Personal Data Protection Policy

Hubexo Hong Kong Limited together with its subsidiaries, affiliates, related and associated companies (collectively referred to as "**Hubexo**") respects and is committed to the protection of your personal data and your privacy. This Personal Data Protection Policy ("**Policy**") explains how Hubexo collects and handles your personal data in accordance with the Personal Data (Privacy) Ordinance of Hong Kong SAR (Cap. 486) ("Ordinance"). Hubexo requires that all its officers, management, and members of staff comply with the obligations under the Ordinance.

Hubexo may amend this Policy at any time without prior notice and will notify you of any such amendments via our website or by such other means of communication as deemed suitable by Hubexo. The handling of personal data will be governed by the most recent version of the Policy, available at apac.hubexo.com.

(1) Personal Data

1.1 Type of personal data
In this Policy, personal data as defined in the Ordinance, includes any information which relates to you or in respect of a third party and which was collected by or provided to Hubexo for any of the purposes stated in Section 2 below ("**Purposes**").

Your personal data collected for the Purposes may include, but is not limited to, your name, details of your immediate employer, job title, the project you are handling and contact details such as email address, telephone numbers, fax number and business address.

1.2 Source of personal data
Hubexo may collect your personal data from: (i) publicly available sources including your company's website, newspapers, magazines, documents submitted to the regulatory authorities, government publications, online directories, official licensing or registration databases, or (ii) directly from you via telephone calls, email correspondences, or (iii) indirectly through third parties.

1.3 Obligatory personal data
Hubexo will inform you where the personal data is obligatory to be provided by you or if it is strictly on a voluntary basis only. Should you fail to provide the obligatory personal data, we may be unable to process your request and / or provide you with the relevant service and products requested.
All personal data provided to researchers in the course of researching and reporting on construction projects is done so voluntarily. There is no obligation to provide project related information.

(2) Purposes of collecting and further processing (including disclosing) your personal data

Your personal data is collected and further processed by Hubexo as required or permitted by law and to give effect to the following transactions:

☐ to include your personal data into our database of projects and that of their participating consultants, contractors and other related organisations by limited access through subscription;

☐ to provide project leads and construction industry intelligence to our clients through their purchase of our products and services;

☐ to manage and improve the quality of our products and / or services offered;

☐ to comply with Hubexo's legal and regulatory obligations;

☐ for internal investigations, compliance, audit or security purposes including without limitation crime detection, prevention and prosecution;

☐ to conduct research for internal marketing analysis and analysis of customer patterns and choices;

☐ to better manage our business and your relationship with Hubexo;

☐ to ensure that the contents on our website are presented in the most effective manner for you and for your computer and / or device;

☐ for Hubexo's internal records management; or

☐ for any other purpose that is required by any laws, regulations and guidelines including the requirements of any governmental or regulatory authorities.

(3) Protection measures

Hubexo may securely store your personal data in different ways, including in hard copy and electronic form. Generally, personal data is maintained on a secure database located in Singapore.

Hubexo takes such steps as are reasonable in the circumstances to protect your personal data from risks such as misuse, interference and loss, and from unauthorised or accidental access, modification, disclosure or other use. These steps include:

- training and reminding our staff of their obligations with regard to your personal data;
- using software which encrypts personal data (where a lock symbol appears on the browser window);
- utilising passwords, firewalls and virus scanning tools, and protection in buildings where personal data is stored, to prevent against unauthorised access to our systems; and
- restricting staff and volunteers that have access to the databases that store user personal data and to personal files.

Where we no longer require your personal data, Hubexo will take reasonable steps to destroy it.

(4) Accuracy of personal data

Hubexo takes certain measures to ensure that the personal data is reasonably accurate, complete and is relevant to the Purposes. However, Hubexo also relies on you to promptly inform us in writing of any errors or changes in the personal data.

(5) Retention of personal data

Hubexo's policy is to retain personal data for no longer than is necessary for the fulfilment of the Purposes (or any directly related purpose) unless the personal data is also retained to satisfy any applicable statutory or contractual obligations. Different retention periods apply to the various kinds of personal data collected and held by Hubexo.

(6) Disclosure or transfer of personal data (within or outside of Hong Kong SAR)

6.1 Entities within Hubexo
Your personal data may be processed by us and / or other entities (within or outside of Hong Kong SAR) within the Hubexo group of companies (including related companies, subsidiaries, holding companies, associated companies.).

Hubexo will ensure that:
☐ access to your personal data is restricted to employees who are reasonably required to process your personal data only in accordance with their assigned duties; and
☐ only necessary information will be released to the relevant employees.

6.2 Classes of third parties
Your personal data may be disclosed or transferred to relevant third parties (within or outside of Hong Kong SAR) as required under law, pursuant to relevant contractual relationships (for example, where we appoint a third party service provider) or for the Purposes above.

In the event of a potential, proposed or actual sale/disposal of business or interest, acquisition, merger, re-organisation or funding exercise relating to any member of Hubexo ("**Transaction**"), your personal data may be required to be disclosed or transferred to a third party as a result of the Transaction. You hereby acknowledge that such disclosure and transfer may occur and permit Hubexo to release your personal data to such third parties and their advisers/representatives.

Your personal data may be disclosed to the following classes of third parties:
☐ to our clients who purchase our products and / or services in order to contact you, on behalf of your company, in relation to its business;
☐ law enforcement agencies including courts, tribunals or authorities, whether governmental or quasi-governmental having jurisdictions over Hubexo;
☐ relevant governmental agencies, statutory authorities, industry regulators and local councils; and

any persons, authorities or regulators to whom Hubexo is permitted or required to disclose to under the laws of any country.

(7) Websites

7.1 Links to other sites
Contents of Hubexo's website may include links to third party websites. Hubexo is not responsible for the contents on such linked third party websites and users should observe the separate privacy policies applicable to the respective third party websites.

7.2 Cookies
Hubexo may collect unidentifiable information about your visits to Hubexo's website without your active submission of information.

Unidentifiable information may be collected using various technologies, such as cookies and web beacons. Cookies are small text files that are transferred to your computer's hard disk by a website. Web beacons (also referred to as GIF files, pixels or Internet tags) help Hubexo recognise a unique cookie on your browser. Your internet browser automatically transmits some of this unidentifiable information to Hubexo such as the URL of the website you have visited and the version of the browser in which your computer is operating.

Passive information collection technologies can make your use of Hubexo's website easier by allowing Hubexo to provide better service, customise the Hubexo's website based on consumer preferences, compile statistics, analyse trends and otherwise administer and improve Hubexo's websites. Certain features of Hubexo's website may not work without the usage of the passive information collection technologies. Information collected by these technologies cannot be used to identify you without additional identifiable information and Hubexo will not collect such additional identifiable information through the usage of such tracking technologies.

(8) Right to access and correct personal data

You have the right to access and correct your personal data held by us, subject always to certain exemptions. We will make every endeavour to ensure your personal data is accurate and up-to-date and therefore we ask that if there are any changes to your information, you should notify us directly at the contact details set out in Section (9) below.

(9) Limiting the processing of personal data, further enquiries and complaints

If:
(i) you would like to access or correct your personal data;

(ii) you would like to obtain further information on how to limit the processing of your personal data;

(iii) you have any further query; or

(iv) you would like to make a complaint in respect of your personal data,

you may contact:

Data Privacy Officer

Email address: privacy.hk@hubexo.com.

Hubexo will take reasonable steps to verify your identity before giving access or making corrections to your personal data in order to protect your privacy and identity.

Updated: September 2025 – Company name updated only.