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鷹君集團有限公司
Great Eagle
Holdings Limited

PRIVACY POLICY

1. Introduction

- 1.1 This Privacy Policy describes how Great Eagle Holdings Limited (“Great Eagle” or the “Company”) and its subsidiaries (collectively, “Great Eagle Group”, “we”, “us” or “our”) collect, use, retain, disclose, protect and process information you provide on our websites or social media platforms, our mobile applications, and through the services available on these platforms managed and operated by us or our affiliates. It also applies when you are entering into a contractual or investment relationship with us or our affiliates in respect of any products or services provided by us. It covers personal data shared by you through our products or services. We are committed to ensuring that all personal data is handled in accordance with applicable data protection laws, including the Hong Kong Personal Data (Privacy) Ordinance, the United Kingdom General Data Protection Regulation (“UK GDPR”), the General Data Protection Regulation of the European Union (“GDPR”) and the Personal Information Protection Law (“PIPL”) of the People’s Republic of China.
- 1.2 This Policy applies to all products and services provided by us. It serves also as the guidelines to be observed by all business divisions operated and/or managed by the Great Eagle Group and its affiliates. For the avoidance of doubt, our business divisions and affiliates may have their own privacy policy, and you should also refer to their specific privacy policy.

2. Subsidiary Boards

- 2.1 Subsidiary boards of the Great Eagle Group remain responsible for establishing their own privacy policy, where appropriate. The principles and procedures applied by subsidiaries and business divisions of the Great Eagle Group should support the effectiveness of this Policy.
- 2.2 Subsidiary management and boards should have appropriate input to their local or regional application and to the assessment of local risk areas.
- 2.3 While the strategic objectives, risk governance framework, corporate values and corporate governance principles of the subsidiary should align with that of the Company (referred to here as “group policies”), the subsidiary boards should make necessary adjustments where a group policy conflicts with an applicable legal or regulatory provision or prudential rule, or would be detrimental to the sound and prudent management of the subsidiary.
- 2.4 It is the responsibility of subsidiary boards to assess the compatibility of group policies with local legal and regulatory requirements and, where appropriate, amend those policies.

- 2.5 Where, because of local laws or regulations in any relevant overseas jurisdiction, an overseas subsidiary is unable substantively to reflect the principles and procedures set out in this Policy in its system, the Company should be informed.

3. Observing Local Laws When Working in Another Jurisdiction

- 3.1 Any employee who conducts business on behalf of the Group in another jurisdiction must also abide by the laws of that jurisdiction, including laws and regulations on data privacy, and all other laws and regulations pertaining to ethical business conduct.

4. Our Commitment to Protect Your Privacy

- 4.1 We are committed to safeguard your personal data and privacy. To ensure that you can make informed decisions and feel confident about sharing certain personal information with us, please read this Privacy Policy to understand whom we share your personal data with and for what purpose, and the choices you have concerning how your personal data are collected and used by us. By providing personal information to us, you agree and consent to the collection, use, disclosure, transfer and retention of your personal data as outlined in this Privacy Policy.
- 4.2 This Privacy Policy will be continuously assessed against new technologies, business practices, compliance requirements and your needs. As we update and diversify our products, services and businesses, this Privacy Policy may be updated from time to time. We reserve the right, at our discretion, to change, modify, add or remove any parts from this Privacy Policy at any time without any prior notice. You are encouraged to review this Privacy Policy from time to time for updates periodically. Your continued use of the products or services after such updates are posted means you elect to accept these updates.
- 4.3 Certain personal data are required for specific services and if you fail to supply such personal data as requested from each specific service, we may be unable to provide you the services in full or at all.
- 4.4 If you are under the age of consent as defined by the laws of your jurisdiction, consent from your parent or guardian is required before you provide us with any personal data.
- 4.5 If you resided in or are in Mainland China and use our products or services, we will process and maintain your personal data as outlined in the Addendum for Mainland China of this Privacy Policy.

5. Collection of Personal Data

- 5.1 ***Information you voluntarily provide to us when you sign up for and use our products or services*** - We may collect personal data from you in connection with our services and products. This includes information provided by you as an investor, visitor to our website, or in any other capacity. Personal data refers to any information that can identify you as an individual. The provision of personal data to us is on a voluntary basis. If you fail to provide sufficient information, we may not be able to provide relevant products or services. If you provide us with information about other individuals, you should ensure that you have already obtained all required authorisation from those individuals and ensure that they have read, understand and agree to this Privacy Policy. We collect personal data (including where applicable sensitive personal data) you provide directly to us. By virtue

of your provision of personal data, you consent to such personal data being collected, used, disclosed, transferred, and retained by us as described in this Privacy Policy. Subject to circumstances, this type of information may include:

- 5.1.1 your personal information such as your first name/last name, title, contact details (e.g. mobile phone number, physical address and e-mail address), gender, occupation, location, job title, billing information, purchase history and other demographic information;
- 5.1.2 username and password that you will use to access to our products or services;
- 5.1.3 a record of any interactions and correspondence between us such as email, telephone, mobile short messaging service (SMS), multimedia messaging services (MMS), cross-platform mobile messaging application (e.g. smartphone messaging application) or postal correspondence, any interactions you have with our staff or representatives and any interactions with us or posts that refer to us on social media;
- 5.1.4 information that we collect about your interests, preferences and opinions;
- 5.1.5 your feedback, opinions about our products or services and your responses to market surveys and contests conducted by us;
- 5.1.6 information collected through the use of closed circuit television systems and other security systems;
- 5.1.7 any other personal data you choose to provide to us; and
- 5.1.8 for investor or shareholder of any of the listed platforms^{Note(1)} controlled or managed by us, your full name, postal address, email address, telephone number, percentage of share and vote, other personal data strictly in connection with the investment and, if appropriate, copy of your identification document, either directly from you or from the share registrars and transfer offices of these listed platforms.

Note (1) They include Great Eagle Holdings Limited (Hong Kong Stock Exchange (“HKEx”) Stock Code: 41), Champion Real Estate Investment Trust (HKEx Stock Code: 2778) or Langham Hospitality Investment and Langham Hospitality Investments Limited (HKEx Stock Code: 1270).

- 5.2 **Information we collect automatically when you use our products or services** - When you access or use our products or services, we automatically collect information about your visit to our websites and online platforms, your usage of our products or services and your web browsing activities. That information may include your IP address, your operating system, your browser ID, your browsing activity, and other information about how you interacted with our websites and online platforms and other websites. We may collect this information as a part of log files as well as through the use of cookies or other tracking technologies. Cookies used in any part of our websites and online platforms will not be deployed for collecting personal data. For your information, Cookies are small computer files that can be stored in web surfers’ computers for the purposes of obtaining configuration information and analysing web surfers' viewing habits. They can save you

from registering again when re-visiting a website and are commonly used to track your preferences in relation to the subject matter of the website. You may refuse to accept Cookies by modifying the relevant internet options or browsing preference of your computer system, but to do so you may not be able to utilise or activate certain available functions in our websites. Subject to the Cookies Policy of the websites, our websites may bar users who do not accept Cookies. Please refer to the Cookies Policy of the respective websites for details.

- 5.3 ***Information from your use of our products or services*** – We may receive information about how and when you use our products or services, store it in log files or other types of files associated with your account, and link it to other information we collect about you. This information may include, for example, your IP address, time, date, browser used, and actions you have taken within the application. This type of information helps us to improve our products or services.
- 5.4 ***Information from other sources*** – We may, from time to time, collect other personal data from third parties including: (a) our service providers and agents; (b) the third parties that we partner with in connection with us; (c) our third party joint marketing and research partners; (d) providers of third party websites, apps and social media platforms; and (e) public databases. Examples of the information we may receive from other sources include demographic information, company information, device information, location, and online behavioural data. We use this information, alone or in combination with other information (including personal information) we collect, to enhance our ability to provide relevant marketing and content to you and to develop and provide you with more relevant products features, and services.

6. Purposes for Collection and Use of Personal Data

- 6.1 Our primary purpose in collecting personal data from you is to give you an enjoyable customised experience. Specifically, we may use data for the following purposes:
- 6.1.1 to administer and provide our products or services to you (including identity verification, system security and maintenance, billing and payment) and to fulfil our obligations to you;
 - 6.1.2 to tailor and personalise services which may be of interest to you;
 - 6.1.3 to provide customer support and to improve the efficiency and quality of our products or services;
 - 6.1.4 to communicate with you and respond to your inquiries;
 - 6.1.5 to comply with legal and regulatory requirements;
 - 6.1.6 for marketing and promotion purpose, subject to your rights to opt-in and opt-out of receiving certain marketing communications. For example, membership clubs, loyal and reward programmes and redemption of shopping/dinning privileges or offers of us or our affiliates. For more details on marketing, please see Section 8 below;

- 6.1.7 for internal record keeping of information of our tenants, customers, employees, consultants, contractors, investors, shareholders, other service providers, business transactions and communications;
 - 6.1.8 to enable us to contact and interact with you whether online or otherwise in connection with our products or services or marketing campaigns, promotion programmes or other offerings;
 - 6.1.9 for improvement of customer services and staff training;
 - 6.1.10 for designing new and/or enhancing our existing services, products and activities;
 - 6.1.11 for managing and providing for the safety and security of our guests, customers, visitors, employees or users;
 - 6.1.12 to protect or comply with our legal rights and obligations and to prevent, detect and investigate wrongdoing or crime and analyse and manage any risks or irregularities; and
 - 6.1.13 for any other purposes incidental to the above and for any other purpose to which you may from time to time agree.
- 6.2 To fulfil the above purposes, you may be contacted via email, telephone, mobile short messaging service (SMS), multimedia messaging services (MMS), cross-platform mobile messaging application (e.g. smartphone messaging application), mail or other means that are allowed by local authorities.
- 6.3 We may also, from time to time use aggregate non-identifying information about our customers to better design our websites and online platforms and/or to improve our products or services. This means we may provide this information to third parties. This type of data may include, but is not limited to, the browser type and version, operating system, IP address and/or domain name. However, this information will never identify any single member of the programme in particular.

7. Who We Share Your Personal Data with

- 7.1 We may disclose and transfer personal data to and use personal data with our affiliates, service providers, and other persons who we consider appropriate, in connection with our services and products provided to or requested by you. We may disclose this information to facilitate communication of news and information about such services and products and otherwise for the purposes mentioned under Section 6 above.
- 7.2 The entities with whom we may share your personal data include but are not limited to any affiliates, agent, contractor or third party service provider who provides administrative, marketing and research, data processing, telecommunications, computer or other services to us and/or our affiliates.
- 7.3 We may disclose your personal data to third parties so they can provide marketing services or conduct marketing or social interaction activities on our behalf such as campaigns, contests, sweepstakes, market research, customer surveys and data analytics to help us improve and tailor our marketing activities, products and services. Subject to obtaining

appropriate consent from you, we may also disclose your personal data to our third party marketing partners in order that they may market their products and services to you.

- 7.4 We may disclose your personal data to governments and regulatory authorities and bodies and to other individuals, bodies and organisations such as dispute resolution, prosecution and law enforcement agencies, regulatory bodies and/or legal advisers for compliance with applicable laws, rules, regulations, codes, and/or guidelines and/or any person or entity to whom we are under a binding obligation to make disclosure under the requirements of any law, rule, regulation, code and/or guideline and/or order of any competent court of law, law enforcement agencies and/or regulatory bodies, but such disclosure will only be made under proper authority or when we believe in good faith that such disclosure is necessary to comply with legal requirements
- 7.5 We will permit our third party service providers, including agents, contractors and our affiliates, to use your personal data on our behalf for the purposes set out in Section 6 above. Example of such third parties include our contractors under a duty of confidentiality to us who provide administrative, telecommunications, computer, data processing or other services to us in connection with management, operation and maintenance of the system and our data center in or outside Hong Kong.
- 7.6 We may also disclose or transfer any information we have about you that may be considered as an “asset” in connection with a merger or sale (including transfers made as part of insolvency or bankruptcy proceedings) involving all or any part of Great Eagle Group or as part of a corporate reorganisation or stock sale or other change in corporate control.
- 7.7 We may disclose your personal data to third parties in the following circumstances:
 - 7.7.1 where disclosure is legally permissible and necessary to protect our rights or the rights of others;
 - 7.7.2 in connection with a reorganization, restructuring, merger, acquisition, or transfer of assets; and
 - 7.7.3 to our service providers who assist us with the provision of our services.
- 7.8 For the avoidance of doubt, the specific kind of information we disclose or transfer to third parties as set out above will depend on your activities with us and only to the extent as required or permitted by law, and/or with your consent (where applicable).

8. Marketing and Communications

- 8.1 We may use your personal data for marketing and promotional purposes, including (a) for sending or showing you updates on latest news, offers and promotions in connection with our products and services; (b) for sending or showing you joint marketing offers, events and promotions; or (c) for tailoring and tracking your interactions with internet banner advertisement and links from third party websites to our websites and online platforms.
- 8.2 We may also use personal data to analyse our customers’ preferences and market trends and derive insights, which we may use to tailor the types of products, offers and services that we present to you. This may involve us combining personal data that we hold about

your use of our services with information that we have collected about your web usage. We may also combine information that we have collected about you with information that we have collected about other customers in order to derive these insights and establish market trends. We may provide these insights to our third party partners for their marketing and promotional purposes. We also use advertising services and products provided by third party service providers (such as marketing agencies and social media platforms) for marketing and promotional purposes, which may involve us sharing personal data that we hold about you with them.

- 8.3 We may communicate marketing and promotions to you by email, telephone, mobile short messaging service (SMS), multimedia messaging services (MMS), cross-platform mobile messaging application (e.g. smartphone messaging application), mobile application or online (including via internet banner advertisement and links) and, as appropriate and where required, we will ask you for your consent, or otherwise provide you with the opportunity to choose not to receive marketing, at the time we collect your data.
- 8.4 We may request your consent as required by applicable laws and regulations. We will provide an option to unsubscribe or opt out of further communication on any direct marketing communication sent to you. You may also opt out by contacting us as set out in Section 10 below.
- 8.5 Please note that if you choose to unsubscribe or opt out of marketing communication, we will still send you communications about the products or services we provide to you.

9. Transmission, Storage and Security of Your Personal Data

- 9.1 *Security* - No data transmission over the Internet, a website, mobile application or via email or other message service or by mail can be guaranteed to be secure from intrusion. However, we maintain commercially reasonable physical, electronic and procedural safeguards to protect your personal data in accordance with the requirements of data protection legislation. All personal data we collect about you is stored on our or our subcontractors' secure servers. We comply with our security policies and standards when accessing or using this information and restrict access to your personal data to those persons who need to use it for the purpose(s) for which it was collected. You are responsible for keeping any information that we send to you confidential and for complying with any other security procedures that we notify you.
- 9.2 *Exporting your personal data* - Your personal data may be transferred outside the country in which you are located as we deem necessary and appropriate for providing products or services to you or other purpose as described under this Privacy Policy, including to countries with a lower level of data protection than in the country in which you are located. When required, we export your personal data in accordance with applicable laws relating to such export and we will take appropriate measures to ensure your personal data is exported and processed as described in this Privacy Policy.
- 9.3 *Retention period* - To the extent permissible by applicable law, we generally only keep your information for as long as reasonably required for (a) the purposes for which that personal data was provided; (b) ongoing business need, including record keeping, fraud prevention, or if we reasonably believe there is a prospect of litigation; and (c) as necessary to meet legal, regulatory, tax or accounting needs. We take reasonable steps to

safely and securely delete, dispose of, anonymise and/or block personal data when we no longer need it.

10. Your Rights and Contacting Us

- 10.1 *General rights* - You have the right (subject to various exceptions and in accordance with data protection legislation in your country) to access certain personal data held about you and correct any inaccuracies by contacting our Data Protection Officer. We may charge a reasonable fee for the processing of any data access request. You also have the right to raise a complaint about our processing by contacting our Data Protection Officer.
- 10.2 *Right to opt out of direct marketing* - You have the right to ask us not to process your personal data for direct marketing purposes. You can exercise your right to prevent such processing by indicating that you do not consent to direct marketing at the point at which we collect your personal data. You can also exercise the right at any time after we have collected and used your personal data for direct marketing purposes by (a) following the opt-out instructions contained in the relevant communications; or (b) contacting our Data Protection Officer.
- 10.3 *Right to refuse us to transfer or disclose your personal data to our contractors* - You can exercise your right to refuse us to transfer or disclose your personal data to our contractors by contacting our Data Protection Officer at any time. Your personal data will be either irreversibly anonymised (and the anonymised information will be retained) or securely destroyed.
- 10.4 *Updating personal data* - We will take reasonable steps to try to ensure that your personal data is accurate. You can update your personal data at any time by (a) mobile applications; or (b) contacting our Data Protection Officer.
- 10.5 *Contacting Data Protection Officer* - You have the right to send your request to our Data Protection Officer at any time with any of the following methods to fulfil the above purposes set out in this section:
- 10.5.1 By email (please send your registered username (if applicable), name, email and mobile number to dataprotectionofficer@greateagle.com.hk); or
- 10.5.2 By post (please send your registered username (if applicable), name, email and mobile number to Data Protection Officer, 33rd Floor, Great Eagle Centre, 23 Harbour Road, Wanchai, Hong Kong).
- 10.6 The English version of this Privacy Policy shall prevail wherever there is any inconsistency or conflict between the English and Chinese version.

Version 2.0 - January 2025

PRIVACY POLICY

GDPR Addendum

This GDPR Addendum applies in circumstances where the privacy practices of Great Eagle Holdings Limited (“Great Eagle”) and its subsidiaries (collectively, “Great Eagle Group”, “we”, “us” or “our”) are subject to the General Data Protection Regulation of the European Union (“GDPR”). This will be the case if you are located in the European Economic Area during your interactions with us where your personal data is processed by us.

This GDPR Addendum supplements to and should be read in conjunction with the Privacy Policy of Great Eagle, and if applicable, specific privacy policy for our business divisions. In this GDPR Addendum, we set out further information on our processing activities and details of the rights which you have under the GDPR. We reserve the right, at our discretion, to change, modify, add, or remove any parts from this GDPR Addendum at any time. You are encouraged to review this GDPR Addendum from time to time for updates periodically. Your continued use of our products or services after such updates are posted means accepted these updates.

1. Why We Collect Your Data the Legal Grounds for Processing

- 1.1 We collect personally identifiable information about you as more particularly described in the Section 5 headed “Collection of Personal Data” of the Privacy Policy and the purposes for collection and use of these personal data are described in the Section 6 headed “Purposes for Collection and Use of Personal Data” of the Privacy Policy.
- 1.2 Personal data will only be processed where we have lawful bases for doing so. The lawful bases depend on the purpose of the processing, as outlined below:
 - 1.2.1 *Consent* – where you have given consent to the processing of your personal data for one or more specific purpose. You may withdraw your consent to the use of your personal data by contacting us as set out in paragraph 10.5 of the Privacy Policy.
 - 1.2.2 *Contract performance* – where processing is necessary and serves the legitimate interests for the performance of a contract and the provision of services to which you are a party or in order to take steps at your request subject prior to entering into a contract.
 - 1.2.3 *Legal obligation* – where we need to use your personal data to comply with our legal obligations.

- 1.2.4 *Vital interests* - where we need to process your personal data in order to protect the vital interests of you or another natural person, e.g. where you require urgent assistance.
 - 1.2.5 *Public interest* - where processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us.
 - 1.2.6 *Legitimate interests* - where we have a legitimate interest in using your information. We will only rely on this legal ground if we consider that our interest in using your personal data for the relevant purpose is not outweighed by any interests that you may have, or any prejudice that you may suffer, from the relevant use of your personal data.
- 1.3 We collect and handle sensitive personal data which may be necessary to perform reasonably expected services or as required by law, for example, we may handle requests for special requirements relating to personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs and data concerning health. Where we process this category of data, this will be done only in compliance with applicable laws, for example as permitted on any or more of the following basis:
- 1.3.1 *Consent* – where you have given consent to the processing of your personal data for one or more specific purpose. By providing us with this information, you expressly consent to our use of your sensitive person information in accordance with this Privacy Policy. You may withdraw your consent to the use of your personal data by contacting us as set out in paragraph 10.5 of the Privacy Policy.
 - 1.3.2 *Vital interest* - where we need to process your personal data in order to protect the vital interests of you or another natural person where you or the other person is physically or legally incapable of giving consent.
 - 1.3.3 *Legal claims* - where your personal data is necessary for us to establish, exercise or defend any legal claims.
 - 1.3.4 *Substantial public interest* - where we need to process your personal data for reasons of substantial public interest set out in EU law or the laws of the member state in which you are based.
 - 1.3.5 *Public interest in area of public health* - where we need to process your personal data for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health, set out in EU law or the laws of the member state in which you are based.

2. Children's Data

- 2.1 We request that children not provide personal data through the services. In the event any personal data of minors under the age of 16 were collected, we will delete the data when any individual contacts us in accordance with paragraph 10.5 of the Privacy Policy.

- 2.2 Individuals under the age of 18 must obtain the consent of an individual who holds parental responsibility for them prior to providing us with their personal data. If you are an individual who holds responsibility of a minor under the age of 18, you should carefully read this GRPR Addendum and the Privacy Policy before helping the minor to complete registration or use of our websites or online platforms.

3. International Transfer

- 3.1 Services on the internet are accessible globally so collection and transmission of person data is not always limited to one country. We may, subject to applicable law, transfer your personal information we collect about you and your personal information may be stored and processed, in countries other than the country in which the information was originally collected where data protection laws in these countries may differ from the laws applicable to the country in which you initially provided the information. If and to the extent that we do so, we will ensure that appropriate measures are in place to comply with our obligations under applicable law governing such transfers, including, but not limited to, making such transfers in accordance with the European Commission approved Standard Contractual Clauses. However, our collection, storage and use of your personal data will at all times continue to be governed by the Privacy Policy.
- 3.2 By providing any personal information to us, you fully understand and unambiguously consent to the transfer and processing of such personal information. If you object to your personal information being transferred or used in this manner, please consider carefully before registering with or using our websites and online platforms.

4. Retention Periods

- 4.1 We only retain the personal data collected from you for as long as we need it to fulfil the purposes for which it was collected and/or for which you have given your consent to, or otherwise as required by applicable laws and regulations. We will retain and use information as necessary to comply with our legal obligations, resolve disputes and enforce our agreements but will not be kept for longer than necessary.

5. Your Rights Under the GDPR and Contacting Us

- 5.1 In addition to the rights described, under the GDPR, the following rights may be available to you in relation to your personal data, which apply in certain circumstances and subject to certain restriction:
- 5.1.1 the right to access your personal data;
 - 5.1.2 the right to request the rectification and correction of your personal data;
 - 5.1.3 the right to request the erasure of your personal data (right to be forgotten);
 - 5.1.4 the right to restrict our use of your personal data;
 - 5.1.5 the right to object to the processing of your personal data;
 - 5.1.6 where our processing of personal data is based on you having provided your consent or the processing is necessary for the performance of a contract with you, you have the right to receive your personal data, which you provided to us, in a structured, commonly used and machine-readable format or to require us to transmit that data to another controller; and

- 5.1.7 where our processing of your personal data is based on you having provided consent, the right to withdraw your consent to the processing at any time.
- 5.2 If you wish to exercise any of the rights set out above or if you have any questions about this GDPR Addendum, please contact us directly at dataprotectionofficer@greateagle.com.hk.

Version 1.1 January 2025

PRIVACY POLICY

Addendum for Mainland China

This PIPL Addendum applies only to individuals residing in or currently in Mainland China (For the purpose of this PIPL Addendum, “Mainland China” refers to the People’s Republic of China excluding the Hong Kong Special Administrative Region of the People’s Republic of China, the Macau Special Administrative Region of the People’s Republic of China and Taiwan) who use the Site, App, services or products of Great Eagle Holdings Limited (“Great Eagle”) and its subsidiaries (collectively, the “Great Eagle Group”, “we”, “us” or “our”).

These terms are set out in addition to and form an integral part of the Privacy Policy of Great Eagle Holdings Limited (“Great Eagle”) and its subsidiaries (collectively, “Great Eagle Group”, “we”, “us” or “our”) (“Privacy Policy”). This PIPL Addendum provides additional information about Personal Information (defined below) processing to comply with the Personal Information Protection Law of the People’s Republic of China (“PIPL”), and shall form an integral part of the Data Privacy of Great Eagle. In the event of any conflict or inconsistency between the Privacy Policy and this PIPL Addendum, the terms of this PIPL Addendum shall govern and prevail. If applicable, it should be read in conjunction with the specific privacy policy of our business divisions. If this PIPL Addendum or the Privacy Policy conflicts with applicable law, they shall be deemed amended to the extent required to comply with such applicable law. Member of the Great Eagle Group who provide product and services to you is the controller and processor of your Personal Information.

Please read and understand this PIPL Addendum carefully before using our products or services and providing your Personal Information to us.

1 Definition

- 1.1 “Personal Information” refers to all kinds of information (recorded via electronic means or otherwise) associated with an identified or identifiable natural person but does not include anonymized information. Personal information may include Sensitive Personal Information (defined below).
- 1.2 “Sensitive Personal Information” refers to Personal Information that, if leaked or used illegally, may easily lead to the infringement of the dignity of natural persons, or may seriously endanger their personal and property safety, including information relating biometric, religious beliefs, specific identities, healthcare, financial accounts, an individual’s whereabouts etc, as well as Personal Information of minors under the age of fourteen (14).
- 1.3 Unless defined otherwise, in this PIPL Addendum, all capitalised terms herein shall have the same meaning as given to them in the Privacy Policy of Great Eagle.

2 Collection, Disclosure, Sharing, Transfer and Publication of Personal Information

2.1 Collection of Sensitive Personal Information

2.1.1 The Personal Information that we may collect in order to provide the service or product you have purchased may contain your Sensitive Personal Information, which means any Personal Information that once disclosed, provided illegally or misused, may materially impact on your rights and interest. We may collect certain types of Sensitive Personal Information such as financial information (e.g., payment information and related bank details, etc.), identification data (e.g. identification documents, personal details, contact details etc.), lifestyle information (e.g. purchase and booking records, products and services preferences, leisure activities, names and age of children and companions etc) for the purposes specified in Section 6 of the Privacy Policy depending on the nature of your relationship with us. Specifically:

	Purposes	Personal data we may collect
1.	Processing any of your application of products, services or activities provided by us and/or our affiliates	• Name • Date, month and/or year of birth • Contact details • E-mail address • Mailing/correspondence address • Contact number • Membership number (if any) (collectively “Personal Data”)
3.	Registering you as a user of our websites and/or mobile platforms	• Name • Date, month and/or year of birth • Contact details • E-mail address • Mailing/correspondence address • Contact number
4.	To serve you better and/or maintain your personal data and/or information for browsing our websites and/or mobile platforms (as the case may be)	• Log Files • Tracking Data
5.	Following registration as a user, accessing your account information (including, but not limited to, your name, membership number, etc.) and managing your account (including, but not limited to, changing your password, updating your personal information, subscribing/unsubscribing from direct marketing	• Log Files • Membership number

6.	For you to make enquiries, complaints, and/or suggestions to us in relation to the Purposes and/or the Goods and Services (including, but not limited to, through an in-app text box on your mobile device or through our official social media page and/or our official website of, or by text message, email and/or mail, and/or other media whether now known or available in the future)	• Name • Contact number • E-mail address • Membership number
7.	Seeking your feedback, including through surveys, in relation to the Purposes and/or the Goods and Services (including, but not limited to, through an in-app text box on your mobile device or through our official social media page and/or our official website of, or by text message, email and/or mail	• Interests and favourite activities • Transaction information (including your characteristics and transaction behavior)
8.	Improving the Application, the Website, the Purposes, and our and our Affiliates' and Marketing Partners' Goods and Services	• Interests and favourite activities • Transaction information (including your characteristics and transaction behavior)
9.	Direct marketing and cross-marketing for the Marketing Subjects, subject to consent	• E-mail address • Gender • Date of birth, month and year of birth • Contact number • Mailing/ correspondence address • Tracking Data • Interests and favourite activities • Transaction information (including your characteristics and transaction behavior)
10.	Data analytics, profiling, information management and database administration	• Interests and favourite activities • Social media account information • Tracking Data • Marital status • Family status • Educational level • Occupation • Transaction information (including your characteristics and transaction behavior)

11.	Deterring, detection, investigation and/or prevention of activities that may violate, or may be suspected to violate, our policies or may be abusive, illegal, and/or criminal subject to the applicable laws and regulations in the Mainland China	• Name • Contact details • Date of birth, month and year of birth • Residential address
12.	Collection or recovery of any debt owed by you to us or our Affiliates	• Name • Contact details • Residential address Transaction information (including your characteristics and transaction behavior)
13.	The normal management, operation, and maintenance of the Application, the Website and the provision of the Goods and Services to you	• Name • Contact details • Mailing address • Membership number • Contact number • Username and password • Transaction information (including your characteristics and transaction behavior)
14.	Storing your personal data (whether by a single or multiple Affiliates (including us) or our Marketing Partners) for the purpose of sharing such personal data with our Affiliates and/or our Marketing Partners for any and all of the other Purposes listed above	• Name • Date of birth, month and year of birth • Contact details • E-mail address • Mailing/correspondence address • Contact number • Membership number (if any)

2.1.2 When it becomes necessary to collect any Sensitive Personal Information from you, we will solicit your consent in advance.

2.2 Disclosure and Sharing of Personal Information

2.2.1 Any member of the Great Eagle Group, including Langham Hospitality Group, who provide products and services to you, will collect, store, use, process, transmit, provide, disclose, or delete (together, “Process”) your Personal Information in accordance with our Privacy Policy, and we may only do so with your consent. Where the applicable data protection laws and regulations of Mainland China require us to provide separate consent under certain circumstances, we will only Process such Personal Information upon obtaining your separate consent.

2.3 Transfer and Share of Personal Information

2.3.1 To facilitate the purposes mentioned under the Privacy Policy, and without prejudice to relevant laws and regulations, we may transfer and/or disclose your personal information to any member of the Great Eagle Group, and/or third parties who will Process your Personal Information according to their own purposes and methods of Processing (together, “Third Party Personal Information Handlers”). These Third Party Personal Information Handlers may be located within or outside Mainland China. You understand, authorise and consent that we may transfer your personal data outside Mainland China to our headquarters in Hong Kong and other offices of our subsidiaries.

We will not transfer your Personal Information to any company, organization or individual outside of Great Eagle Group including Langham Hospitality Group, except under the following circumstances:

- (i) transfer with separate consent. After obtaining your separate consent, we will transfer your Personal Information to other parties in accordance with this PIPL Addendum;
- (ii) when we are involved in any actual or proposed transfer of business, transfer of shares, re-structuring, amalgamation, merger, sale, transfer or purchase of our business;
- (iii) we may otherwise transfer your Personal Information in accordance with applicable laws and regulations, requirements under legal proceedings, compulsory administrative or judicial requirements.

2.3.2 When we share your Personal Information with any third parties, we will strive to ensure (including but not limited to using contractual measures or adopt encryption for transfer to ensure) that such third parties comply with this Privacy Policy and other appropriate confidentiality and security measures that we require them to comply with when using your Personal Information, except for the Personal Information you provide directly to the third parties through the use of their services. Where required by applicable regulations of Mainland China and where the sharing of Personal Information will bring higher risks to you, we will notify you of such high risks.

2.3.3 We will also transfer your Personal Information to any third party if it involves any merger, acquisition, any actual or proposed transfer of business, transfer of shares, re-structuring, amalgamation, sale, transfer or purchase of our business or insolvency and liquidation proceedings, where, if the transfer of your Personal Information is involved, we will inform you of the name and contact information of the succeeding third party and require them to hold your Personal Information continue to be bound by the Privacy Policy and its PIPL Addendum; otherwise, we will require that such third party resolicit your authorization or consent.

2.3.4 When we share your Personal Information with any third parties, we will strive to ensure (including but not limited to using contractual measures or adopt encryption for transfer to ensure) that such third parties comply with this Privacy Policy and

other appropriate confidentiality and security measures that we require them to comply with when using your Personal Information, except for the Personal Information you provide directly to the third parties through the use of their services. Where we are jointly processing in your Personal Information, we shall ensure that our responsibilities in processing your Personal Information are clearly and distinctively defined.

- 2.3.5 We may transfer or disclose your Personal Information (including Sensitive Personal Information) to third parties located outside Mainland China only with your separate consent. We may not be able to provide certain services to you if we do not carry out such transfer.

2.4 Public Disclosure

- 2.4.1 We will not disclose your Personal Information to the public, unless:

- (i) your prior explicit consent has been obtained (for example, at any public event organized by us, we will not disclose to the public the Personal Information of the winner unless and until the explicit authorization and consent from the winner is obtained); or
- (ii) we do so pursuant to any mandatory requirement of any applicable law or regulation, legal proceeding or competent government authority.

3 Purpose and Use of Personal Information

- 3.1 In general, we process your Personal Information with your consent, and where appropriate, with separate consent from you for processing your Personal Information under specific circumstances required by the applicable data protection laws and regulations in Mainland China. Subject to your consent, your Personal Information may be Processed in our headquarters in Hong Kong as well as in other countries, including Mainland China.
- 3.2 You acknowledge and agree that we shall not be required to obtain your consent to Process your Personal Information if any of the following situations applies:
- 3.2.1 when necessary for the establishment or performance of a contract, or for managing human resources matters;
 - 3.2.2 where necessary for fulfilling statutory duties or obligations, including but not limited to, those directly related to: (a) national security and national defence; (b) criminal investigation, prosecution and trial and execution of court orders, judgments or related matters; or (c) public security, public health, or major public interest;
 - 3.2.3 where necessary for responding to public health emergencies, or for the protection of life, well-being and safety of property of a natural person in emergencies;
 - 3.2.4 for the reasonable processing of person information for news reporting, media supervision, and other activities conducted in the public interest;

- 3.2.5 for the reasonable processing of Personal Information that has been disclosed publicly by yourselves or is otherwise legally disclosed; and
- 3.2.6 in other circumstances as provided by laws or administrative regulations.

4 Your Rights

- 4.1 You (or your next of kin or you acting on behalf of your minors, as permitted by applicable data protection laws and regulations of Mainland China) are entitled to exercise the following data subject rights under the applicable data protection laws and regulations of Mainland China:
 - 4.1.1 access, copy, (where your Personal Information is inaccurate or incomplete) correct and/or supplement your Personal Information held by us;
 - 4.1.2 obtain a copy of your personal data;
 - 4.1.3 restrict or reject the Processing of your Personal Information held by us;
 - 4.1.4 request deletion or de-registration of your Personal Information which is held by us (where the purposes of Processing have been or cannot be fulfilled or are no longer necessary, where you withdraw your consent, where you no longer use our products and/or services, or the purposes described in Clause 2 of this PIPL Addendum have been achieved or accomplished, where we cease to provide the Services or the retention period ends, where there is a breach of applicable law in our Processing or otherwise required by applicable law);
 - 4.1.5 withdraw your consent to us Processing your Personal Information or change the scope of your consent;
 - 4.1.6 request us to transfer your Personal Information to another organisation, if such transfer is permitted by applicable laws;
 - 4.1.7 restrict the information system in automated decision making if any of your legal rights or interests are significantly affected. You may require an explanation or refuse to accept our decisions made by the automated decision-making system, by contacting us in the way specified in Section 10 of the Privacy Policy;
 - 4.1.8 request to explain our rules on Processing of your Personal Information.
- 4.2 If you wish to exercise any of the rights in paragraph 3.1 of this PIPL Addendum above, you may contact us in the way specified in paragraph 10.5 of the Privacy Policy.
- 4.3 We will endeavour to use appropriate technical means to ensure that you can exercise the above data subject access rights through the use of our Services. In processing your requests relating to your data subject rights, we may ask you to authenticate your identity in order to protect the safety of your Personal Information. However, please note we may refuse your requests under the following circumstances:-
 - 4.3.1 circumstances relevant to the fulfilment of our obligations under laws and regulations, including our provision of your Personal Information (including

- your Sensitive Personal Information) generated during the transaction between you and us to the regulatory authority(ies) and or other governmental departments under the laws and regulations of Mainland China;
- 4.3.2 the data retention period required by any law or administrative regulation has not expired, or it is difficult to delete personal data technically (in such cases, we will take necessary security protection measures to ensure the security of your Personal Information or anonymize such personal data);
 - 4.3.3 circumstances directly related to national security and defence security;
 - 4.3.4 circumstances directly related to public security, public health, or significant public interest;
 - 4.3.5 circumstances directly related to criminal investigation, prosecution and trial, and execution of court decision;
 - 4.3.6 circumstances where we have sufficient evidence to prove that you have subjective malice, or you are abusing your rights;
 - 4.3.7 circumstances where protection of your or other individual's life, property and other important lawful rights is involved;
 - 4.3.8 circumstances where responding to your request will cause serious harm to the lawful rights and interests of you or other individuals or organizations (including us); or
 - 4.3.9 circumstances where trade secrets are involved.
- 4.4 To the extent permitted by relevant laws and regulations, we reserve the right to (a) refuse unreasonable requests (for example, requests which infringe the privacy of others); and (b) charge a reasonable fee for the cost of processing any request set out in the section 4 headed "Your Rights" of this PIPL Addendum.

5 Personal Information of Minors

- 5.1 Our services and products target those who are above the age of eighteen (18). We will not knowingly collect or maintain Personal Information from persons who are under 14 years of age without separate consent from a parent or guardian; and will only collect or maintain Personal Information from persons between 14 and 18 years of age if explicit consent has been obtained from such person or his/her parent or guardian. The Personal Information of a minor that we have collected with the consent of the parent or guardian will not be shared, transferred or disclosed publicly, unless it is allowed under the applicable law, the explicit consent of the parent or guardian is obtained, or it is necessary to do so in order to protect the minor.
- 5.2 If we discover that we have collected the Personal Information of any minor without first obtaining the verifiable consent of the parent or statutory guardian, we will delete such personal data as soon as practicable pursuant to the applicable law. If parents or legal guardian are aware that Personal Information of any minors aged below eighteen (18) under their care have been provided to us without consent, please notify us immediately to delete such personal data.
- 5.3 Where we have obtained separate consent from parents or guardians for Processing their minors' Personal Information, we will only Process, retain and protect those minors' Personal Information in the same manner and in the same locations as set out in the Privacy Policy (as supplemented by this Appendix for Mainland China). If the parents or guardians refuse to provide separate consent for our Processing of their minors' Personal Information which is necessary, we may not be able to provide certain Services for their minors. To

exercise any data subject rights for minors, please refer to paragraph 4 of this PIPL Addendum.

- 5.4 If you are the guardian of a minor and you have any question regarding the Personal Information of the minor, please contact us in the way specified in section 10 of the Privacy Policy

6 Retain and Store Your Personal Information

- 6.1 Your Personal Information will be retained by us only for as long as necessary to fulfil the purposes mentioned in the Privacy Policy, or for a duration as required or permitted by laws and regulations.
- 6.2 The criteria used to determine our retention periods may include one or more of the following:
- 6.2.1 as long as we have an ongoing relationship with you;
 - 6.2.2 as required by a legal obligation to which we are bound; and
 - 6.2.3 as deemed advisable in light of our legal position (such as in regard of the applicable statute of limitation, litigation, audits or regulatory investigation).

7 Protect Your Personal Information

- 7.1 In order to ensure the correct use and to maintain the accuracy of Personal Information collected from you, as well as to prevent unauthorised or accidental access, disclosure, alteration, loss or other use of Personal Information, we have implemented various internal management policies (including physical, electronic and management measures) and various security technologies and procedures based on the classification of Personal Information we collect from you. For example:
- 7.1.1 where we collect Personal Information online, we use an industry standard for encryption over the Internet to protect Personal Information;
 - 7.1.2 our websites have firewalls in place, which should protect Personal Information collected from you against unauthorised or accidental access;
 - 7.1.3 where required under applicable data protection laws and regulations of Mainland China, we will encrypt and/or de-identify your Personal Information;
 - 7.1.4 your Personal Information will only be accessed by our personnel on a “need-to-know” basis;
 - 7.1.5 we ensure that our personnel are regularly trained in data protection matters; and
 - 7.1.6 in order to mitigate any potential risks of unauthorised Processing of your Personal Information, we maintain a security incident response plan. Where required by applicable regulations of Mainland China, we will also seek to inform you and the relevant authorities of any incidents concerning the Personal Information we Process on your behalf.

- 7.2 However, please understand that, due to technical and risk prevention limitations, even if we have made our best effort to enhance security measures, we cannot ensure that the information is absolutely safe. You should note that the systems and communication networks you use to access our Services may be subject to problems beyond our control. Therefore, you are advised to protect against unauthorised access to your password and credit card details. When using a shared computer, make sure you sign out from your account when you are finished.
- 7.3 To the extent required under applicable laws of Mainland China, we will be responsible for the Personal Information security incidents.

8 Automated Decision Making

- 8.1 For the purposes of this PIPL Addendum for Mainland China, “Automated Decision Making” means the use of computer programs or algorithms to automatically analyse or assess personal behaviours, habits, interests or hobbies, or financial, health, credit or other status, and make automated decisions based on such analysis or assessment.
- 8.2 From time to time, we may process your Personal Information listed under the section headed “5. Collection of Personal Information Data” of the Privacy Policy through Automated Decision Making in each of the following scenarios:
- 8.2.1 for the purpose of sending you direct marketing communications and/or push notifications which contain content specifically targeting you;
- 8.2.2 for the purpose of providing you with personalised offers and services specifically targeting you; and
- 8.2.3 for the purpose of enhancing your browsing experience at our digital touchpoints (e.g. Site, App, mini programs on WeChat) with personalised offers and contents specifically targeting you.
- 8.3 You have the following rights in respect of Automated Decision Making:
- 8.3.1 where we Process your Personal Information through Automated Decision Making to send direct marketing messages or push notifications to you, you have the right to opt-out from such Automated Decision Making processing;
- 8.3.2 where the decision made through the Automated Decision Making process has a material impact on your personal interest, you also have the right to request for an explanation of such decision, and the right to refuse our Processing through Automated Decision Making; and
- 8.3.3 If you wish to exercise any of the rights in paragraph 4.3 of this PIPL Addendum above, you may contact us in the way specified in section 10 of the Privacy Policy of the Great Eagle Group.

9 Updates to this PIPL Addendum

- 9.1 This PIPL Addendum is effective from January 2025. We may update, change, modify or amend the Privacy Policy and this PIPL Addendum from time to time. When required under applicable laws and regulations, we may seek your consent for such updates. If you do not provide your consent, we may be unable to continue providing our products or services to you. You may check the most updated Privacy Policy and this PIPL Addendum from time to time on our website.

10 Contacting Us

Should you have any questions in respect of this PIPL Addendum, please contact us directly at any time with any of the following methods:

- 10.5.1 By email (please send your registered username (if applicable), name, email and mobile number to dataprotectionofficer@greateagle.com.hk); or
- 10.5.2 By post (please send your registered username (if applicable), name, email and mobile number to Data Protection Officer, 33rd Floor, Great Eagle Centre, 23 Harbour Road, Wanchai, Hong Kong).

Version 1.1 January 2025