

# Privacy policy

## 1. Introduction

- 1.1 We are committed to safeguarding the privacy of all users of SIM Check App ("SIM Check").
- 1.2 This policy applies where we are acting as a data controller with respect to the personal data of such persons; in other words, where we determine the purposes and means of the processing of that personal data.
- 1.3 In this policy, "we", "us" and "our" refer to the developer "Aitrigo.com Limited" . For more information about us, see Section 10.

## 2. Credit

- 2.1 This document was created using a template from Docular (<https://seqlegal.com/free-legal-documents/privacy-policy>).

## 3. The personal data that we collect

- 3.1 In this Section 3 we have set out the general categories of personal data that we process and, in the case of personal data that we did not obtain directly from you, information about the source and specific categories of that data.
- 3.2 We may process data enabling us to get in touch with you ("**contact data**"). The contact data may include your name, email address, telephone number, postal address and/or social media account identifiers.
- 3.3 We may process your SIM Check user account data ("**account data**"). The account data may include your account identifier, name, email address, business name, account creation and modification dates, personal settings and marketing preferences. The primary source of the account data is you, although some elements of the account data may be generated by SIM Check.
- 3.4 We may process information contained in or relating to any communication that you send to us or that we send to you ("**communication data**"). The communication data may include the communication content and metadata associated with the communication.
- 3.7 We may process data about your use of SIM Check and services ("**usage data**"). The usage data may include your IP address, geographical location, referral source, length of visit, page views as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system.

## 4. Purposes of processing and legal bases

- 4.1 In this Section 4, we have set out the purposes for which we may process personal data and the legal bases of the processing.
- 4.2 **Operations** - We may process your personal data for the purposes of operating SIM Check, the processing and fulfilment of orders. The legal basis

for this processing is our legitimate interests, namely the proper administration of SIM Check, services and business.

- 4.3 **Publications** - We may process account data for the purposes of publishing such data on SIM Check and elsewhere through our services in accordance with your express instructions. The legal basis for this processing is our legitimate interests, namely the publication of content in the ordinary course of our operations.
- 4.4 **Relationships and communications** - We may process contact data, account data, and/or communication data for the purposes of managing our relationships, communicating with you (excluding communicating for the purposes of direct marketing) by email, SMS, post, fax and/or telephone, providing support services and complaint handling. The legal basis for this processing is our legitimate interests, namely communications with SIM Check visitors, service users, individual customers and customer personnel, the maintenance of relationships, and the proper administration of SIM Check, services and business.
- 4.5 **Direct marketing** - We may process contact data, account data and/or transaction data for the purposes of creating, targeting and sending direct marketing communications by email, SMS, post and/or fax and making contact by telephone for marketing-related purposes. The legal basis for this processing is our legitimate interests, namely promoting our business and communicating marketing messages and offers to SIM Check visitors and service users.
- 4.6 **Research and analysis** - We may process usage data for the purposes of researching and analysing the use of SIM Check and services, as well as researching and analysing other interactions with our business. The legal basis for this processing is our legitimate interests, namely monitoring, supporting, improving and securing SIM Check, services and business generally.
- 4.7 **Record keeping** - We may process your personal data for the purposes of creating and maintaining our databases, back-up copies of our databases and our business records generally. The legal basis for this processing is our legitimate interests, namely ensuring that we have access to all the information we need to properly and efficiently run our business in accordance with this policy.
- 4.8 **Security** - We may process your personal data for the purposes of security and the prevention of fraud and other criminal activity. The legal basis of this processing is our legitimate interests, namely the protection of SIM Check, services and business, and the protection of others.
- 4.9 **Insurance and risk management** - We may process your personal data where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks and/or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.

4.10 **Legal claims** - We may process your personal data where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

4.11 **Legal compliance and vital interests** - We may also process your personal data where such processing is necessary for compliance with a legal obligation to which we are subject or in order to protect your vital interests or the vital interests of another natural person.

## **5. Providing your personal data to others**

5.1 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice.

5.2 Your personal data held in SIM Check database will be stored on the servers of our hosting services provider Alibabacloud in Hong Kong.

5.3 In addition to the specific disclosures of personal data set out in this Section 5, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise, or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

## **6. International transfers of your personal data**

6.1 In this Section 6, we provide information about the circumstances in which your personal data may be transferred to a third country under UK and/or EU data protection law.

6.2 The hosting facilities for SIM Check are situated in Hong Kong. The competent data protection authorities have made an adequacy determination with respect to the data protection laws in Hong Kong.

6.3 You acknowledge that personal data that you submit for publication through SIM Check or services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

## **7. Retaining and deleting personal data**

7.1 This Section 7 sets out our data retention policies and procedures, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

7.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes. We retain your personal data as long as needed to provide services or products to you, or as required or permitted by applicable laws, such as tax laws.

7.3 We will only retain your personal data within the time required to achieve the purpose of the privacy policy, unless an extension of the retention period is needed or if it is legally permitted.

7.4 Notwithstanding the other provisions of this Section 7, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

## **8. Your rights**

8.1 In this Section 8, we have listed the rights that you have under data protection law.

8.2 Your principal rights under data protection law are:

- (a) **the right to access** - you can ask for copies of your personal data;
- (b) **the right to rectification** - you can ask us to rectify inaccurate personal data and to complete incomplete personal data;
- (c) **the right to erasure** - you can ask us to erase your personal data;
- (d) **the right to restrict processing** - you can ask us to restrict the processing of your personal data;
- (e) **the right to object to processing** - you can object to the processing of your personal data;
- (f) **the right to data portability** - you can ask that we transfer your personal data to another organisation or to you;
- (g) **the right to complain to a supervisory authority** - you can complain about our processing of your personal data; and
- (h) **the right to withdraw consent** - to the extent that the legal basis of our processing of your personal data is consent, you can withdraw that consent.

8.3 You may exercise any of your rights in relation to your personal data by written notice to us, using the contact details set out below.

## **9. Amendments**

9.1 We may update this policy from time to time by publishing a new version on SIM Check.

9.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

## **10. Our details**

10.1 SIM Check is developed by Aitrigo.com Limited whose address is at Unit B&C, 20/F., Fullwin Commercial Centre, 573 Nathan Road, Kowloon, Hong Kong.

10.2 You can contact us:

- (a) by post, to the postal address given above; or
- (b) by email, using the email address published on SIM Check.

**11. Data protection officer**

11.1 Our data protection officer's contact detail: [eric.tang@aitrigo.com](mailto:eric.tang@aitrigo.com).