

## Privacy Statement

This Privacy Statement will help you understand how Lobahn Technology Limited uses and protects the data you provide to us when you visit and use [www.lobahn.com](http://www.lobahn.com).

We reserve the right to change our privacy policy at any time, of which you will be promptly updated. To ensure that you are up to date with the latest changes, we advise you to frequently visit this page.

Our privacy policy can be summarized as follows:

- Individual Users' information is used primarily for the purpose of discovering and introducing career opportunities to them.
- Corporate Users' information is used primarily for the purpose of discovering and introducing Individual Users to them.
- We do not knowingly share identifiable information outside our Group without your consent.
- We protect the confidentiality of your information to the best of our abilities.

We pledge to comply fully with the requirements of the Personal Data (Privacy) Ordinance, Chapter 486 of the Laws of Hong Kong. In doing so, we endeavor to ensure compliance by our officers and staff to strict standards of security and confidentiality in respect of all personal information and data submitted by users and we will not, subject to the terms herein, knowingly release such information to anyone without the prior consent of the relevant users of the Site.

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You are strongly recommended to read this Privacy Statement carefully to understand our policy and practices with regard to the treatment of personal information and data provided by the Users on the Site. This Privacy Statement is applicable to both registered and unregistered Users, and the terms herein may be updated, revised, varied and/or amended from time to time as we may deem necessary and/or appropriate.

In this Privacy Statement, the following terms shall have the respective meanings specified below unless the context otherwise requires:

"Lobahn" means Lobahn Technology Limited.

"We", "us" or "our" means Lobahn Technology Limited and its affiliates/associated companies/agents.

"Individual User" means an individual representing himself only who registers on the Site to obtain services offered by us.

"Corporate User" means an individual representing his Employer who registers on the Site to obtain services offered by us on behalf of his Employer.

"Candidate" means an individual professional who uses the Site.

"Employer" means a corporate entity that uses the Site.

"Profile Data" means the employment-related personal data, including Matching Factors, submitted by the Individual User.

"CV" means the document submitted by the Individual User summarizing his employment history, professional experience and related background information.

"Image" means the image file submitted by the Individual User.

“Position Listing” means the position description and desired candidate qualities submitted by the Corporate User related to a position opening.

“Matching Factors” means data collected from Individual Users and Corporate Users for the purposes of measuring and reporting the suitability of the User’s background with a career opportunity offered by the Employer.

“Site” means any website or mobile application owned and operated by Lobahn Technology Ltd. and its affiliates/associated companies/agents.

“Users” includes references to generic Users and registered Users.

For ease of comprehension, throughout this document the singular includes the plural, and the male includes the female.

You need not supply any personal data in order to access the Site. When you participate in, access, use or sign up to any of our services via the Site, personal data is collected from you to enable us to provide you with the services. You may decline to provide us with the requested personal data, but in such case, we may not be able to provide the services to you. By submitting your personal data to us, you:

- (a) consent to our collecting, using, disclosing and processing your personal data for the purposes described below;
- (b) consent to our disclosing your personal data to our third-party service providers or agents (whether within or outside Hong Kong) for the purposes described below.

If you have questions regarding this Privacy Statement, please contact our User Services team via email at [hello@lobahn.com](mailto:hello@lobahn.com).

#### Purpose of Collection and Use of Personal Data

In the course of using the Site, you may disclose or be asked to provide personal information, personal data or an uploaded image. In order to have the benefit of and enjoy various services offered by the Site, it may be necessary for you to provide us with personal information. Although you are not obliged to provide the information as requested on the Site, we will not be able to render certain services on the Site in the event that you fail to do so.

Our purposes for collecting and using the information and data on the Site include but are not limited to the following:

- a) for the daily operation of the services provided to Users
- b) to assist Individual Users to discover suitable career opportunities with Corporate Users and to assist Corporate Users to assess the suitability of Individual Users for employment
- c) to provide Users with various services offered by the Site, position openings and promotional and marketing materials
- d) to handle and follow up on enquiries, requests and complaints from Users
- e) to contact Users regarding administrative notices and communications relevant to his use of the Site and to respond to Users’ enquiries or requests
- f) to assist us with developments for future marketing purposes or other internal purposes
- g) to verify the identity of Users who have posted position listings, materials, representations, messages, views or comments or such other information (collectively “Information”) on the Site
- h) to identify Users who have viewed the Information posted on the Site
- i) to allow Users to enjoy the benefits of the Site by enrolling for special events and promotions hosted by us

- j) to identify Users who have enjoyed the benefits of the Site by receiving and using marketing promotional materials
- k) to facilitate our use of Users' personal data for the provision of services offered by us and our marketing services and/or special events
- l) to obtain statistics about Users to analyze usage of the Site in order to help its further development for internal use; and
- m) for purposes other than the above mentioned which are related to the provision of our products and services as we may deem fit.

Users agree that by accessing the Site, they are eighteen (18) years of age or older and have read, understood, and agree to be bound by our Terms and Conditions.

We strive to only collect personal data which are necessary and adequate but not excessive in relation to the purposes set out hereinabove.

If we require the use of your personal data for a purpose other than those set out hereinabove, we will ask for your consent to the same.

#### Collection of Personal Data

We may collect personal information and/or data about a User such as his name, log-in ID and password, email address, phone number, country of residence, education level, target salary, work experience and other factors that are not otherwise publicly available. Occasionally, we may also collect additional personal information or data from a User in connection with contests, surveys or special offers.

Only our duly authorized staff will be permitted to access Users' personal information and data, and we shall not release such personal information and data to any third parties save and except for the circumstances listed out under the section headed "Disclosure or Transfer of Data".

#### Disclosure or Transfer of Data

We endeavor to take all practicable steps to keep all personal information and data of Users confidential and/or undisclosed, subject to the following:

Generally speaking, we will only disclose or transfer Users' personal information or data to our personnel and staff for the purpose of providing services to Users who have made specific requests for such information with Users' prior consent. However, we may disclose or transfer such information to third parties under the following circumstances:

- a) where the information is disclosed or transferred to any third-party suppliers or external service providers who have been duly authorized by us to use such information and who will facilitate the services on the Site, under a duty of confidentiality
- b) where the information is disclosed or transferred to our agents, affiliates or associated companies who have been duly authorized by us to use such information
- c) where permitted under the Terms and Conditions
- d) where we need to protect and defend our rights and property
- e) where we consider necessary to do so in order to comply with applicable laws and regulations, including without limitation compliance with a judicial proceeding, court order, or legal process served on the Site
- f) where we deem it necessary to deliver the products and services that we offer and cultivate a positive user experience; and
- g) where we deem it necessary to maintain and improve the services on the Site.

Personal data collected via the Site may be transferred, stored and processed in any country in which Lobahn or its affiliates or associated companies operate. By using the Site, Users are deemed to have agreed to, consented to, and authorized us to disclose and/or transfer their personal information and data under the circumstances stated above, as well as to any transfer of information (including the Information) outside of the User's country.

#### User Profile

We create for all Individual Users a personal Profile ("Lobahn Profile"). A Lobahn Profile consists of your name, your image, your employment history and various other pertinent employment-related factors, along with your uploaded CV. Corporate Users approved by us post position listings on our Site and Individual Users are invited to connect with the Corporate Users. You may share your Lobahn Profile with Corporate Users in the following ways:

#### Manually

You may choose on a case-by-case basis to which Corporate Users your Lobahn Profile and CV are sent.

#### Auto Reply

You may set your privacy setting to Auto Reply, in which case your Lobahn Profile and CV will be sent automatically to all Corporate Users whose position listings generate for you a Jobstream Suitability Ratio™ ("JSR™") score of 80% or more.

You may alter your Auto Reply settings at any time. Corporate Users cannot access your Lobahn Profile except as determined by you and your choice of Auto Reply settings above.

All information provided when creating a Lobahn Profile (including your name, email address, telephone number, the various pertinent employment-related factors and CV) may be used by us for the purpose of improving employment opportunities for you or for tailoring specific products to you.

Individual Users can modify their Lobahn Profile, their CVs or their privacy settings in relation to their Lobahn Profile at any time by going to the Dashboard area of the Site.

You may also elect to clear your Lobahn Profile altogether at any time. Cleared Lobahn Profiles may still however be stored by us in testing or backup systems for a period of time. We reserve the right to disable or clear a Lobahn Profile at any time at our sole discretion.

Corporate Users that conduct talent searches on the Site are asked by us to comply with all relevant laws and obligations relating to the use and disclosure of personal information. However, the use of your information (personal or otherwise) by these Corporate Users is not within our control and we cannot accept responsibility for the conduct of these companies.

#### Promotional Materials/Marketing Materials

We may from time to time send to Users and Users of the Site career openings and marketing materials based on the personal information and data they have provided to us. We may use Users' data in direct marketing. In this connection, please note that:

- a) the name, log-in ID and password, contact details, country of residence, education level, work experience and various employment-related factors of Users held by us from time to time may be used by us in direct marketing
- b) the following classes of services, products and subjects may be marketed:

- i. career services offered other than by us
  - ii. various courses and programs for Users seeking career opportunities
  - iii. special events hosted by us and our affiliates, including but not limited to courses, workshops, and competitions
  - iv. reward, loyalty or privilege programs and related products and services
  - v. special offers including coupons, discounts, group purchase offers and promotional campaigns
  - vi. products and services offered by our affiliates and advertisers
  - vii. donations and contributions for charitable and/or non-profit making purposes.
- c) the above products, services and subjects may be provided or solicited by us and/or:
- i. our affiliates
  - ii. third party service providers providing the products, services and subjects listed in paragraph (b) above; and
  - iii. charitable or non-profit making organizations.
- d) in marketing the above services, products, and subjects, at no time will we provide the data described in paragraph (a) above to any of the persons described in paragraph (c) above for without the Users' written consent (which includes an indication of no objection) for that purpose.

#### Access To or Request for Correction of Data

Any User may make amendments directly to his own personal information and data kept with us, or by contacting our User Services Department via email at [hello@lobahn.com](mailto:hello@lobahn.com).

In the event that a User wishes to access or amend his personal information and data, we may request him to provide personal details in order to verify and confirm his identity.

#### Cookies and Log Files

We do not collect any personally identifiable information from any Users whilst they visit and browse the Site. When Users access the Site, we record their visits only and do not collect their personal information or data. The Site's server software will also record the domain name, server, address and track the pages Users visit and store such information in "cookies" and gather and store information like internet protocol (IP) addresses, browser type, referring/exit pages, operating system, date/time stamp, and clickstream data in log files. All these are done without the User being aware that they are occurring.

Users can choose to accept or decline cookies. Most web browsers automatically accept cookies, but Users can modify their individual browser settings to decline cookies if they prefer. However, Users should note that disabling cookies on their browser may prevent them from taking full advantage of the Site.

We do not link the information and data automatically collected in the above manner to any personally identifiable information. We generally use such automatically collected information and data to estimate the audience size of the Site, gauge the popularity of various parts of the Site, track Users' movements and number of entries in our promotional activities and special events, measure Users' traffic patterns and administer the Site. Such automatically collected information and data will not be disclosed save and except in accordance with the section headed "Disclosure or Transfer of Data".

In addition, our third-party advertising companies may place cookies on some of the pages Users visit on the Site. These cookies are designed to collect non-personally identifiable information in order to analyze Users' interests and searches on our Site to help deliver more relevant advertisements when Users visit our Site and other websites. The non-personally identifiable information collected by these

cookies may be shared with other third parties for purpose of managing and targeting advertisements and for market research analysis.

#### Links to Other Websites

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

Non-registered Users who gain access to the Site via their accounts in online social networking tools (including but not limited to Facebook, Twitter, Google, Instagram, WeChat, WhatsApp and Sina Weibo) are deemed to have consented to the terms of this Privacy Statement, and such Users' personal data which they have provided to those networking tools may be obtained by us and be used by us and our authorized persons in and outside of the User's country for the purpose of providing services and marketing materials to the Users. We and our authorized personnel may gain access and use the personal data of such Users so obtained, subject to the other provisions of this Privacy Statement.

This Privacy Statement is only applicable to the Site. Users are reminded that this Privacy Statement grants no protection to Users' personal information and data that may be exposed on websites other than the Site, and we are not responsible for the privacy practices of such other websites. Users are strongly recommended to refer to the privacy policies of such other websites before using those websites.

#### Testimonials

We may post Users' testimonials on the Site, which may contain personally identifiable information such as the Users' names. We will obtain the Users' consent prior to posting the testimonials to post their names along with their testimonials.

#### Security

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

All personal information and data provided by Users are only accessible by the authorized personnel of us or our authorized third parties, and such personnel shall be instructed to observe the terms of this Privacy Statement when accessing such personal information and data. Users' personal information and data will only be kept for as long as is necessary to fulfill the purpose for which it is collected. A Registered User should safeguard his unique Username and Password by keeping it secret and confidential and never share these details with anyone.

We use a third-party service provider to facilitate the electronic payment transactions on the Site.

We follow generally accepted industry standards to protect the personal information and data submitted by Users to the Site, both during transmission and once we receive it. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, while we strive to protect Users' personal information and data against unauthorized access, we cannot guarantee its absolute security.

### Retention of Personal Data

Once we obtain a User's personal information or data, it is maintained securely in our system for the period necessary to fulfill the purposes for which the data was collected as set out under the section headed "Purpose of Collection of Personal Data". Once registered, a User may terminate his Usership of the Site by disabling his account via the Site or by contacting our User Service Department via email at [hello@lobahn.com](mailto:hello@lobahn.com). We may retain a User's personal information even after a User has closed his account if retention is reasonably necessary to comply with our legal obligations, meet regulatory requirements, resolve disputes between Users, prevent fraud and abuse, or enforce this Privacy Statement and the "Terms and Conditions".

### Changes in this Privacy Statement

We reserve the right to update, revise, modify or amend this Privacy Statement at any time as we deem necessary, so Users are strongly recommended to review this Privacy Statement frequently. If we decide to update, revise, modify or amend this Privacy Statement, we will post those changes to this webpage and/or other places as we deem appropriate so that Users would be aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it.

If we make material changes to this Privacy Statement, we will notify Users on this webpage, by email, or by means of a notice on the home page of the Site. Such changes to this Privacy Statement shall apply from the time that we post the same on this webpage. Users' continued use of the Site and services on the Site shall constitute acceptance of the changes to this Privacy Statement.

### Enquiries, Data Access and Correction

Should you have any enquiries relating to this Privacy Statement, or you wish to access or correct your personal data held by us, please email us at [hello@lobahn.com](mailto:hello@lobahn.com), or telephone us at +852 5999 6200, or write to us at the following address:

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