帐户接管和其他欺诈方式有关的事实模式，尽早或以较高的确定性确定不良行为者的活动，并采取与之相关的行动遵守法律；

(11) 验证您进行的跨境付款的有效性；

(12) 验证您的身份以及您提供的（一个或多个）银行帐户；

(13) 出于评估，分析和风险管理的目的，确定与欺诈和不良行为者模式相关的事实模式；

(14) 识别，预防和减少电商平台中的欺诈，非法或滥用行为或您本人；

(15) 了解我们的服务。您提供的电子邮件地址可能用于传达与您使用我们服务相关的信息和更新。我们也可能传达公司新闻、最新情况以及与我们提供的类似产品和服务相关的信息

(16) 管理不时在我们网站上宣布的竞赛，调查或其他网站功能。

我们不会将您的个人数据用于上述目的以外的任何目的，并且将在不再需要时删除与平台数据有关的适用信息，尤其是与支付和电商平台有关的您的数据。

六、个人数据的披露

我们只会将您的个人数据披露给（a）适用法律或拥有管辖权的法院命令所要求的法律和监管机构；（b）我们的工作人员，第三方服务商和附属组织。就此而言，我们向您保证，此类披露应基于了解所需，并且应征得有关各方的保证，即他们同意对此类数据保密，并将受本隐私政策约束。

（1）披露给第三方

在处理您的交易时，我们可能会与我们的第三方服务商共享您的一些个人数据（基于了解所需）。未经您的同意，您的信息将不会出售，交换或共享给任何第三方，除非提供我们的服务或根据法律或具有管辖权的法院命令的要求。使用我们的服务，即表示您接受本隐私政策的内容，并同意我们根据本隐私政策披露您的个人数据。

我们的第三方服务商在合同上有义务仅出于披露目的保护和使用时类信息，法律另有要求或允许的除外。我们努力确保此类第三方受与本隐私政策，任何适用的监管机构不时发布的所有适用法律，规则，指南和指示相同的保护性条款约束。

我们可能需要将您或您的市场所提供的某些交易数据披露给我们在中国的合作方，以确保可以在满足中华人民共和国法律的所有法律要求下将资金汇入您在中国的指定帐户。

(2) 披露给法律机关

在以下情况下，我们可能会与执法机构和其他政府或监管机构共享您的个人数据：

- (a) 我们受到传票，法院命令或其他法律程序的施压；
- (b) 我们有合理的理由认为，为防止人身伤害或经济损失，有必要进行披露；
- (c) 有必要披露以举报可疑的非法活动；
- (d) 有必要披露以调查违反本隐私政策或我们用户协议的情况。

七、数据的转移和储存

我们的服务本质上是全球性的，数据可以在我们开展业务或与第三方服务商合作的任何国家或地区进行存储和处理。这意味着数据可能会在香港境外传输和存储。我们收集的数据可能会转移到存储在香港以外的目的地，该目的地可能具有与香港不同的数据保护规则，包括代表我们或为了我们的供应商与监管机构或处理数据的香港以外地区工作人员之间的数据转移。工作人员可能会满足您的要求并提供支持服务。但是，我们将采取措施确保任何此类转移均符合香港法律，并确保您的数据受到本隐私政策中所述标准的保护。向我们提交您的个人数据，即表示您同意我们按照本隐私政策进行传输，存储或处理。我们将采取合理必要的步骤，以确保根据本隐私政策和适用法律对数据进行安全处理。

八、个人数据的保护

WindPayer 会采取适当措施，防止未经授权的访问，使用，更改或破坏个人识别信息，包括电脑保护和档案等。WindPayer 不会向任何人出售您的个人识别信息。为提供服务之目的，及为满足反洗钱和反恐怖主义融资和其它法律要求，我们可以将您的个人识别信息向我们的关联公司和第三方服务商披露。部分关联公司和第三方服务商可能不在您所在的国家。我们也可能将您的信息提供给政府部门，合规部门，执法部门，法院等，以满足相关法律要求，防止刑事犯罪、或其他合法目的。您使用我们的服务，即代表同意我们将您的个人识别信息披露给前述主体。WindPayer 可能通过您的个人联系信息与您联系，就账户问题，修订，提升，以及服务促销等与您沟通。如果我们致电您，为确保安全和培训目的，我们的通话可能会被录音。

九、Cookies

Cookie 是信息数据，网站在您访问该网站时会保存在您的计算机或移动设备上，您再次访问网站时，浏览器会发送给网站。WindPayer 通过 Cookies 能识别、追踪访客，能使网站能够在一段时间内记住您的操作和偏好。如果您不希望您在您电脑上植入 Cookies，请您在适用我们的 WindPayer 网站前，先在您的浏览器上进行设置，拒绝 Cookies 植入。

您可以选择接受或拒绝 Cookie。如果您拒绝 Cookie，则可能无法使用我们网站的某些功能并无法访问我们网站上的某些在线服务。

十、本隐私政策的修订

WindPayer 有权随时变更本隐私政策。我们希望您能定时访问本页面，以查看相关变更。如您在隐私政策变更后仍然继续使用我们网站的，视为同意了相应变更。

十一、责任声明

在任何情况下（包括贵方以其他方式向我方提供的任何同意书），我们都不对您承担任何因使用或披露或传播用户数据而引起的索赔、损失、损害、费用（包括合理的法律费用）。

十二、适用法律

本隐私政策受香港法律管辖并根据其进行解释。

Privacy Policy for WindPayer Technology Limited

WindPayer Technology Limited (“WindPayer”, or “we” or “our” or “us”, which shall include its holding companies, subsidiaries, directors, investors, employees, etc.) understand the importance of privacy and work hard to keep your personal data confidential. This Privacy Policy, together with our Terms and Conditions of Use, governs our collection, processing and use of your personal data. In this Privacy Policy, "personal data" refers to information that may identify an individual, such as name, address, e-mail address, trading information, and banking details but does not include anonymized and/or aggregated data that does not identify a specific user.

This Privacy Policy is written in English and translated into Chinese. In case of any discrepancy between the Chinese and English versions, the English version shall prevail.

By entering our Terms and Conditions of Use, you agree to be bound by this Privacy Policy and any amendments thereto and agree to the collection, processing and communication of your data as described in this Privacy Policy. If there is any conflict or discrepancy between this Privacy Policy and the Terms and Conditions of Use, the Terms and Conditions of Use prevails.

Introduction

In order to be able to make our services available to you in compliance with the obligations imposed by any applicable law and by rules, guidelines and directives from time to time issued by regulatory authorities, we must ask you for certain information about yourself, including identification documents, financial information (e.g., information about your identity, e-commerce sales, beneficiary account, etc.) and other information/documents as from time to time required by the applicable laws and rules, guidelines and directives. We will utilize the data provided by you in accordance with applicable provisions of governing data protection laws, which shall include, without limitation, the Personal Data (Privacy) Ordinance (Cap.486 of the laws of Hong Kong). The information obtained shall, as a matter of principle, be used by us solely for providing our services and solely to the extent necessary to render such services. The information about you which we possess shall, as a matter of principle, not be made accessible to third parties unless we are under any legal obligation to do so or under any court order with competent jurisdiction, or we must do so to render our services to you (such as rendering your personal data to our counterparts in any part of the world, the online marketplaces for verification of your data and for investigation purposes, or the banks for processing the funds). In other

cases, we will obtain your consent before we disclose any of your personal data to any third party.

Your privacy is of utmost importance to us. At WindPayer, we uphold the following fundamental principles:

- We don't ask you for personal information unless we truly need it.
- We don't share your personal information with anyone except to comply with the law, provide our services, or protect our rights.
- We restrict access to your personal information Affiliates and Service Providers who need the information to provide services to you or to comply with applicable anti-money laundering, counter terrorist financing, and/or other laws and regulations.
- We maintain physical, electronic and process security protocols to protect your personal information.

Please carefully review this Privacy Policy prior to registering for a WindPayer Account and providing us with your personal information. If you have any questions about how your data is protected, please don't hesitate to contact WindPayer Customer Support. You may also consult your own legal representative who will be able to give you the best advice before entering into any relationship with us.

For the purpose of this Privacy Policy, if you have registered for a WindPayer Account or otherwise use WindPayer's services, the term "WindPayer", "we", "ours", "WindPayer Account", and "Service Provider" are as defined in our Terms and Conditions of Use.

Website Visitors

Like most website operators, WindPayer collects non-personally-identifying information of the sort that web browsers and servers typically make available, such as the browser type, language preference, referring site, and the date and time of each visitor request. WindPayer's purpose in collecting non-personally identifying information is to better understand how WindPayer's visitors use its website. From time to time, WindPayer may release non-personally-identifying information in the aggregate, e.g., by publishing a report on trends in the usage of its website. WindPayer also collects potentially personally identifying information like Internet Protocol (IP) addresses for logged in users. WindPayer only discloses logged in user IP addresses under the same circumstances that it uses and discloses personally identifying information as described below.

You may provide us data about you by filling in forms on our website (e.g. WindPayer Account Registration Form), or by corresponding with us (for example, by e-mail or telephone). The data you provide may include data about

additional persons that are beneficial owners of our services. This includes that is provided to us about you:

- (1) upon registration for a WindPayer Account;
- (2) when you log in to your WindPayer Account;
- (3) when you submit any instruction through your WindPayer Account;
- (4) when entering a competition, promotion or survey; and
- (5) when a problem is reported or a request for support is received.

You can always refuse to supply such personal data, but it may prevent you from being able to use our services.

Collection of information

We collect the personal data you provide directly to us when you apply for a WindPayer Account, perform any transactions on our platform, or use other services provided by us. This may include:

- (1) your contact information (e.g., name, email address, phone number, billing or mailing address);
- (2) bank and credit account information, including PSP account information, list of virtual bank accounts owned by or related to you, beneficiary account details (including routing number and bank code);
- (3) corporate information (e.g. company name, corporate documents, business information or tax information etc);
- (4) IP address;
- (5) identity validation (e.g., photograph, other information requested to verify your information, including copy of valid ID document or corporate documents);
- (6) publicly available and/or criminal history;
- (7) national or tax identification numbers;
- (8) nationality;
- (9) date and place of birth;
- (10) risk rating and risk level of you;
- (11) details of any transactions carried out using any the services which shall include the disbursement information, transaction date, transaction ID, transaction type, destination bank account, destination customer ID and destination currency;
- (12) any other information that you choose to provide to us (e.g., if you send us an email/otherwise contact us);
- (13) calls/emails/other correspondence; and
- (14) information through Cookies and other tracking technologies as listed above and as described in the section below entitled “Cookies”.

You shall be responsible for providing accurate and up-to-date information to us or we may not be able to provide any service to you. You shall also provide all information that we consider necessary and appropriate to prove that the details provided are true, accurate and complete.

If you are required to provide information about shareholders or beneficial owners of your business, you hereby acknowledge and confirm that you have that person's consent to provide his/her information to us. This may include:

- (1) contact information, such as name, home address, and email address;
- (2) online marketplace account information, such as username and password;
- (3) financial information, such as bank account numbers, bank statement, and trading information;
- (4) identity verification information, such as images of your government issued ID, passport, national ID card, or driving license. Depending on nationality, the information request may be different; and
- (5) residence verification information, such as Utility bill details or similar information.

We may collect and process Personal Data about your counterparties or third parties related to your business in providing our services. You shall be responsible to make sure that the privacy rights of any third parties, including your counterparties and other individuals related to your business, are respected, including ensuring appropriate disclosures about third party data collection and use; with respect to such data you hereby undertake with us that we are acting as your data processor, and we will process personal data in accordance with the terms of the Terms and Conditions of Use and act in accordance with your lawful instructions.

Use of personal data

We will only use your personal data to:

- (1) process your transactions, including transfers into and out of any country in the World in accordance with the local laws of each such country;
- (2) perform the required controls and checks in accordance with money laundering/terrorist financing and know your customer requirements under any applicable law (which shall include the Anti-Money Laundering and Counter Terrorist Financing Ordinance (Cap.615 of the laws of Hong Kong), our internal control policies, and also the needs of any law enforcement agencies;
- (3) analyze our website usage, and improve our website and website offerings;
- (4) help us respond to your customer service requests and support needs;
- (5) fulfill our obligations under any agreement to which we are a party, in particular, the agreements with online marketplaces, other payment processors or banks;
- (6) verify the account numbers you have registered with the online marketplaces;
- (7) compare the identities that you have provided to us to your identities provided to the online marketplaces for the purpose of identity verification and detecting and mitigating account takeovers;
- (8) identify any abusive behaviour of you;

(9) identify clusters of online marketplace accounts and virtual bank accounts related to those owned by you that online marketplace has identified abusive behaviour;

(10) for analytical, modelling, research, risk management, remediation or forecasting purposes, identify fact patterns associated with account takeovers and other fraud modus operandi, and identify bad actor activities earlier or with a greater degree of certainty and to take actions in connection therewith in compliance with the laws;

(11) verify the validity of cross border disbursements done by you;

(12) verify the identity of you and the bank account(s) provided by you;

(13) for measurement, analytics and risk management purposes, identify fact patterns associated with fraud and bad actor patterns;

(14) identify, prevent and mitigate fraudulent, illegal or abusive behaviour or you in online marketplaces;

(15) contact you about our services. The email address you provide may be used to communicate information and updates related to your use of our services. We may also occasionally communicate company news, updates, and related information relating to similar products and services provided by us; and

(16) administer contests, surveys or other site features as will from time to time be announced on our website.

We will not use your personal data for any purpose other than the purpose specified above and will delete the applicable information regarding marketplace data after it is no longer required, in particular your data relating to disbursement and to online marketplaces.

Disclosure of Personal Data

We only disclose your personal data (a) to legal and regulatory authorities as required by applicable law or court order with competent jurisdiction; and (b) to our employees, service providers and affiliated organizations. To this extent, we assure you that such disclosure shall be on a need-to-know basis, and an undertaking from such parties that they agree to keep such data confidential and will be subject to this Privacy Policy.

(1) Disclosure to Third Parties

In processing your transactions, we may share some of your personal data (on a need-to-know basis) with our service providers. Your information will not be sold, exchanged, or shared with any third parties without your consent, except to provide our services or as required by law or court order with competent jurisdiction. By using our services, you accept the contents of this Privacy Policy and agree to our disclosure of your personal data in accordance with this Privacy Policy.

Our service providers are contractually bound to protect and use such information only for the purposes for which it was disclosed, except as otherwise required or permitted by law. We strive to ensure that such third parties will be bound by terms no less protective than those described in this Privacy Policy, all applicable laws and rules, guidelines and directives from time to time issued by any regulatory authority.

We may need to disclose certain transaction data provided by you or your marketplace to our counterparts in China to ensure that the funds can be remitted to your designated account in China in fulfillment of all legal requirements under the laws of the People's Republic of China.

(2) Disclosure to Legal Authorities

We may share your personal data with law enforcement agencies and other governmental or regulatory bodies when:

- (a) we are compelled by subpoena, court order, or other legal procedure; or
- (b) we have a reasonable ground to believe that the disclosure is necessary to prevent physical harm or financial loss; or
- (c) disclosure is necessary to report suspected illegal activity; or
- (d) disclosure is necessary to investigate violations of this Privacy Policy or our Terms and Conditions of Use.

Transfer and storage of data

Our services are global in nature and data may be stored and processed in any country where we have operations or where we engage service providers. That means data may be transferred and stored outside the boundary of Hong Kong. Data we collect may be transferred to and/or stored at a destination outside Hong Kong, which may have data protection rules that are different from Hong Kong, including transferring data to and from regulatory authorities, or to staff operating outside Hong Kong who process data on our behalf or for our suppliers. Staff may be engaged in the fulfilment of your request and the provision of support services. However, we will take measures to ensure that any such transfers comply with the laws of Hong Kong and that your data remains protected to the standards described in this Privacy Policy. By submitting your personal data to us, you agree to our transfer, storing or processing in accordance with this Privacy Policy. We will take steps reasonably necessary to ensure that the data is treated securely and in accordance with this Privacy Policy and the applicable laws.

Protection of Certain Personal Data

WindPayer takes all measures reasonably necessary to protect against the unauthorized access, use, alteration or destruction of personally identifying

information. These measures include computer safeguards and secured files. WindPayer will not rent or sell personally identifying information to anyone. WindPayer may disclose personally-identifying information to its Affiliates and Service Providers for the purpose of providing services to WindPayer or complying with applicable anti-money laundering, counter terrorist financing, and/or other legal requirements. Some of these Affiliates and Service Providers may be located outside of your home country. We may also need to provide your information to government authorities, regulatory bodies, police/law enforcement agencies, or a court of law. This would be done, for example, to meet legal requirements, to aid in the prevention of a crime, or for other lawful purposes. By using our services, you consent to the disclosure of your personally-identifying information to the aforementioned persons or entities. WindPayer may use your personal contact information to reach out to you regarding any account correspondences and any changes, improvements, or promotions related to our services. In the event that we correspond with you via phone, please note that we may record our telephone calls with customers for security and training purposes.

Cookies

A cookie is a string of information that a website stores on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns. WindPayer uses cookies to help WindPayer identify and track visitors, their usage of WindPayer website, and their website access preferences. WindPayer visitors who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using WindPayer's websites.

You may choose to accept or reject cookies. If you reject the cookies, you may not be able to use some of the functions of our website and accessing some online services on our website.

Amendments to this Privacy Policy

From time to time, WindPayer may, at its sole discretion, change its Privacy Policy. WindPayer encourages you to frequently check this page for any changes to its Privacy Policy. Your continued use of this site after any change in this Privacy Policy will constitute your acceptance of such change.

Liability

We shall in no event be liable to you in respect of any claims, losses, damages, expenses (including reasonable legal fees) arising out of or in connection with the use and/or disclosure or dissemination of the user data in accordance with this Privacy Policy and any consents that you may have otherwise provided to us.

Governing Law

This Privacy Policy shall be governed by and construed in accordance with Hong Kong law.