

PERSONAL DATA PROCESSING POLICY

Revised on October 1, 2025

1. Terms and definitions

1.1. Website — Internet page located at <https://www.wannabe.one/>

1.2. User — a legally capable individual who has independently accepted the Terms and Conditions and uses the Website.

1.3. Terms and Conditions — terms and conditions for the provision of services by WNBL LIMITED (hereinafter referred to as the “Operator”), posted on the Internet at <https://www.wannabe.one/>

1.4. Personal data/Data — any information relating directly or indirectly to a living natural person, allowing that person to be identified, and which is at the disposal of the Operator, including data that the User provides independently, as well as data collected automatically when using the Website (e.g., IP address, cookies, device identifiers, browser and operating system information, date and time of access, etc.), in accordance with the Personal Data (Privacy) Ordinance (Cap. 486, Laws of Hong Kong).

2. General provisions

2.1. The purpose of this Policy is to ensure adequate protection of information about Users, including their Personal Data, from unauthorized access and disclosure. This Policy covers the methods used by the Operator when processing data, including the collection, use, disclosure, transfer, and storage of information obtained about Users.

2.2. The User agrees to the terms of the Policy from the moment the User actually starts using the Website's services. By accepting the terms of the Policy and Terms and Conditions, the User gives their voluntary and unconditional consent to the processing of their Personal Data under the terms of this Policy. If the User does not agree with these terms, they must refrain from using the Website's services. The User has the right to withdraw their consent at any time; withdrawal does not affect the legality of processing prior to withdrawal.

2.3. The Policy may be changed by the Operator as necessary to protect the Data, provide current information, and respond to legal and technical changes, unilaterally at any time, without prior notice to the User, by publishing the current version of the Policy on the Site. The User undertakes to independently monitor changes to the Policy and familiarize themselves with its terms and conditions. If the User does not notify the Operator in writing within 7 (seven) days of the publication of the new version of the Policy that such version is unacceptable to the User, this means that the User agrees to the terms and conditions of the new version of the Policy. To obtain earlier versions of the Policy, the User has the right to contact the Operator. The current version of the Policy is published by the Operator at <https://www.wannabe.one/>

2.4. This Policy applies only to the Website. The Operator does not control and is not responsible for third-party websites that the User may access via links available on the Website.

2.5. The legal basis for the processing of personal data is a set of legal acts, in accordance with which the Operator processes personal data.

The legal grounds for the processing of Users' personal data include:

- Personal Data (Privacy) Ordinance (Cap. 486, Laws of Hong Kong). Data processing is carried out in accordance with the Data Protection Principles (DPP1–DPP6), including requirements for collection, accuracy, use, storage, security, and Users' rights to access and correct data. The basis for processing is also the User's consent given in accordance with this Policy.

3. Third-party services

3.1. The Operator may use analytics software to better understand the functionality of the Website. This software may record information such as how often the User uses the Website and events that occur on the Website.

3.2. The Site may contain third-party tracking tools, as well as other resources from other service providers acting on behalf of the Operator. The provisions of the Policy do not apply to the use of third-party tracking tools, as the Operator has no access to or control over these third parties (e.g., Google Analytics, Stripe, PayPal).

4. Purposes of data processing

4.1. The Operator processes Personal Data to fulfill the Operator's obligations to Users regarding the use of the Site's services or the execution of agreements and contracts with the User.

4.2. The Operator may use Personal Data for the following purposes:

a) Research and analytics. To analyze how the User interacts with the Site; to monitor and analyze usage and activity trends; for other research, analytical, and statistical purposes based on anonymized Data.

b) Legal compliance. To comply with applicable Hong Kong legal or regulatory obligations, including the Personal Data (Privacy) Ordinance (Cap. 486), to respond to official requests from Hong Kong regulatory authorities and courts; to comply with anti-money laundering obligations (Anti-Money Laundering and Counter-Terrorist Financing Ordinance); to provide information about the User to tax authorities at the request of the User or at the request of tax authorities in accordance with the law.

c) Marketing and communication. To communicate with Users, including by email and on social media; respond to User inquiries; provide Users with news and newsletters, special offers, promotions, and other information that may be of interest to Users; and for other informational, marketing, or promotional purposes.

d) Processing service requests. To provide services to Users.

e) Collecting and publishing User reviews on the Website. To collect feedback from Users about services and provide Users with information about services.

5. Data processing

5.1. For the purposes of this Policy, Data processing by the Operator means any action (operation) or set of actions (operations) performed with or without the use of automation tools on Data, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (provision, access), depersonalization, blocking, deletion, and destruction of Data.

5.2. The Operator processes the following Personal Data under the specified conditions:

5.2.1. For research and analytics purposes, as specified in clause 4.2 of the Policy, The User consents to the processing of cookies, since the use of the Website is conditioned by the use of cookie technology by creating cookies on the User's device for the purpose of monitoring the use of the Website, collecting non-personal information about Users, saving preferences and other information on the User's device for the convenience of using the Website.

The User also consents to the transfer of cookies to third parties specified in clause 3.2. of the Policy.

If the User does not agree to the Operator using this type of file, the User must set the appropriate settings in their Internet browser or stop using the Website. The User is hereby notified and understands that disabling the cookies used by the Website may affect the use of the Website, including limiting it (partially or completely).

5.2.2. For legal compliance purposes, as specified in clause 4.2 of the Policy, the Operator provides information, including Personal Data, to law enforcement, tax, or other authorities upon official request, in cases where the Operator has sufficient reason to believe that the response must be provided under the laws of that country and does not contradict international standards. If necessary and at the request of the User, their personal data may be transferred to tax authorities for tax deductions and other benefits in accordance with the law. The Operator shall only transfer personal data that is necessary to fulfill the tax request, in accordance with applicable law.

5.2.3. For marketing and communication purposes, as specified in clause 4.2 of the Policy, the User gives the Operator consent to process the email address, phone number, and social media username provided by them. The User provides the specified Data to the Operator using the functionality of the Website.

5.2.4. For the purposes of processing a request for services, as specified in clause 4.2 of the Policy, the User gives consent to the Operator to process the full name, city of residence, email address, phone number, and username on social networks provided by them. The User provides the specified Data using the functionality of the Website.

5.2.5. For the purpose of collecting and publishing User reviews on the Website, as specified in clause 4.2. of the Policy, the User gives consent to the Operator to process and publish the review provided by them, as well as their full name.

5.2.6. The operator does not collect or process special categories of personal data relating to the race, nationality, political views, religious or philosophical beliefs, health, or intimate life of Users.

5.3. The Operator will process Personal Data only for as long as necessary for the purposes for which it was collected, in connection with the User's use of the Site, except where the Operator has a legitimate interest or obligation to store such Data for a longer period, or where the Data is necessary to establish, exercise, or defend legal claims. In all other cases, upon achieving the purposes of processing Personal Data, the Operator undertakes to cease processing Personal Data and to destroy or anonymize Personal Data. The confidentiality regime with respect to Data is lifted in the event of its anonymization, as well as in other cases provided for by applicable law.

5.4. The User understands and agrees that the email address, phone number, and social network username provided by them during registration may be used by the Operator to send the User informational and/or advertising messages and/or make phone

calls to convey advertising and informational messages. The User gives the Operator their consent to receive such messages and phone calls from both the Operator and its authorized representatives. The Operator will not transfer this data to third parties, except for those persons who are described in detail in this Policy. To opt out of receiving informational and/or advertising messages and phone calls, the User may use the "Unsubscribe" button in such messages sent by email or contact the Operator directly with a request using the contact details specified in the Policy.

5.5. The Operator may also process other User data that the User independently decides to provide when contacting the Operator by phone and/or by sending an email to the Operator's email address.

6. User rights

6.1. The User has the right to withdraw their consent, on the basis of which the Operator processes Personal Data, at any time, but this does not affect the lawful processing of Data by the Operator on the basis of the User's consent prior to such withdrawal. If the Site receives a notification from the User about the withdrawal of consent to the processing of personal data, it shall stop processing the User's personal data within a period not exceeding 40 days from the date of receipt. Notification of withdrawal of consent to the processing of personal data shall be sent to the email address specified in clause 8.2 of the Policy.

6.1.1. For Users who are residents of the European Union.

A. Legal basis for the processing of Personal Data. The Operator's legal basis for the collection, use, and exchange of Personal Data will depend on the purpose for which the Operator uses the Personal Data. As a rule, the Operator will rely on the following legal grounds for processing Data:

- (i) the User's consent;
- (ii) if the processing is in the legitimate interests of the Operator; or
- (iii) when processing is necessary to perform services in accordance with the Terms and Conditions between the Operator and the User (for example, to make the Website available to the User). If the Operator relies on the User's consent to process Personal Data, the User has the right to withdraw their consent at any time.

B. Transfer of Personal Data outside the EU. Since the Operator's third-party services referred to in clause 3.2 of the Policy are located in countries outside the European Union, Personal Data may be transferred to other countries that may not provide the same level of data protection as the laws of the User's country of residence for the purpose of providing services in accordance with the Terms and Conditions. The Operator applies appropriate measures to protect Personal Data, as described in this Policy. C. How to file a complaint. If the User believes that their rights have been violated, the User may file a complaint with the supervisory authority of the User's country of residence.

If the User has questions about the exercise of any of their rights, they may contact the Operator using the contact details provided in the Policy.

6.2. The User has the following rights:

- a) Right to object. The User has the right to object to the processing of Personal Data that is processed on the basis of legitimate interests. The User may also refuse further collection of Personal Data at any time by not visiting the Website.
- b) Right of access. The User has the right to know what information the Operator stores about them. If the User wishes to exercise this right, they have the right to contact the Operator, specifying what information the User would like to receive. The Operator has the right not to provide all the requested information, for example, in cases where such information includes the personal data of another person. If the Operator cannot provide the User with the requested information, the Operator will explain the reason for the refusal to the User.
- c) Right to correct Personal Data. The Operator maintains the accuracy and timeliness of information about Users, but if the User has reason to believe that any information about him/her is incorrect, the User has the right to notify the Operator, and the Operator will correct such information.
- d) Deletion of Data. The User has the right to request the deletion of his/her Personal Data from the Operator's database. The Operator will delete the Personal Data of such a User in accordance with the request after verifying the User's identity. The Operator has the right to retain Personal Data or part thereof, for example, to fulfill legal obligations and to protect or enforce legal rights. The Operator also has the right to store information about the User in anonymous form.
- e) Data portability. In some cases, the User has the right to request that the Operator provide the transferred Personal Data so that the User can transfer the relevant information to another data controller.
- e) Restriction on data processing. In some cases, the User has the right to request a restriction on the processing of Personal Data.
- f) Right to lodge a complaint. The User has the right to lodge a complaint against the Operator. To do so, the User has the right to contact the relevant supervisory authority in their country of residence, provided that they notify the Operator 40 days prior to the date of filing such a complaint with the supervisory authorities and in the absence of feedback and/or a decision on the User's complaint within the specified period.

6.3. To exercise the rights provided for in the previous paragraph of the Policy, the User has the right to send a request in free form to the Operator using the contact details specified in the Policy. The processing time for the User's request is 40 days from the date of receipt of the request and, if necessary, verification of the User's identity. The Operator reserves the right to ask the User to provide additional information to confirm the User's identity before proceeding with the processing of the request sent by them.

6.4. All correspondence received by the Operator from Users (requests in writing or submitted electronically) is considered restricted information and will not be disclosed without the User's consent. Personal data and other information about the User

who sent the request may not be used without the User's express consent in any way other than to respond to the issue described in the request received, or in cases expressly provided for by law.

7. Measures to protect personal data

7.1. The Operator takes technical, organizational, and legal measures to protect Users' personal data from unauthorized or accidental access, destruction, modification, blocking, copying, distribution, and other illegal actions.

7.2. The Operator has implemented commercially reasonable technical, physical, managerial, and organizational measures designed to protect any User information from accidental loss and from unauthorized access, use, alteration, or disclosure. However, the Operator cannot absolutely guarantee that unauthorized third parties will never be able to use, disclose, or modify Users' personal information for improper purposes.

7.3. If the Operator becomes aware of a compromise of Personal Data as a result of a security breach, the Operator will immediately notify those individuals whose Data has been compromised. The Operator maintains a written Data Breach Response Plan, which includes: immediate isolation of the incident, internal investigation of the causes, assessment of the scope and nature of the compromised data, and assessment of the risk of harm to data subjects.

If the assessment determines that the breach poses a real risk of significant harm to the individuals affected, the Operator will notify the Office of the Privacy Commissioner for Personal Data (PCPD) and the affected data subjects as soon as possible, indicating the nature of the breach, the measures taken, and recommendations for mitigating the risk. The Operator will document all steps, investigation results, and corrective measures.

8. Operator details

8.1. WNBL LIMITED

UNIT 2A, 17/F, GLENEALY TOWER, NO.1 GLENEALY, CENTRAL, HONG KONG S.A.R.

business registration number 78513770

8.2. If the User has any requests, questions, or concerns regarding the use of the Policy, including questions related to the exercise of any rights or obligations, the User may contact the Operator at wnbl.law@gmail.com. When contacting us, please include your name and contact details for feedback.