

Privacy Policy Statement

1. Pledge

Sustainable Wellness Limited (the “Sustainable Wellness”, “we”, “us”, or “our”) recognizes and understands that customers, website visitors, and mobile application users are concerned about the privacy of Personal Data (defined below). Sustainable Wellness pledges to comply with the requirements of the Personal Data (Privacy) Ordinance (Cap. 486) (the “PDPO”) of the Laws of the Hong Kong Special Administrative Region of the People’s Republic of China (“Hong Kong”).

This Privacy Policy Statement outlines Sustainable Wellness’s practices and the choices you have concerning the collection and use of your Personal Data. This Privacy Policy Statement should be read together with the applicable Terms and Conditions of the relevant service, website, and/or mobile application provided by Sustainable Wellness (the “Terms and Conditions”), provided that, in the event of any inconsistency between this Privacy Policy Statement and the Terms and Conditions concerning matters relating to Personal Data, this Privacy Policy Statement shall prevail. This Privacy Policy Statement should also be read together with the applicable personal information collection statement of the relevant service, website, and/or mobile application provided by Sustainable Wellness (the “PICS”) (as listed here: www.aiaaltawellness.com.hk/static/pic-en.pdf), provided that, in the event of any inconsistency between this Privacy Policy Statement and the PICS concerning matters relating to Personal Data, the PICS shall prevail.

2. Collection of Information

You may be invited to provide to Sustainable Wellness your Personal Data in-person, on Sustainable Wellness 's relevant website(s) or mobile application(s), or through other media on a voluntary basis for different purposes at different times.

3. Log Files

When you visit Sustainable Wellness’s website(s) and/or use Sustainable Wellness’s mobile application(s) without logging in, if any, the servers of Sustainable Wellness will collect only data relating to your visits to/use of such website(s) and/or use such mobile application(s), including but not limited to your Internet Protocol address, domain name, browser type and access time (“Log Files”) but will not collect your Personal Data. However, if you register on our website and log in to your account, we may combine your Log Files with other Personal Data we collect from you, in which case such Log Files shall be considered your Personal Data for the purposes of, and will be used in accordance with, this Privacy Policy Statement and the PICS.

4. Use of Cookies and other Tracking Mechanisms

When you browse the website(s) of Sustainable Wellness and/or use the mobile application(s) of Sustainable Wellness, cookies will be stored in your computers, mobile phones or other devices for internal navigation and programming only. We may use cookies and other tracking mechanisms described below to track information about your use of Sustainable Wellness’s website(s) and/or mobile application(s) (“Tracking Data”). We may combine this Tracking Data with other Personal Data we collect from you, in which case such Tracking Data shall be considered your Personal Data for the purpose of, and will be used in accordance with, this Privacy Policy Statement and the PICS.

Cookies are alphanumeric identifiers that we transfer to your computers, mobile phones or other devices through your web browser for record-keeping purposes. Some cookies allow us to make it easier for you to navigate Sustainable Wellness's website(s) and/or mobile application(s), while others are used to enable a faster log-in process, or to allow us to store and track information about your interests and preferences at Sustainable Wellness's website(s) and/or Sustainable Wellness's mobile application(s).

We may also engage third parties to track and analyse non-personally identifiable data from the website(s) or mobile application(s). We use the data collected by such third parties to help us administer and improve the quality of Sustainable Wellness's website(s) or mobile application(s) and to analyse usage of the same. This is unrelated to and separate from your Personal Data. Such third parties may combine the non-personally identifiable data that we provide about you with other information that they have collected. You can edit your browser settings to disable cookies but to do so you may not be able to utilize certain functionality of the website(s) and/or mobile application(s) (where applicable) of Sustainable Wellness.

If you interact with Sustainable Wellness on social media platforms, Sustainable Wellness can interact with you and send you messages via these platforms. Sustainable Wellness will interact with you in accordance with the social media platform's rules but we are not responsible for how the platform operators collect and handle your Personal Data. We are not responsible for what third parties post on our social media accounts.

5. Kinds of Information Collected

For the different purposes in the course of conducting Sustainable Wellness 's business, you may be required to provide to Sustainable Wellness your Personal Data, which may include your name, gender, age (or age range), month and date of birth, identity card number (or passport number, where applicable), contact details, e-mail address, residential address, contact number, membership number, marital status, family status, occupation, username and password , log files, interests and favourite activities, (collectively "**Personal Information**"), tracing information about your use of the Application and/or the Website (as the case may be) and transaction information (including your characteristics and transaction behaviour) ("**Progress Data**"), and your WeChat account name ("**Social Media Data**").

Sustainable Wellness may also collect from you and/or third parties, which have been authorised by you, your health data, health records, medical information, history, condition, drug history and/or other relevant information relating to your health, body and/or medical condition ("**Medical Information**"), and retain the same as necessary for performing the Services.

Personal Information, Progress Data, Social Media Data, and Medical Information shall collectively be referred to as "**Personal Data**".

Details of Personal Data to be collected will also be set out in the relevant PICS provided to you on or before collection of such Personal Data.

6. Purposes and Uses of Personal Data Collected

Sustainable Wellness will use your Personal Data for specific purposes identified in the PICS provided to you on or before your Personal Data is collected. This includes sharing your Personal Data with, and your Personal Data being used by, third parties as set out in the PICS for those purposes.

7. Accuracy of Personal Data

You may be requested to provide to Sustainable Wellness certain Personal Data for specific services. If you fail to provide accurate or update Personal Data as requested for each specific service, the provision of such services by Sustainable Wellness may be affected.

8. Retention of Personal Data

Sustainable Wellness will retain your Personal Data for a period no longer than necessary for the fulfillment of the purposes for which they are to be used. If you are a user of Sustainable Wellness services, your Personal Data will be retained for a reasonable period after termination of your or your related member's membership for verification and audit purposes. The above is subject to any applicable legal, statutory, regulatory or accounting requirements.

9. Third Party Websites and/or Mobile Applications

The website(s) and/or mobile application(s) of Sustainable Wellness may from time to time contain linkages to other third party websites and/or mobile applications. These other third party websites and/or mobile applications are independent from the website(s) or mobile application(s) of Sustainable Wellness. Sustainable Wellness has no control or management over the contents of such other websites, mobile applications or their privacy policies or compliance with law. You should be fully aware that the provisions of such links do not constitute an endorsement, approval, or any form of association by or with Sustainable Wellness. Sustainable Wellness has no control over your personal data submitted by you, if any, to other websites and/or mobile applications. This Privacy Policy Statement applies to the website(s) and/or mobile application(s) of Sustainable Wellness. You should read the respective privacy policies of other websites or mobile applications.

10. Service Providers

Sustainable Wellness may provide your Personal Data to our information technology/software solutions/technology services providers, marketing agents, social media, research companies, and service providers of development and maintenance, administrative, data processing, digital storage, or other similar services within or outside of Hong Kong (together, "Third Party Service Providers") in connection with the specific purposes set out in the PICS and paragraph 6 above. In these cases, the Third Party Service Providers are required to use your Personal Data consistent with the agreements Sustainable Wellness enters into with them as well as this Privacy Policy Statement and the PICS.

11. Security of Information

The physical records of your Personal Data will be stored in secured place(s) in Hong Kong with restricted access by us or those who we share your Personal Data with in accordance with this Privacy Policy Statement and the PICS. The electronic records of your Personal Data will be stored in the servers of Sustainable Wellness and/or the relevant Third Party Service Providers as our data processors (whether within or outside Hong Kong) located in secured places and protected by adequate information technology security measures (e.g. encryption for transmission of sensitive data through the internet in appropriate cases), or we will procure by contract, or use our reasonable endeavours, to ensure that those who we share your Personal Data with (whether within or outside Hong Kong) will act in accordance with this Privacy Policy Statement and the PICS and

comply with the requirements of the PDPO of the laws of Hong Kong. Only authorized personnel of Sustainable Wellness (who have been trained to handle your Personal Data properly and bound by a duty of confidentiality) will have access to these records and servers on a "need-to-know" and "need-to-use" basis, or we will procure by contract or use our reasonable endeavours to ensure that those who we share your Personal Data with (whether within or outside Hong Kong) will act in accordance with this Privacy Policy Statement and the PICS and comply with the requirements of the PDPO of the laws of Hong Kong.

Your Personal Data (including Medical Information) may be stored by us in physical location(s) in Hong Kong and/or servers located within or outside Hong Kong. Your Personal Data (excluding Medical Information) may be stored by and shared with AIA International Limited ("**AIA**") and Third Party Service Providers, located within or outside Hong Kong. Your Medical Information shall only be disclosed to AIA upon your consent and strictly for the purpose of underwriting of your insurance policies under AIA. We will take all reasonable measures to ensure that your Personal Data (including Medical Information) is stored and processed securely, regardless of the country or place in which it is stored, and we will procure by contract or use our reasonable endeavours to ensure that AIA and the Third Party Service Providers do the same. Our cross-border transfer of your Personal Data will be conducted in accordance with the PICS and applicable laws for the protection of your Personal Data.

No data transmission over the internet or any other public network can be guaranteed to be completely secure, and privacy cannot be assured in your communications to us. You are encouraged to protect against unauthorized access to your password. You are advised to sign out from your account when finished particularly when using a shared computer.

12. Exclusion

Sustainable Wellness may disclose your Personal Data as required by law, any government departments, regulatory authorities, enforcement agencies and courts of competent jurisdiction. Sustainable Wellness excludes all liability for disclosure of your Personal Data in this manner.

13. Use in Legal Proceedings etc.

If it becomes necessary for Sustainable Wellness to take action against you for recovering from you the debt you owe to Sustainable Wellness, you agree that your Personal Data can be used by Sustainable Wellness in identifying and taking legal action against you.

14. Access and Correction of Information and Withdrawal of Consent

You have the right to request in writing to the Personal Data Privacy Officer of Sustainable Wellness to:

- a. check whether Sustainable Wellness holds any of your Personal Data;
- b. access your Personal Data held by Sustainable Wellness (if any);
- c. require Sustainable Wellness to correct your Personal Data that is inaccurate (if any);
- d. ascertain our policies and practices (from time to time) in relation to Personal Data and the types of Personal Data held by us; and

- e. withdraw your consent to the use of your Personal Data for direct marketing purposes (see below).

All such requests will be handled promptly in accordance with the requirements of the PDPO of the laws of Hong Kong. Sustainable Wellness may charge you a reasonable fee for processing your Personal Data access request.

15. Direct Marketing

We cannot use or provide to third parties (whether intra-group and/or external parties) your Personal Data for direct marketing purposes without your consent. Subject to your consent, we may use or provide to third parties your Personal Data for direct marketing purposes in accordance with the PICS provided to you on or before collection of your Personal Data.

For the avoidance of doubt, we and/or AIA will not use your Medical Information for or in relation to direct marketing of the marketing subjects of Sustainable Wellness and/or the marketing subjects of AIA.

You may withdraw your consent any time by writing to the Personal Data Privacy Officer of Sustainable Wellness at 20th Floor of New World Tower II, 16-18 Queen's Road Central, Hong Kong or by email at privacy@aiaaltawellness.com.hk.

16. Change of Privacy Policy Statement

This Privacy Policy Statement may from time to time be updated, revised and amended. Any update, revision or amendment will be effective immediately upon being posted on website(s) and/or mobile application(s) of Sustainable Wellness. Where legally required, we shall notify you and/or obtain your consent for specific material updates, revision or amendment. If you do not accept the updates, revision or amendment, and/or provide your consent, then we may not be able to provide goods or services to you. You are advised to check the website(s) and/or mobile application(s) of Sustainable Wellness for updates to this Privacy Policy Statement on a regular basis.

17. Change of Control

In the event of any actual or proposed transfer of business, transfer of shares, restructuring, amalgamation, merger, sale, transfer, or purchase of us or our business or our affiliates or our affiliates' businesses, Sustainable Wellness may need to transfer your Personal Data to the new entity in accordance with the PICS. You will be notified of such event and you may decide to withdraw your consent to the use of your Personal Data.

18. Enquiries

If you have any questions or wish to access or correct your Personal Data or withdraw your consent to the use of your Personal Data held by Sustainable Wellness for direct marketing purposes, please contact the Personal Data Privacy Officer of Sustainable Wellness at:

20th Floor of New World Tower II, 16-18 Queen's Road Central, Hong Kong
Attention: Personal Data Privacy Officer
(Marked Confidential, and with the name of Sustainable Wellness)

or by email at privacy@aiaaltawellness.com.hk.

19. Inconsistency or Conflict

If there is any inconsistency or conflict between the English and Chinese versions of this Privacy Policy Statement, the English version shall prevail.

20. PRC Addendum

If you are:

- (i) an individual located in Mainland China who visits Sustainable Wellness's website(s) or uses relevant mobile application(s) of Sustainable Wellness, or otherwise uses Sustainable Wellness's products and/or services by phone or any other means from Mainland China; and/or
- (ii) an individual holding a Mainland China passport and/or resident identity card who visits the physical stores of Sustainable Wellness in Hong Kong or otherwise use Sustainable Wellness's products and/or services by phone or any other means in Hong Kong,

your Personal Data will be processed by Sustainable Wellness in accordance with the "People's Republic of China Addendum" in addition to this Privacy Policy Statement and the PICS, as well as the applicable data protection laws and regulations in Mainland China which, for the current purposes, excludes Hong Kong, the Macau Special Administrative Region of the People's Republic of China and Taiwan.

Sept, 2023