

Privacy policy in accordance with the European General Data Protection Regulation (GDPR) for the website <https://www.sti-group-apac.com/>

Name and address of the controller

STI Asia Pacific Ltd.

Unit 3322, 33/F

Hing Wai Centre

No.7 Tin Wan Praya Road

Aberdeen, Hong Kong

Hong Kong

Phone: +852 2327 9232

is the controller within the meaning of the EU General Data Protection Regulation (GDPR) and other national data protection laws.

General information on data processing

Scope of personal data processing

We only collect and use personal data from users of our website to the extent necessary to provide a functional website, our content and services.

As a matter of principle, the collection and use of our users' personal data only takes place with their consent. An exception to this principle applies in cases where the processing of data is permitted by law or where it is not possible to obtain prior consent for practical reasons.

Legal basis for the processing of personal data

The legal basis for the processing of personal data is generally derived from:

Art. 6 (1) (a) GDPR when obtaining the consent of the data subject.

Art. 6 (1) (b) GDPR for processing that serves to fulfil a contract to which the data subject is a party. This also includes processing operations that are necessary for the implementation of pre-contractual measures.

Art. 6 (1) (c) GDPR for processing that is necessary to fulfil a legal obligation.

Art. 6 (1) (d) GDPR if the processing of personal data is necessary to protect the vital interests of the data subject or another natural person.

Art. 6 (1) (f) GDPR, if processing is necessary to safeguard a legitimate interest of our company or a third party and the interests, fundamental rights and freedoms of the data subject do not override the former interest.

In order to be able to base the processing of personal data on a legitimate interest, a review is carried out for each relevant process in consultation with the data protection officer, whereby the following three conditions must be met:

- 1) The controller or a third party has a legitimate interest in the data processing.
- 2) The processing is necessary to safeguard the legitimate interest.
- 3) The interests or fundamental rights and freedoms of the data subject requiring the protection of personal data do not override this interest.

Data deletion and storage period

Users' personal data will be deleted or blocked as soon as the purpose of storage no longer applies. Further storage may take place if this has been provided for by the European or national legislator in Union regulations, laws or other provisions to which the controller is subject.

The data will also be blocked or deleted if a storage period prescribed by the aforementioned standards expires, unless there is a need for further storage of the data for the conclusion or fulfilment of a contract.

Use of our website, general information

Description and scope of data processing

Each time our website is accessed, our system automatically collects data and information from the user's computer system.

The following information may be collected:

Information about the browser type and version used, the user's operating system, the user's Internet service provider, the user's IP address, the date and time of access, websites from which the user's system accesses our website, websites accessed by the user's system via our website

The data described is stored in our system's log files. This data is not stored together with other personal data of the user.

Purpose and legal basis for data processing

The temporary storage of the IP address by our system is necessary to enable the website to be delivered to the user's computer. For this purpose, the user's IP address must remain stored for the duration of the session.

Storage in log files is carried out to ensure the functionality of the website. In addition, the data is used to optimise the website and to ensure the security of our information technology systems. The data is not evaluated for marketing purposes in this context.

The legal basis for the temporary storage of data and log files is Art. 6 para. 1 sentence 1 lit. f GDPR.

The collection of your personal data for the provision of our website and the storage of the data in log files is essential for the operation of the website. The user therefore has no option to object.

Duration of storage

Your data will be deleted as soon as it is no longer necessary for the purpose for which it was collected. If your data is collected to ensure the provision of the website, the data will be deleted when the respective session is ended.

If your data is stored in log files, it will be deleted after seven days at the latest.

Storage beyond this is possible, in which case the IP addresses of users will be deleted or anonymised. It will then no longer be possible to assign the calling client.

General information on the use of cookies

We use cookies on our website. Cookies are text files that are stored in the internet browser or by the internet browser on the user's computer system.

When you visit a website, a cookie may be stored on your operating system. This contains a characteristic string of characters that enables the browser to be uniquely identified when the website is visited again.

We use cookies to make our homepage more user-friendly. Some elements of our website require that the browser can be identified even after a page change.

TDDDG:

The legal basis for the storage of cookies, device identifiers and similar tracking technologies, or for the storage of information in the end user's terminal equipment and access to this information, is the European ePrivacy Directive in conjunction with the German Telecommunications Digital Services Data Protection Act (TDDDG).

Please note that the legal basis for the processing of personal data collected in this context is then derived from the GDPR (Art. 6 (1) sentence 1 GDPR). The legal basis for the processing of personal data relevant in each specific case can be found below for the respective cookie or the respective processing itself.

The primary legal basis for storing information on the end user's terminal equipment – in particular for storing cookies – is your consent, Section 25 (1) sentence 1 TDDDG. Consent is given when you visit our website – although this is of course not mandatory – and can be revoked at any time in the cookie settings.

According to Section 25 (2) No. 2 TDDDG, consent is not required if the storage of information in the end user's terminal equipment or access to information already stored in the end user's terminal equipment is absolutely necessary for the provider of a telemedia service to be able to provide a telemedia service expressly requested by the user.

The cookie settings indicate which cookies are classified as strictly necessary (often referred to as 'technically necessary cookies') and therefore fall under the exemption of Section 25 (2) TDDDG and do not require consent.

GDPR:

When cookies are used, the following data is stored and transmitted:

Log-in information

The legal basis for the processing of personal data using cookies is Art. 6 para. 1 sentence 1 lit. f GDPR. The purpose of using technically necessary cookies is to simplify the use of our website.

We would like to point out that individual functions of our website can only be offered with the use of cookies.

These are the following applications:

Remembering search terms

We do not use user data collected by technically necessary cookies to create user profiles.

Cookies are stored on the user's computer and transmitted to our site. As a user, you therefore have control over the use of cookies. You can restrict or deactivate the transmission of cookies by making changes to your internet browser settings. Stored cookies can also be deleted there. Please note that you may not be able to use all the functions of our website if you deactivate cookies.

The legal basis for the processing of personal data using cookies for analysis and advertising purposes is Art. 6 (1) (a) GDPR, provided that the user has given their consent.

Cookie consent with Cookie Yes

This website uses the WordPress plugin Cookie Yes (CookieYes Limited of 3 Warren Yard Warren Park, Wolverton Mill, Milton Keynes, MK12 5NW, United Kingdom), which sets a technically necessary cookie to enable you to customise your cookie settings and document them in accordance with data protection regulations. When you visit our website, no data is transmitted to Cookie Yes.

Cookie consent technology is used to obtain the legally required consent for the use of cookies. The legal basis for this is Art. 6 para. 1 sentence 1 lit. c GDPR.

The Cookie Yes cookie stores the consent you gave when you entered the website. If you wish to revoke this consent, simply delete the cookie in your browser. When you re-enter/reload the website, you will be asked again for your cookie consent.

You can change your cookie settings at any time by clicking on the cookie icon in the lower left corner of our website.

Your rights / rights of the data subject

Right to information

You have the right to obtain information from us as the controller as to whether and which personal data concerning you is processed by us, as well as further information in accordance with the legal requirements under Articles 13 and 14 of the GDPR.

You can assert your right to information at:

service.hk@sti-group.com

Right to rectification

If the personal data we process concerning you is incorrect or incomplete, you have the right to have it corrected and/or completed. The correction will be made immediately.

Right to restriction

You have the right to restrict the processing of personal data concerning you in accordance with the legal provisions (Art. 18 GDPR).

Right to erasure

If the reasons set out in Art. 17 GDPR apply, you may request that the personal data concerning you be erased without delay.

Please note that the right to erasure does not apply if the processing is necessary for one of the exceptions listed in Art. 17(3).

Right to be informed

If you have exercised your right to rectification, erasure or restriction of processing, we are obliged to notify all recipients to whom your personal data has been disclosed of this rectification or erasure of the data or restriction of processing, unless this proves impossible or involves disproportionate effort. You also have the right to be informed about these recipients.

Right to data portability

Under the GDPR, you also have the right to receive the personal data concerning you that you have provided to us in a structured, commonly used and machine-readable format or to request that it be transferred to another controller.

Right to revoke your declaration of consent under data protection law

You have the right to revoke your declaration of consent under data protection law at any time. We would like to point out that revoking your consent does not affect the legality of the processing carried out on the basis of your consent until revocation.

Right to object

Furthermore, you have the right to object at any time, on grounds relating to your particular situation, to the processing of personal data concerning you which is carried out on the basis of Article 6(1)(e) or (f) GDPR.

Automated decision-making in individual cases, including profiling

Under the EU General Data Protection Regulation, you also have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

Right to lodge a complaint with a supervisory authority

If you believe that the processing of your personal data violates the GDPR, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, your place of work or the place of the alleged infringement.

Data transfer outside the EU

The GDPR ensures a high level of data protection within the European Union. When selecting our service providers, we therefore rely on European partners wherever possible if your personal data is to be processed. Only in exceptional cases will we have data processed outside the European Union in the context of using third-party services. We only allow your data to be processed in a third country if the specific requirements of Art. 45 GDPR are met. This means that the processing of your data may then only take place on the basis of special guarantees, such as the official recognition by the EU Commission of a level of data protection equivalent to that of the EU or the observance of officially recognised special contractual obligations, the so-called 'standard data protection clauses'.

EU-US Trans-Atlantic Data Privacy Framework

Within the framework of the so-called 'Data Privacy Framework' (DPF), the EU Commission has also recognised the level of data protection for certain companies from the USA as secure within the framework of the adequacy decision of 10 July 2023. The list of certified companies and further information on the DPF can be found on the website of the US Department of Commerce at <https://www.dataprivacyframework.gov/s/participant-search> (in English).

Data processing under the Swiss DSG

In principle, the use of our website is subject to the legal provisions of the GDPR. If you also visit our website from Switzerland and if the associated data processing also affects you as a Swiss citizen, the present data protection provisions apply to you in the same way as the GDPR under the Swiss Federal Act on Data Protection ('Swiss DSG' in the version of 1 September 2023).

The Swiss DSG does not generally provide for the specification of a legal basis. In this respect, we only process your data from Switzerland if the processing is lawful, carried out in good faith and is proportionate in accordance with Art. 6 (1) and (2) of the Swiss DSG. Furthermore, we only collect your data for specific purposes that are recognisable to the data subject and only process it in a manner that is compatible with these purposes in accordance with Art. 6 (3) of the Swiss DSG.

In this context, please also note that although certain terms are worded differently under the GDPR, they have the same legal meaning as under the Swiss FADP. For example, the GDPR terms 'processing' of 'personal data' and 'legitimate interest' and 'special categories of data' used in this privacy policy correspond to the terms "processing" of 'personal data', 'overriding interest' and 'particularly sensitive personal data' used in the Swiss DSG.

The rights of data subjects set out here in accordance with Art. 12 ff. GDPR can also be asserted by data subjects from Switzerland in accordance with the provisions of Art. 25 ff. Swiss DSG.

Minors under the age of 16

Minors under the age of 16 are expressly not the target audience of our website and the offers on this website. We would like to point out that parents or guardians must supervise their children's online activities. Minors under the age of 16 should not transmit any personal data to us without the consent of their parents or guardians. We explicitly do not request any personal data from minors under the age of 16, do not knowingly collect such data and do not pass it on to third parties.

Newsletter

Newsletters are managed by the STI Group headquarters. For further information on data protection, please refer to the respective privacy policy at <https://www.sti-group.com/data-protection-and-privacy-policy.html>.

Electronic contact

If you would like to contact us, a contact form is available on our homepage, which you can use to contact us electronically. The data entered in the input mask will be transmitted to us and stored. This data includes:

Full name, email address, company name, message

When the message is sent, the following data is also stored:

The user's IP address, date and time of contact

It is also possible to contact us via the email address provided. In this case, the user's personal data transmitted with the email will be stored.

Your data will not be passed on to third parties in this context; the data will be used exclusively for processing the communication.

The legal basis for processing the contact request and its handling is regularly Art. 6 (1) (b) GDPR.

If further personal data is processed during the sending process, this is only to prevent misuse of the contact form and to ensure the security of our information technology systems.

Your data will be deleted as soon as it is no longer necessary for the purpose for which it was collected. For personal data from the input mask of the contact form and those sent by email, this is the case when the respective conversation with the user has ended. The conversation is ended when it can be inferred from the circumstances that the matter in question has been conclusively clarified.

The additional personal data collected during the sending process will be deleted after a period of seven days at the latest.

Google Tag Manager

This website uses Google Tag Manager. Google Tag Manager is a solution that allows marketers to manage website tags via an interface. The tool itself (which implements the tags) does not use cookies and, for technical reasons, only collects your IP address. The tool triggers other tags, which in turn may set cookies and collect data. Google Tag Manager does not access this data. If deactivation has been carried out at domain or cookie level, this remains in place for all tracking tags implemented with Google Tag Manager.

If we have obtained your consent, the legal basis for the use of Google Tag Manager is Art. 6 para. 1 sentence 1 lit. a GDPR. Otherwise, the legal basis for the use of the technically necessary cookie arises from our legitimate interest pursuant to Art. 6 para. 1 sentence 1 lit. f GDPR.

Further information can be found in the provider's terms of use at: <https://www.google.com/intl/de/tagmanager/use-policy.html>

Content Delivery Networks (CDN)

This site uses so-called content delivery networks to provide popular online libraries and web fonts. Access is then made directly to the operators' servers, so that data such as the calling IP address, referrer, browser information, etc. is collected there.

The legal basis for this is our legitimate interests pursuant to Art. 6 para. 1 sentence 1 lit. f GDPR in presenting our site in a needs-based manner and optimising the user experience.

You can prevent the collection and processing of your data by CDNs by deactivating the execution of script code in your browser or installing a script blocker in your browser (you can find one at www.noscript.net, for example).

Below is a list of the CDNs used:

Amazon Cloudfront

We use the Amazon CloudFront content delivery network (CDN) from Amazon Web Services EMEA SARL, 38 avenue John F. Kennedy, L-1855 Luxembourg (AWS) to increase the security and delivery speed of our website. This is in line with our legitimate interest (Art. 6 para. 1 lit. f GDPR). A CDN is a network of servers distributed [worldwide] that is capable of delivering optimised content to website users. For this purpose, personal data may be processed in AWS server log files.

AWS is the recipient of your personal data and acts as a processor for us.

The functionality of the website cannot be guaranteed without this processing.

Your personal data will be stored by AWS for as long as is necessary for the purposes described.

Further information on options for objection and removal vis-à-vis AWS can be found at: https://d1.awsstatic.com/legal/privacypolicy/AWS_Privacy_Notice_German_Translation.pdf

AWS has implemented compliance measures for international data transfers. These apply to all global activities in which AWS processes personal data of natural persons in the EU. These measures are based on the EU Standard Contractual Clauses (SCCs). Further information can be found at: https://d1.awsstatic.com/legal/aws-gdpr/AWS_GDPR_DPA.pdf

Digital Ocean CDN

This website uses a cloud platform for virtual servers from Digital Ocean LLC, 106 6th Avenue, New York, USA.

Digital Ocean has implemented compliance measures for international data transfers. These apply to all global activities in which AWS processes personal data of natural persons in the EU. These measures are based on the EU Standard Contractual Clauses (SCCs). For more information, please visit: <https://www.digitalocean.com/legal/privacy-policy/>.

Cloudflare

In order to offer you secure data transmission via SSL encryption on our website and to protect our website against malicious, mass (DDoS) or other attacks that would disrupt or prevent the operation of the website, we use the services of Cloudflare, Inc. 101 Townsend St San Francisco, CA 94107.

We have concluded a corresponding agreement with Cloudflare for order processing on the basis of the GDPR.

As part of the protection of this website, Cloudflare uses a script and possibly a cookie in your browser. This cookie is used to validate access and to detect malicious access attempts. Cloudflare collects statistical data about visits to this website. The access data includes:

Name of the website accessed, file, date and time of access, amount of data transferred, notification of successful access, browser type and version, the user's operating system, referrer URL (the previously visited page), IP address and the requesting provider.

Cloudflare uses the log data for statistical evaluations for the purpose of operating, securing and optimising the website. Please also read Cloudflare's privacy policy, which is available here: <https://www.cloudflare.com/privacypolicy/>.

The legal basis for the use of Cloudflare is our legitimate interest pursuant to Art. 6 (1) (f) GDPR, which consists of the purposes described above.

Your data will be deleted as soon as it is no longer necessary for the purpose for which it was collected.

You can prevent the collection, forwarding and processing of this data by deactivating the execution of script code in your browser, installing a script blocker in your browser (you can find one at www.noscript.net, for example) or activating the 'Do Not Track' setting in your browser.

Web analytics

Google Analytics 4

This website uses Google Analytics 4, a web analytics service provided by Google Ireland Limited, Google Building Gordon House, 4 Barrow St, Dublin, D04 E5W5, Ireland ('Google').

The use of Google Analytics 4 enables us to use a wide range of applications. We operate Google Analytics 4 using the following technologies:

Please adjust accordingly:

- Cookies
- Scripts

This stores and retrieves information on your computer, which enables us to analyse your use of the website. The information generated about your use of this website is usually transferred to a Google server in the USA and stored there. Your IP address is anonymised by default before being transferred to us and Google. The full IP address is transferred to a Google server in the USA, but is truncated there immediately. According to Google, the IP address transmitted by your browser as part of Google Analytics is not merged with other Google data. The legal basis for the use of Google Analytics is your consent in accordance with Art. 6 (1) (a) GDPR.

During your visit to the website, your user behaviour is recorded in the form of 'events'. Events can include:

- Page views
- First visit to the website
- Start of the session
- Your 'click path', interaction with the website
- Scrolls (whenever a user scrolls to the bottom of the page (90%))
- Clicks on external links
- Internal search queries
- Interaction with videos
- File downloads
- Advertisements viewed/clicked

- Language setting

The following may also be recorded:

- Your approximate location (region)
- Your IP address (in abbreviated form)
- Technical information about your browser and the devices you use (e.g. language setting, screen resolution)
- Your internet service provider
- The referrer URL

(via which website/advertising medium you came to this website)

On behalf of the operator of this website, Google will use this information to evaluate your use of the website, to compile reports on website activity and to provide other services related to website activity and internet usage to the website operator.

Optional:

We use the User ID function. With the help of the user ID, we can assign a unique, permanent ID to one or more sessions (and the activities within these sessions) and analyse user behaviour across devices.

Optional:

We use Google Signals. This collects additional information in Google Analytics about users who have enabled personalised ads (interests and demographic data, such as your gender or interests) and ads can be delivered to these users in cross-device remarketing campaigns.

Optional:

To better understand user behaviour, Google Analytics 4 uses machine learning. These algorithms help to close data gaps that arise, for example, due to tracking errors.

Optional:

They also serve as the basis for predictive metrics, which use historical data to predict user behaviour in the future as accurately as possible. These predictions can be used, for example, to forecast the likelihood of user churn or purchases and sales.

The recipients of the data may be:

- Google Ireland Limited, Google Building Gordon House, 4 Barrow St, Dublin, D04 E5W5, Ireland (as a processor pursuant to Art. 28 GDPR)

- Google LLC, 1600 Amphitheatre Parkway Mountain View, CA 94043, USA
- Alphabet Inc., 1600 Amphitheatre Parkway Mountain View, CA 94043, USA

We use Google Analytics to analyse and regularly improve the use of our website. The statistics obtained enable us to improve our offering and make it more interesting for you as a user. The legal basis for the use of Google Analytics is your consent in accordance with Art. 6 (1) (a) GDPR.

We store your data for a period of

Please adjust (2 months or as short a period as possible would be recommended):

2–14 months

Information from the third-party provider: Google Dublin, Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland, Fax: +353 (1) 436 1001.

Terms of use: <https://marketingplatform.google.com/about/analytics/terms/de/>, overview of data protection: <https://policies.google.com/?hl=de>, and the privacy policy: <http://www.google.de/intl/de/policies/privacy>.

Social media presence

The STI Group's head office operates social media accounts on various platforms. Please refer to the privacy policy at <https://www.sti-group.com/data-protection-and-privacy-policy.html>.