

## 私隱政策聲明和個人資料收集聲明

### A. 私隱政策聲明

#### 1. 目的

鑑於保護個人資料的重要性，以確保遵守適用法律，包括《個人資料（私隱）條例》（以下簡稱“《私隱條例》”）以及其中包含的保障資料原則，萊札譜香港有限公司（以下簡稱“本公司”）及其附屬公司（以下統稱“本集團”），特此制定本私隱政策聲明和個人資料收集聲明以保障用戶的個人資料。本文件包括兩個部分，第一部分為私隱政策聲明，作為我們處理個人資料的私隱政策和實踐的概括性說明，而第二部分為個人資料收集聲明，該聲明是我們按照《私隱條例》在向您作為資料當事人收集個人資料時或之前須向您提供的。

本私隱政策聲明和個人資料收集聲明的條款構成顧客或其他個別人士已經或可能與本集團簽訂的條款及細則及/或協議或安排的一部分。如有任何不一致之處，應以本文件的條款為準。

請仔細閱讀本私隱政策聲明和個人資料收集聲明。通過訪問本公司的網站（以下簡稱“網站”）及/或使用通過網站提供給您的產品和服務，即表示您同意本私隱政策聲明和個人資料收集聲明適用於我們掌握的與您相關的所有資料，並且在法律允許的最大範圍內，任何關於個人資料收集的爭議都將受到本私隱政策聲明和個人資料收集聲明的約束。

#### 2. 正確收集和使用個人資料

本集團將以合法和公平的方式收集個人資料。本集團從用戶收集的個人資料將僅在必要範圍內用於實現指定的使用目的，並將採取措施防止超出指定目的的使用。在從個人（《私隱條例》下的資料當事人）收集資料之前和之後，我們將明確告知他/她：

- (a) 收集資料的目的以及該資料可能被轉移至的人士類別；
- (b) 是否有必須或可自願提供該資料，以及（若他必須提供該資料）不提供該資料便會承受的後果；
- (c) 他/她有權要求查閱和更正我們所持有的資料；以及
- (d) 負責處理資料查閱和更正請求的人員。

#### 3. 禁止向第三方披露和提供個人資料及/或用於其他目的

本集團將妥善管理從用戶獲取的個人資料，並且未經您的同意，不會向第三方提供或披露您的個人資料，除非在適用法律和法規要求的情況下。

除非獲資料當事人同意，否則我們將不會將他/她的個人數據用於原先收集目的外的任何其他目的。只有在按照《私隱條例》獲得資料當事人同意的情況下，我們才會將資料當事人的個人資料用於直接促銷。資料當事人隨時可以撤回對個人資料用於直接促銷的同意。

如果本集團委聘外部服務提供者或資料處理者（無論在香港境內還是境外）以協助其處理個人資料，與任何合作方進行涉及個人資料收集的活動，或在其各種身份下與本集團相關的機構分享其收集的個

人資料，所有這些提供者、處理者、參與方和機構須根據合約條款或其他方法以遵守與本集團自身適用的相同標準以防止任何損失、未獲准許的查閱、使用、修改、披露或保留。

#### 4. 個人資料的準確性和保留期間

本集團將採取一切合理步驟以確保收集和保留的用戶個人資料為實現使用目的所需的範圍內是準確和最新的。個人資料將根據我們現行的政策保留，並其保留期間不會超出為實現收集目的或資料當事人已經同意的時間，除非是為了履行法律義務或有充分的理由。

#### 5. 保安措施

本集團將採取一切合理地必要、可行和恰當的保安措施，以防止未獲批准或意外的查閱、泄露、丟失、損失及/或個人資料的錯誤使用。在極少數發生上述問題的情況下，我們將迅速實施糾正措施，並努力將損害降至最低。此外，本公司將為員工提供必要和適當的教育和內部指導，以確保對個人資料的安全管理。

互聯網不是安全的通信形式，向本集團通過互聯網發送任何個人資料的資料當事人接受此類通信所涉及的風險，包括未獲批准的第三方查閱或干預的風險。通過互聯網傳輸的信息可能會跨國傳輸（即使發送方和接收方位於同一國家），當中通過的國家的私隱和資料保護法可能比資料當事人所居住的國家的法律更弱。

#### 6. 遵守法律和法規

本集團將遵守當地的法律和法規（包括《私隱條例》），並參考相關當局不時發佈的指引載列的最佳實踐。此外，我們將建立並遵守相關的個人資料保護政策。

#### 7. 持續改進

本集團定期審查、審核和調整個人資料保護措施的實施，以實現持續改進。

#### 8. 通常可以提供的信息

我們通常能夠應您的要求提供以下與我們收集和處理的個人資料相關的信息：

- (1) 所持有的個人資料種類；
- (2) 使用個人資料的主要目的；
- (3) 我們在處理此類個人資料方面的政策和實踐。

#### 9. 查閱個人資料和更正資料請求

資料當事人有權通過書面信函至我們的個人資料（私隱）主任，地址為香港九龍尖沙咀東部麼地道 77 號華懋金座 10 樓 1019 室，[或通過發送電子郵件至 chocozaphk@chocozap24.com](mailto:chocozaphk@chocozap24.com)，提交有關查閱其個人資料的書面要求。我們將就每項查閱資料要求收取費用。我們一般能在資料當事人提交查閱要求後的[40]個工作日內告知其結果；如果拒絕要求，我們將提供理由。

資料當事人亦有權利以書面信函至我們的個人數據（私隱）主任，地址為香港九龍尖沙咀東部麼地道 77 號華懋金座 10 樓 1019 室，[或通過發送電子郵件至 chocozaphk@chocozap24.com](mailto:chocozaphk@chocozap24.com)，要求免費更正其不準確的個人資料。

## 10. 修訂

本集團會不時檢閱本集團的私隱政策聲明、以下本集團的個人資料收集聲明及/或其他本集團的個人資料保護政策。這些文件的最新版本將發佈在本公司網站 <https://chocozap-hk.com>。

## 11. 第三方的權益

儘管《合約（第三者權利）條例》（第 623 章）以及/或任何司法管轄區中任何類似的法律之存在，本私隱政策聲明和個人資料收集聲明是個人的且僅為了您和我們雙方利益而制訂，並且不構成或賦予任何第三方任何權利，也不應視作為賦予任何第三方任何利益。明確排除《合約（第三者權利）條例》（第 623 章），以及/或任何司法管轄區中任何類似的法律的條款賦予或給予第三方權利強制執行本私隱政策聲明和個人資料收集聲明的任何條款的應用，並且本私隱政策聲明和個人資料收集聲明的任何條款不是或不應視作為允許由非本文件締約方的執行。各方終止、撤銷或就與本私隱政策聲明和個人資料收集聲明有關的任何修改、豁免、變更或解決達成協議的權利不受制於任何第三方的同意。

## 12. 查詢

如果對本集團的私隱政策聲明或以下本集團的個人資料收集聲明有任何疑問，或涉及本集團處理個人資料的任何問題，請以書面信函方式與我們的個人數據（私隱）主任聯繫，地址為香港九龍尖沙咀東部麼地道 77 號華懋廣場 10 樓 1019 室，[或通過發送電子郵件至 chocozaphk@chocozap24.com](mailto:chocozaphk@chocozap24.com)。

# B. 個人資料收集聲明

## 1. 簡介

本個人資料收集聲明（“PICS”）主要說明：(a) 我們從您或由本集團持有關於您作為資料當事人收集的個人資料的類型；(b) 收集個人資料的目的；和(c) 可能將這些個人資料轉移至的人士類別。

在收集您的個人資料之前，我們將向您或您已授權代表您提供個人資料的一方以電子、網頁連結或印刷本方式提供私隱政策聲明和本個人資料私隱政策聲明（PICS）單一文檔的副本。本 PICS 適用於您不時向本集團提供的個人資料，本集團將就此類 PICS 作出的任何後續修訂刊登於本公司網站 <https://chocozap-hk.com> 上，或由本集團向您作出另行通知。

我們從您處收集個人資料時，將通過本 PICS 或本集團任何員工告知，您是否有必須或可自願提供個人資料。如果提供資料為必須的，您將被告知不提供此類資料則承受的後果。

如果您未滿 18 歲，您應當諮詢您的父母或對您負有作為父母親的責任的人士，以確保在向我們提供您的個人資料之前，您瞭解私隱政策聲明和本 PICS 的內容和含義。

如果您向我們提供關於他人的個人資料，您向我們聲明並保證已獲得該等他人的所有必要同意，以允許我們按照本文所述使用該等個人資料。

本 PICS 中的任何內容均不應限制《個人資料（私隱）條例》下資料當事人的權利。

我們深知保護您的個人資料的重要性，並感謝您對我們尊重私隱的信任，我們會以謹慎而合理的方式來保護您的私隱。

## 2. 收集的個人資料類型

- (1) 您的姓名、出生日期、職業、住址/通訊地址、電子郵件、手機電話號碼、家庭電話號碼、辦公電話號碼、首選聯繫方式和時間、緊急聯繫人姓名、緊急聯繫人的聯繫方式、性別、婚姻狀況、身份證號碼或護照號碼、您的身份證明文件副本和個人照片；
- (2) 您的信用卡/借記卡詳情及/或其他支付方式的詳情；
- (3) 您來訪或到場記錄和使用本公司設備、設施和裝置的記錄；
- (4) 您的購買歷史、以往和未來交易記錄；
- (5) 你的訂閱電子報記錄；
- (6) 你的運動和健康記錄、偏好、計劃和目標；
- (7) 與本集團建立客戶關係的年份；
- (8) 您首次瞭解本集團產品的方式；
- (9) 您與我們的通訊（包括但不限於通過我們的網站、應用程序或電子郵件的通訊，以及對本公司作出評論和諮詢的內容和記錄）；
- (10) 您使用我們的網站、應用程序和服務的其他信息，包括電腦和連接信息、頁面瀏覽統計數據、網站和應用程序的流量情況、廣告數據、IP 地址和標準網絡日誌信息；
- (11) 您在本集團場所內或周邊的閉路電視（“CCTV”）監控系統捕捉的靜態或動態圖像或影片；
- (12) 您的體溫及/或通過我們的具有熱力監測設備的閉路電視攝像頭及/或其他熱力監測設備捕捉的圖像。

當您使用本網站時，我們還可能要求您提供上述個人資料，包括當您自願向我們註冊或更新您的現有個人資料、訂閱商品目錄或電子報、給我們發送電子郵件、使用我們的客戶服務、回答問卷、參加促銷活動、在我們的社交網絡留言板上發帖或進行其他提交至本網站時。

### 3. 收集您個人資料的目的

以下是本公司收集資料當事人個人資料的目的

- (1) 接受和處理您對本公司商品和服務的請求或訂單；
- (2) 管理向個人用戶和企業用戶提供本集團商品和服務；
- (3) 處理、接收、調查和回覆用戶的意見、投訴和查詢；
- (4) 管理申請、創建、操作和管理客戶賬戶和記錄，並在本公司營運的系統和應用程序中註冊個人資料並使用 ID 和密碼登錄所需的服務；
- (5) 識別和驗證本公司客戶的身份；
- (6) 通知資料當事人有關規則變更及與新產品和服務相關的信息，例如基於用戶興趣和關注的定向廣告。
- (7) 通過各種通知方式，如電子郵件、基於用戶興趣和關注的定向廣告，以及其他與本公司推薦其他公司的產品和服務相關的信息，以及其他業務介紹等提供通知；
- (8) 統計用戶使用本集團產品和服務的數據，以促進和改善產品和服務的質量；
- (9) 基於用戶興趣和關注進行行為定向促銷的分析和統計數據製作，以及本集團實施的其他促銷、推廣、銷售、產品和服務規劃；
- (10) 管理和維護本公司的網站，並在必要時進行故障診斷；
- (11) 進行與本公司交易相關的信用判斷、中間信貸安排和債務管理；
- (12) 為了改進本公司的服務質量，正確把握用戶意見、諮詢內容和合同內容；
- (13) 處理賬單和付款；
- (14) 開展本公司受其他經營者委託的其他業務；
- (15) 促銷目的（包括在本集團的公共渠道，如網站和應用程序上發佈用戶對本集團產品和服務的使用相關的匿名統計數據），以及客戶滿意度調查；
- (16) 追蹤和分析您的購買、交易、消費模式、賬戶活動和支付記錄；
- (17) 提供有關本公司和我們的產品的信息，例如電子報、活動、促銷或競賽；
- (18) 就通過閉路電視監控系統捕捉的個人資料而言，於便監控本集團場所的日常營運，並確保特定場所所有用戶的安全和保障，預防、發現及/或減少犯罪，並進行分析和調查，包括調查法律索賠和指控以及與健康和安全的相關事項；
- (19) 就通過熱力監測設備捕捉的個人資料而言，監測該場所人員的體溫，以保護該場所用戶和本集團員工的健康，並監測和就選定的具有熱力監測設備的閉路電視攝像頭和熱力監測設備操作作出相關的必要調查；
- (20) 遵守適用的法律要求；以及
- (21) 與上述相關目的。

請注意：

(i) 本集團的求職者和員工可以參考有關求職者和員工的特定個人資料收集聲明，瞭解本集團在收集其個人資料方面的實踐。

(ii) 為了提高本公司內部電話接待服務的質量並準確掌握詢問內容，本公司可能記錄用戶電話通話的內容。

(iii) 就上述第（12）款中規定促銷目的，本集團不會公開或披露以下企業客戶的個人（自然人）用戶的資料：姓名、性別、年齡、地址、香港身份證號碼、任何其他個人標識符、對其使用本公司產品和服務的具體信息以及個人歷史。

## 直接促銷

在您通過參與機制給予同意的情況下，本集團可能使用您的個人資料發送您可能認為與您相關的直接促銷/推廣材料，包括但不限於我們新產品和服務的促銷、電子報、限時優惠、合約續訂和其他服務、更新或促銷。在此過程中，請注意：

(1) 本公司不時持有的資料當事人的姓名、聯繫方式、購買的產品和服務、交易模式和行為以及人口統計數據可能被本公司用於直接促銷；

(2) 可能進行促銷的服務、產品和主題的類別包括：(i) 本集團的產品和服務；以及 (ii) 與本集團的產品和服務相關的獎勵、忠誠或特權計劃；以及

(3) 除了促銷上述服務、產品和事宜外，本集團還打算向第三方獎勵、忠誠、合作品牌或特權計劃提供者提供資料當事人的上述數據，以便它們用於促銷這些服務、產品和事宜，並且就目的，本集團需取得資料當事人的書面同意（其中包括不反對的表示）。

根據法律要求，我們需給予您權利選擇不接收這些通訊。因此，您將有機會通過上述參與機制表示您的同意或拒絕接收此類通訊。請注意，如果您決定不接收這些通訊，您可能會錯過與我們的產品和服務相關的重要信息，或者影響您作為我們集團客戶體驗的利益或優惠。

如果您在選擇參與後不希望本公司使用或向其他人提供您的資料用於如上所述的直接促銷，您可以行使您的選擇退出權利，向本公司提供書面通知，地址為香港九龍尖沙咀東部麼地道 77 號華懋廣場 10 樓 1019 室，或發送電子郵件至 [chocozap@chocozap24.com](mailto:chocozap@chocozap24.com)。

## 4. 向第三方披露、轉移和提供個人資料

本公司一般不會向外部人士提供或披露本公司持有的資料當事人的個人資料，但受制於適用法律法規的規定，可能會向以下各方及/或在以下各種情況提供個人資料：

(1) 對本集團負有保密責任並有責任保持個人資料機密的任何方；

(2) 任何員工、代理人、獨立承包商、合資夥伴、服務提供商或其他第三方，為上述目的以及任何附屬目的所必須，包括為本集團提供香港或其他地方的行政、審計、數據處理、文件管理、技術、電信、存儲、付款、保安、緊急、獎勵、忠誠、合作品牌和特權計劃或其他服務（包括直接促銷服務）而對本集團承擔保密責任；

(3) 與我們共同提供服務或其他合作機會的組織及/或機構；

(4) 本集團的控股公司及/或股東，或由其控制或擁有的任何人或實體（每個為“**關聯公司**”），為用於上述目的和任何此類附屬目的而必須並對集團承擔保密責任；

(5) 我們的專業顧問，如律師、稅務顧問、會計師和審計師；

(6) 本集團或關聯公司根據適用於本集團或關聯公司的任何法律或法規的要求，或者根據任何法律、監管、政府、稅務、執法或其他主管機構，或者本集團或關聯公司需遵守的自我監管或行業組織或協會給予或發佈的任何指引或指導，或者根據本集團或關聯公司與境內或境外法律、監管、政府、稅務、

執法或其他主管機構，或者自我監管或行業組織或協會的合約或其他承諾的要求而進行披露；所有這些可能涉及在香港境內或境外，並且可能目前存在或將來存在；

- (7) 與資料當事人就本集團的任何產品或服務提出的或針對資料當事人提出的任何索賠有關的任何人；
- (8) 我們權利或業務的任何實際或潛在受轉讓人、受移交人、參與方或子參與方；
- (9) 已經獲得了資料當事人的同意；以及
- (10) 為了保護該資料當事人的身體或心理健康和福利。

如果涉嫌欺詐或違反有關披露、轉移和向第三方提供個人資料的情況，我們將立即採取一切適當的措施對此類風險進行調查和解決。

通過網站或其他方式向我們提供個人資料，您明確授權我們如上所述使用和披露您的資料。如果您不同意，請不要繼續操作。

## 5. 個人資料的查閱和披露、更正、暫停使用等

當資料當事人要求本集團披露、更正、暫停使用等其所持有的個人資料時，本集團在確認請求者身份並經本集團評估確實持有相關個人資料後，將在合理的時間限制內遵從此類請求，但可能會收取處理費。

然而，如果：

- (1) 請求者未提供足夠信息以確認其身份；
- (2) 未能在不披露第三方個人資料的情況下滿足請求；以及
- (3) 遵從請求暫時受到所有適用法律法規的禁止，

本集團可能會拒絕遵從此類資料查閱請求。

如果涉及本公司個人資料的查閱、處理、更正和披露事宜以及投訴和諮詢等問題，您可通過電子郵件聯繫我們的個人資料（隱私）主任，郵箱為 [chocozaphk@chocozap24.com](mailto:chocozaphk@chocozap24.com)，或寫信至香港九龍尖沙咀東部麼地道 77 號華懋廣場 10 樓 1019 室。

## 6. 外部網站連結

本公司網站可能包含指向外部網站的連結。本公司將盡力保護用戶個人資料，但外部網站對個人資料的處理不在本公司責任範圍內。如對外部網站有任何評論或疑問，請聯繫運營該外部網站的公司。

## 7. 安全措施

我們採取合理的步驟，確保我們收集的個人資料免受未獲准許的查閱、披露、濫用或丟失。除非法律另有規定或允許，我們只會在您知情並同意的情況下收集、使用或披露您的個人資料。

我們已實施與資料敏感性相適應的安全防護措施，包括使用物理和電子安全措施。物理安全措施包括限制進入設施以及妥善處理個人資料。就電子安全措施而言，網站採用 SSL（安全套接層）安全系統來保護用戶的個人資料。用戶輸入的姓名、地址和電話號碼等個人資料在發送和接收時會被 SSL 自動加密，以防止外部第三方截取用戶的個人資料。

本公司使用由防火牆安全系統保護的專用服務器來管理個人資料，並盡最大努力防止未獲准許的查閱和資料泄露。

如果本集團與另一第三方機構簽訂合約代表其提供服務，本集團將確保它們採取適當的安全措施，並僅根據本集團被授權的範圍內處理您的資料。這些機構無權將您的個人資料用於其自身目的。本集團將採取合理的步驟檢查這些機構，以確保它們符合本集團認為可接受的安全要求。

## 8. 瀏覽歷史信息及其他相關信息的處理

### (I) 瀏覽歷史信息及其他相關信息的收集

當您訪問本公司的網站時，本公司可能會從您的設備或系統收集以下信息（以下簡稱為“**瀏覽歷史和相關信息**”），以幫助區分您與我們產品和服務的其他用戶，並在您使用我們的產品和服務時為您提供定製體驗，並幫助我們改進我們的服務。

- 識別終端的信息（cookie 信息和其他個體識別號）
- 用戶的使用環境（IP 地址、操作系統和瀏覽器信息等）
- 用戶在公司網站上的瀏覽記錄，包括訪問流量和時間
- 位置信息

本公司可能通過 cookie 和其他工具收集瀏覽歷史和相關信息。Cookie 是包含少量信息的小型文本文件，可下載並存儲在您的任何互聯網設備上。我們還可能使用 Web Beacon 等其他技術，這是一種包含唯一標識符的小型圖形文件，允許我們檢查您是否已訪問特定內容。對於此類聲明，所有這些技術都將被視為“cookie”。您可以通過更改瀏覽器的設定關閉或刪除 cookie。由於這些設定在不同的瀏覽器和瀏覽器擴展中有所不同，我們無法保證網站在所有情況下都能正常運行。請注意，您可能需要清除瀏覽器的 cookie、站點數據和緩存的 web 內容（包括離線內容），然後重新啟動瀏覽器才能使更改生效。但是，如果您關閉或刪除 cookie，我們則可能無法有效提供服務，因此建議您在瀏覽器上允許 cookie。如果您在未刪除或拒絕某些或所有 cookie 的情況下使用我們的網站，則表示您同意我們可以將那些您未刪除或拒絕的 cookie 放置在您的設備上。

瀏覽歷史和相關信息不會與其他信息結合以追蹤/分析用戶的檔案。我們僅在所需功能使用期間保留瀏覽歷史和相關信息。

### (II) 瀏覽歷史和相關信息的使用目的

瀏覽歷史和相關信息的使用目的如下：-

- 確認在需要登錄的服務中是否為同一用戶的訪問
- 在一定時間後提醒用戶重新輸入 ID 和密碼，以確保安全
- 為用戶提供最適合他們的關於本公司及我們的商業合作伙伴各種服務的內容、廣告和信息
- 記錄您對我們網站的使用以及對我們網站和其他社交媒體平台上發佈的在線廣告的反應，以向您提供個性化內容，包括與您興趣相關的廣告
- 豐富和改進本公司及我們的商業合作伙伴提供的服務和廣告內容，或進行分析和探索新的服務
- 顯示適合用戶使用的佈局和信息
- 防範和檢測欺詐行為

### (III) 使用第三方數據處理服務進行行為定向廣告

本公司可能按照以下設置，直接或間接地將用戶的瀏覽歷史和相關信息傳輸給第三方數據處理器，以基於用戶的興趣和關注提供行為定向廣告。如果您希望我們停止向第三方發送瀏覽歷史和相關信息，請參閱下文的“選擇退出行為定向廣告”。



#### (IV) 選擇退出行為定向廣告

本公司可能會與下文列出的第三方合作，允許下列第三方代表我們對我們網站的某些部分的使用和活動進行研究。這些第三方可能使用追蹤標籤和 Cookie 等技術來進行此類研究。這些第三方通過這些技術收集的資料可能用於更深入地瞭解我們的用戶，包括訪問者數量、其行為和使用模式，以便進行更準確的報告並提高我們促銷的效果。這些第三方還可能利用此類技術來了解您在我們網站上交互的內容，以便隨後向您發送一些定向廣告。您應查閱此類第三方自己的 Cookie 和隱私政策，以獲取有關他們如何使用您的資料的信息，並且這些政策中還包含了退出其使用和進一步處理您資料的說明。選擇退出不會移除您訪問頁面上的廣告，而是會導致您看到的這些廣告不再與您的興趣相匹配。這意味着您看到的這些廣告將不再與由這些具體 Cookie 捕捉的第三方資料處理器的興趣相匹配。

CMerTV, Inc.

<https://www.cmertv.co.jp/cookie>

Criteo

<https://www.criteo.com/jp/privacy/>

CA, Inc.

<https://www.ca.com/jp/legal/privacy.html>

Facebook

<https://www.facebook.com/about/privacy>

Google, Inc.

<https://policies.google.com/privacy>

<https://adssettings.google.com/authenticated>

LINE

[https://terms.line.me/line\\_rules\\_optimize?lang=ja](https://terms.line.me/line_rules_optimize?lang=ja)

NewsTV

<https://newstv.co.jp/privacy/>

Outbrain

<https://www.outbrain.com/legal/privacy#privacy-policy>

Sizmek

<https://www.sizmek.com/privacy-policy/>

<https://www.sizmek.com/privacy-policy/#options>

SmartNews

<https://www.smartnews.com/privacy/#jp>

<http://www.smartnews-ads.com/optout/>

Taboola, Inc

<https://www.taboola.com/taboola-隱私政策>

Twitter, Inc.

<https://twitter.com/ja/privacy>

Yahoo Japan Corporation

<https://btoptout.yahoo.co.jp/optout/preferences.html>

<https://accounts.yahoo.co.jp/privacy/>

So-net Media Networks Co., Ltd.

<http://www.so-netmedia.jp/privacypolicy/>

[http://www.so-netmedia.jp/cookie/dsp\\_optout.html](http://www.so-netmedia.jp/cookie/dsp_optout.html)

Rakuten Group, Inc.

<https://grp12.ias.rakuten.co.jp/optout/>

AMoAd

<http://www.amoad.com/guideline/#optout>

所有這些連結都是屬本集團外部的第三方，因此本集團對這些連結的內容不負責任。

注意：私隱政策聲明和個人資料收集聲明中文譯本僅供參考。文義如有歧異概以英文版本為準。

萊札譜香港有限公司香港九龍尖沙咀東部麼地道 77 號華懋金座 10 樓 1019 室

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## **Privacy Policy Statement and Personal Information Collection Statement**

### **A. Privacy Policy Statement**

#### **1. Purpose**

In view of the importance of protection of personal data and to ensure compliance with the requirements of the applicable laws including the Personal Data (Privacy) Ordinance (the “**PDPO**”) and the data protection principles as contained therein, RIZAP HONG KONG LIMITED (hereinafter referred to as the “**Company**”) and its subsidiaries (collectively hereinafter referred to as the “**Group**”) have devised this Privacy Policy Statement and Personal Information Collection Statement to safeguard users’ personal data. This document comprises two parts, Part A being the Privacy Policy Statement, as a general statement on our privacy policies and practices in relation to the personal data we handle, and Part B being the Personal Information Collection Statement, which is provided to you in accordance with the PDPO when or before we collect personal data from you as a Data Subject.

The provisions of this Privacy Policy Statement and Personal Information Collection Statement form part of the terms and conditions and /or the agreement or arrangements that a customer or other individual has entered or may enter into with the Group. If any inconsistency is found, the provisions of this document shall prevail.

Please read this Privacy Policy Statement and Personal Information Collection Statement carefully. By visiting the Company’s website (the “**Website**”) and/or using the products and services made available to you through the Website, you are agreeing to this Privacy Policy Statement and Personal Information Collection Statement which shall apply to all information that we have about you, and that, to the maximum extent permitted by law, any dispute over personal information collection shall be subject to this Privacy Policy Statement and Personal Information Collection Statement.

#### **2. Proper collection and use of personal data**

The Group will collect personal data by lawful and fair means. Personal data collected from users will be used only to the extent necessary to achieve the specified purpose of use, and measures will be taken to prevent use beyond the specified purpose. Upon and before collection of data from an individual (“**Data Subject**” under the PDPO), we will explicitly inform him/her:

- (a) the purpose(s) for which the data is to be collected and the groups of persons to whom the data may be transferred;
- (b) whether it is obligatory or voluntary to supply the data, and the consequences of not supplying obligatory data;

(c) his/her right to request access to and correction of data held by us; and

(d) the person responsible for handling data access and correction requests.

### 3. Prohibition of disclosure and provision of personal data to third parties and/or for other purpose

The Group will appropriately manage personal data obtained from users and will not provide or disclose it to third parties without your consent, except in cases as required under applicable laws and regulations.

Unless a Data Subject consents, we will not use his/her personal data for any purpose other than the purpose for which the data was originally collected. We will only use a Data Subject's personal data for direct marketing purposes if he/she has consented to do so in accordance with the PDPO. Any consent for use of personal data in direct marketing may be withdrawn by the Data Subject at any time.

If the Group engages outsourcing service providers or data processors (whether within or outside Hong Kong) to assist in its handling of personal data, partners with any parties in activities that involve collection of personal data, or shares the personal data it collects with bodies related to the Group in its various identities, all these providers, processors, parties and bodies are required to adhere to the same standards as applied to itself by the Group to prevent any loss, unauthorised access, use, modification, disclosure or retention, either by contractual provisions or other means.

### 4. Accuracy and duration of retention of personal data

The Group takes all reasonable steps to ensure that the user's personal data collected and retained is accurate and up-to-date to the extent necessary to achieve the purpose of use. Personal data will be retained in accordance with our prevailing policies and no longer than is necessary for the fulfilment of the purposes for which it is collected or to which the Data Subject has given consent, except for the purposes of fulfilling legal obligations or with subsisting reasons.

### 5. Security measures

The Group will take all reasonably necessary, practicable and appropriate security measures to prevent unauthorized or accidental access, leakage, loss, damage and/or misuse of personal data. In the unlikely event that any of the aforesaid problem occurs, we will promptly implement corrective measures while striving to minimize the damage.

In addition, the Company will provide the necessary and appropriate education and internal guidance to employees and supervision in order to ensure the safe management of personal data.

The internet is not a secure form of communication, and a Data Subject who sends any personal data to the Group over the internet accepts the risks that such communication, involves, including the risk of access or interference by unauthorised third parties. Information passing over the internet may be transmitted internationally (even when the sender and recipient are located in the same country) via countries with weaker privacy and data protection laws than a Data Subject's country of residence.

### 6. Compliance with laws and regulations

The Group will comply with the local laws and regulations (including the PDPO) and to take into account the best practices as stipulated in guidelines issued by the relevant local authorities from time to time. In addition, we will establish and comply with the relevant policies for the protection of personal data.

## 7. Continuous improvement

The Group periodically reviews, audits, and adjusts the implementation of personal data protection measures to achieve continuous improvement.

## 8. Information to be generally available

We will generally be able to provide upon request the following information in relation to personal data collected and processed by us:

- (1) the kinds of personal data held;
- (2) the main purposes for which personal data is used; and
- (3) our policies and practices in relation to the handling of such personal data.

## 9. Access to personal data and data correction requests

Data Subjects have the right to request access to their personal data held by us by writing to our Personal Data (Privacy) Officer at Room 1019, 10/F, Chinachem Golden Plaza, 77 Mody Road, Tsim Sha Tsui East, Kowloon, Hong Kong or by email at [chocozaphk@chocozap24.com](mailto:chocozaphk@chocozap24.com). We will charge a fee for processing each data access request. We will generally be able to inform the Data Subject of the outcome within [40] business days of his/her submission of the access request and will give a reason if the request is refused.

A Data Subject also has the right to request correction of his/her personal data that is inaccurate at no charge by writing to our Personal Data (Privacy) Officer in writing to Room 1019, 10/F, Chinachem Golden Plaza, 77 Mody Road, Tsim Sha Tsui East, Kowloon, Hong Kong or by email at [chocozaphk@chocozap24.com](mailto:chocozaphk@chocozap24.com).

## 10. Amendment

The Group's Privacy Policy Statement, the following Group's PICS and/or other Group's personal data protection policy are subject to review from time to time. The latest versions of these documents will be posted on the Company's website at <https://chocozap-hk.com>.

## 11. Rights of Third Parties

Notwithstanding the Contracts (Rights of Third Parties) Ordinance (Cap. 623), and/or any comparable law in any jurisdiction, this Privacy Policy Statement and Personal Information Collection Statement is personal to and is made solely for the benefit of you and us, and shall not create or give any rights to, or purport to confer any benefits on any third parties whatsoever. The application of the Contracts (Rights of Third Parties) Ordinance (Cap. 623), and/or any comparable law in any jurisdiction, giving to or conferring on third parties, the right to enforce any term of this Privacy Policy Statement and Personal Information Collection Statement, is expressly excluded, and no term of this Privacy Policy Statement and Personal Information Collection Statement is, or is intended to be, enforceable by any person not being a party to it. The rights of the parties to terminate, rescind, or agree any amendment, waiver, variation or settlement under or relating to this Privacy Policy Statement and Personal Information Collection Statement, are not subject to the consent of any third party.

## 12. Enquiries

If there is any query concerning this Group's Privacy Policy Statement, the following Group's Personal Information Collection Statement or any issues relating to the handling of personal data by the Group, please contact our Personal Data (Privacy) Officer in writing to Room 1019, 10/F, Chinachem Golden Plaza, 77 Mody Road, Tsim Sha Tsui East, Kowloon, Hong Kong or by email at [chocozaphk@chocozap24.com](mailto:chocozaphk@chocozap24.com).

## **B. Personal Information Collection Statement**

### **1. Introduction**

This Personal Information Collection Statement (“**PICS**”) mainly sets out: (a) the kind of personal data collected from you or held by the Group about you as a Data Subject; (b) the purposes for which personal data is collected; and (c) the classes of persons to whom such personal data may be transferred.

When or before obtaining your personal data, we will provide to you or the party to whom you have authorised to provide your personal data on your behalf, a copy of the Privacy Policy Statement and this PICS in a single document, either electronically, by way of a webpage link or in a printed copy. This PICS applies to personal data provided by you to the Group from time to time, subject to any subsequent revision of such PICS which will be posted on the Company's website at <https://chocozap-hk.com> and/or otherwise informed to you by the Group.

Through this PICS or any staff of the Group, you will be informed whether it is obligatory or voluntary for you to provide the personal data when we seek to collect the data from you. If provision is obligatory, you will be informed of the consequences for you if you do not supply such data.

If you are under the age of 18, you shall consult your parents or such person(s) having parental responsibility for you on the contents of the Privacy Policy Statement and this PICS, so as to ensure that you understand their contents and implication before providing your personal data to us.

If you provide us with personal data about another person, you represent and warrant to us that you have obtained all necessary consents from that other person to permit us to use that personal data as set forth herein.

Nothing in this PICS shall limit the rights of Data Subjects under the Personal Data (Privacy) Ordinance.

We understand the importance of protecting your personal data, and appreciate your confidence that we will respect privacy in a careful and sensible manner.

### **2. Type of personal data collected**

- (1) Your name, date of birth, occupation, residential and/or correspondence address, email, mobile phone number, home phone number, office phone number, preferred contact method and time, name of emergency contact, contact details of such emergency contact, gender, marital status, identity card or passport number, copy of your identification document, and profile photo;
- (2) Your credit/debit card details and/or other payment method details;
- (3) Your attendance or visit records and usage records of the Company's equipment, facilities and devices;
- (4) Your purchase history, previous and future transaction records;
- (5) Your subscription records to e-newsletters,
- (6) Your workout and health history, preferences, plans and goals;
- (7) Year of commencement of customer relationship with the Group;
- (8) The method of how you first learn of the Group's offerings;

- (9) Correspondence with us (including but not limited to those via our website, application or emails, and content and records of comments and inquiries about the Company);
- (10) Other information from your usage of our websites, applications and services, including computer and connection information, statistics on page views, traffic to and from our website and applications, advertisement data, IP address and standard web log information;
- (11) Static or moving images or footages of you captured via our close circuit television (“CCTV”) surveillance system located across or within the vicinity of the premises of the Group; and
- (12) Your body temperature and/or your image captured via our CCTV cameras with thermal monitoring devices and/or other thermal monitoring devices.

We may also ask you to provide aforesaid personal data above when you use the Website, including when you voluntarily register or update your existing profile with us, subscribe to catalogues or newsletters, email us, use our customer services, answer surveys, enter promotional opportunities, post on our social networks’ message boards, or make any other submissions to our Website.

### **3. Purpose for which your personal data is collected**

The Company uses Data Subject’s personal data for the following purposes:

- (1) To accept and process your requests or orders for the Company’s goods and services;
- (2) Administration of provision of the Group’s goods and services to individual users and corporate users;
- (3) To handle, receive, investigate and respond to users’ comments, complaints and enquiries;
- (4) To manage services necessary for application, creation, operation and administration of accounts and records for customers and registering personal data and logging in with ID and password in systems and applications operated by the Company;
- (5) To identify and verify the identity of Company’s customers;
- (6) To notify Data Subjects of changes in the rules and information related to new products and services, such as targeted advertisements based on users’ interests and concerns;
- (7) To provide notifications through various notification methods such as e-mail, targeted advertisements based on users’ interests and concerns, and other information related to the products and services of other companies recommended by the Company, as well as introductions to other businesses, etc.;
- (8) To compile users’ statistics in relation to the use of the Group’s products and services with a view to promote and improve the quality of the same;
- (9) To analyze and produce statistical data for behavior-targeted marketing based on users’ interests and concerns and other marketing, promotion, sales, and product and service planning implemented by the Group;
- (10) To administer and maintain the Company’s website and diagnosing problems where necessary;

- (11) To make credit judgments, intermediate credit facilities, and debt management related to transactions with the Company;
- (12) To correctly grasp the opinions of users, the content of consultations, and the content of contracts in order to improve the quality of the Company's services;
- (13) To process billing and payment;
- (14) To carry out other business when the Company is so entrusted by other business operators;
- (15) Marketing purposes (including publication of users' statistics in relation to the use of the Group's products and services on an anonymous basis on the Group's public channels such as website and application) and customer satisfaction surveys;
- (16) To keep track of and analyse your purchases, transactions, consumption patterns, account activity, and payment history;
- (17) To provide information about the Company and our products, such as newsletters, events, promotions or contests;
- (18) So far as personal data captured via the CCTV surveillance system is concerned, to facilitate and monitor daily operation of the premises of the Group, and safeguard security, ensuring specifically the safety and security of all users on such premises, prevention, detection and/or reduction of crime, and for analysis and investigation purposes including investigation of legal claims and allegations, and health and safety related matters;
- (19) So far as personal data captured via thermal monitoring devices is concerned, to monitor body temperature of persons at the premises of the Group for purposes of protecting health of users of the said premises and staff of the Group, as well as to monitor and conduct necessary investigations relating to the operation of the selected CCTV cameras with thermal monitoring devices and thermal monitoring devices;
- (20) To comply with applicable legal requirements; and
- (21) Purposes relating thereto.

Note:

- (i) Job applicants and staff of the Group may refer to the specific personal information collection statement for job applicants and staff on the Group's practices with respect to collection of their personal data.
- (ii) In order to improve the quality of the company's internal telephone reception service and to accurately grasp the content of inquiries, the Company may record the content of the user's telephone calls.
- (iii) In relation to marketing purposes as set out in (12) above, the following data of an individual (natural person) user of a corporate customer shall not be disclosed or publicised: name, gender, age, address, HKID card number, any other personal identifiers, specific information on its use of the Company's products and services and personal history.

## Direct marketing

Subject to your consent through an opt-in mechanism, the Group may use your personal data to send communications that may be considered to be direct marketing/promotional material which are relevant to you, including but not limited to promotion of our new product and service offerings, e-newsletters, limited time deals, contract renewal and other services, updates or promotions. In this connection, please note that:

- (1) the name, contact details, products and services purchased, transaction pattern and behaviour and demographic data of a Data Subject held by the Company from time to time may be used by the Company in direct marketing;
- (2) the following classes of services, products and subjects may be marketed: (i) products and services of the Group; and (ii) reward, loyalty or privileges programmes related to the products and services of the Group; and
- (3) In addition to marketing the above aforesaid services, products and subjects itself, the Group also intends to provide the aforesaid data of a Data Subject to a third party reward, loyalty, co-branding or privilege programmes providers for use by them in marketing those services, products and subjects, and the Group requires the data subject's written consent (which includes an indication of no objection) for that purpose.

We are required by law to give you the opportunity to not receive these communications. As such, you will be given the opportunity to indicate your consent, or otherwise, to receive such communications through the opt-in mechanism referred to above. Please note that if you decided not to receive these communications, you may miss important information related to our product and service offerings, or benefits or offers that may impact on your experience as a customer of our Group.

If you do not wish the Company to use or provide to other persons your data for use in direct marketing as described above after opting-in, you may exercise your opt-out right by notifying the Company in writing to Room 1019, 10/F, Chinachem Golden Plaza, 77 Mody Road, Tsim Sha Tsui East, Kowloon, Hong Kong or by email at [chocozaphk@chocozap24.com](mailto:chocozaphk@chocozap24.com).

## **4. Disclosure, transfer and provision of personal data to third parties**

The Company will generally not provide or disclose personal data of a Data Subject held by the Company to external parties but, subject to the provisions of any applicable law and regulations, may be provided to the following parties and/or in any of the following cases:

- (1) any party who owes a duty of confidentiality to the Group and is obliged to keep the personal data confidential;
- (2) any employee, agent, independent contractor, joint venture partners, service providers or any other third party as necessary for the purposes stated above and any such ancillary purpose including provision of administrative, audit, data-processing, document management, technology, telecommunication, storage, payment, security, emergency, reward, loyalty, co-branding and privilege programmes or other services (including direct marketing services) to the Group in Hong Kong or elsewhere ("**Ancillary Purposes**") under a duty of confidentiality to the same;
- (3) organisations and/or institutions with which we jointly offer services or other collaboration opportunities;



- (4) the holding company and/or shareholder(s) of the Group, or any persons or entities controlled or owned by them (each a “**Related Company**”) as necessary for the purposes stated above and any such Ancillary Purposes under a duty of confidentiality to the Group;
- (5) our professional advisers such as lawyers, tax adviser, accountants and auditors;
- (6) any person to whom the Group or the Related Company is under an obligation or otherwise required to make disclosure under the requirements of any law or regulation binding on or applying to the Group or the Related Company, or any disclosure under and for the purposes of any guidelines or guidance given or issued by any legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations with which the Group or the Related Company are expected to comply, or any disclosure pursuant to any contractual or other commitment of the Group or the Related Company with local or foreign legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations, all of which may be within or outside the Hong Kong and may be existing currently and in the future;
- (7) any person in connection with any claims made by or against or otherwise involving the Data Subject in respect of any products or services of the Group;
- (8) any actual or potential assignee, transferee, participant or sub-participant of our rights or business;
- (9) consent of the Data Subject has been obtained; and

(10) it is necessary to protect the physical or mental health and well-being of such Data Subject.

In the event of any suspected fraud or breaches concerning disclosure, transfer and provision of personal data to third parties, we shall take prompt and all appropriate measures to investigate and address such risks.

By providing personal data through the Website or otherwise to us, you expressly authorise us to use and disclose your information as described. Please do not proceed if you do not agree on the same.

## **5. Access to personal data and disclosure, correction, suspension of use, etc. of personal data**

When a Data Subject requests disclosure, correction, suspension of use, etc. of his/her personal data held by the Group, the Group, subject to charging a handling fee, will comply with such request within a reasonable time limit upon ascertaining the identity of the requestor and assessment by the Group that it holds the relevant personal data.

However, the Group may refuse to comply with such data access request if:

- (1) it is not supplied with sufficient information to identify the requestor;
- (2) it cannot comply with the request without disclosing the personal data of a third party; and
- (3) where compliance with the request is for the time being prohibited under all applicable laws and regulations.

For matters and questions regarding the access, handling, correction and disclosure of personal data of the Company, as well as complaints and inquiries, etc., you may contact our Personal Data (Privacy) Officer at [chocozaphk@chocozap24.com](mailto:chocozaphk@chocozap24.com) or write to us at Room 1019, 10/F, Chinachem Golden Plaza, 77 Mody Road, Tsim Sha Tsui East, Kowloon, Hong Kong

## **6. Links to external websites**

The Company's website may contain links to external websites. The Company will do its best to protect the personal data of users, but the handling of personal data by external websites is not within the scope of responsibility of the Company. If you have any comments or inquiries about an external website, please contact the company that operates the external website.

## **7. Security measures**

We take reasonable steps to make sure that the personal data we collect is protected from unauthorised access, disclosure, misuse or loss. We will collect, use or disclose your personal data only with your knowledge and consent as set out in herein unless otherwise required or permitted by law.

We have implemented security safeguards appropriate to the sensitivity of the information, including the use of the physical and electronic security measures. Physical security measures include implementation of restricted access facilities and appropriate disposal of personal data. For security measures, the Website uses an SSL (Secure Socket Layer) security system to protect users' personal data. Personal data such as name, address and telephone number entered by the user is automatically encrypted by SSL when sending and receiving to prevent external third parties from intercepting the user's personal data.

The Company uses a dedicated server protected by a firewall security system for management of personal data, and does its best to prevent unauthorized access and data leakage.

If the Group has a contract with another third party organization to provide a service on its behalf, the Group will ensure they have appropriate security measures and only process your information as the Group has authorized. Those organizations will not be entitled to use your personal information for their own purposes. The Group will take reasonable steps to check these organizations to make sure that they are meeting the security requirements as deemed acceptable by the Group.

## **8. Handling of Browsing History Information and Other Related Information**

### **(I) Collection of Browsing History Information and Other Related Information**

The Company may collect the following information (hereinafter referred to as "**Browsing History and Related Information**") from your device or system when you visit the Company's website to help distinguish you from other users of our products and services. This helps us to provide you with a tailor-made experience when you use our products and services and also allow us to improve our offerings.

- Information that identifies the terminal (cookie information and other individual identification numbers of terminals)
- User's usage environment (IP address, operating system and browser information, etc.))
- Records of user's browsing history on the Company's website, including traffic and time spent
- Location information

The Company may collect the Browsing History and Related Information by cookies and other tools. Cookies are small text files containing small amounts of information which are downloaded and may be stored on any of your internet enabled devices. We may also use other technologies such as web beacons, which are small graphic files that contain a unique identifier that allows us to check whether you have accessed certain content. For the purpose of such Statement, all such technologies will be considered "cookies". You may turn off or delete cookies by changing your browser's settings. Since these settings vary in different browsers and browser extensions, we cannot guarantee that the site would function properly in all circumstances. Note that you may need to clear your browser's cookies, site data and cached web content (including offline content), then restart your browser for the changes to take effect. However, our services may not be effectively provided in the event you turn off or delete cookies, so it is recommended that cookies are allowed on your browser. By using our

website without deleting or rejecting some or all cookies, you agree that we can place those cookies that you have not deleted or rejected on your device.

The Browsing History and Related Information will not be combined with other information to track/profile users. We only retain the Browsing History and Related Information for the duration needed for the function they are used for.

## (II) Purpose of use of Browsing History and Related Information

The purpose of use of Browsing History and Related Information is as follows:

- To confirm whether it is an access from the same user in the service that requires login
- To remind users to enter the ID and password again after a certain period of time to ensure the security
- To provide users with content, advertisements and information about various services about the Company and its commercial partners that are most suitable for the users
- To record your use of our website and your responses to our online advertisements posted on our website as well as other social media platforms to deliver personalized content to you, including advertisements relevant to your interests;
- To enrich and improve the content of services and advertisements provided by the Company and its commercial partners, or to conduct analysis and explore new services
- To display the layout and information suitable for the user's use
- Fraud prevention and detection

## (III) Use of Third-Party Data Processing Services for Behaviour-Targeted Advertising

The Company may directly or indirectly transfer the user's Browsing History and Related Information to a third-party data processor as set out below to deliver behavior-targeted advertisements based on users' interests and concerns. If you want us to stop sending the Browsing History and Related Information to third parties, please see "Opting Out of Behavior-Targeted Advertising" below.

## (IV) Opting Out of Behavior-Targeted Advertising

The Company may work with third parties as set out below to research certain usage and activities on parts of our website on our behalf. These third parties may use technologies such as tracking tags and cookies to conduct such research. The information collected through such technologies by these third parties may be used to find out more about our users, including number of the visitors, their behaviour and usage patterns, for more accurate reporting and to improve the effectiveness of our marketing. These third parties may also use such technology to understand the content with which you have engaged on our website so they may subsequently deliver some targeted advertisements to you. You should refer to such third parties' own cookie and privacy policies at the following hyperlinks for information about how they may use your information, which also contain instructions to opt-out of their use and further processing of your data. Opting out will not remove advertising from the pages you visit, but, instead, opting out will result in the such advertisements you see not being matched to your interests. This implies that such advertisements you see will not be matched to your interests as captured by those specific cookies of the third party data processors.

CMerTV, Inc.

<https://www.cmertv.co.jp/cookie>

Criteo

<https://www.criteo.com/jp/privacy/>

CA, Inc.

<https://www.ca.com/jp/legal/privacy.html>

Facebook

<https://www.facebook.com/about/privacy>

Google, Inc.  
<https://policies.google.com/privacy>  
<https://adssettings.google.com/authenticated>  
LINE  
[https://terms.line.me/line\\_rules\\_optimize?lang=ja](https://terms.line.me/line_rules_optimize?lang=ja)  
NewsTV  
<https://newstv.co.jp/privacy/>  
Outbrain  
<https://www.outbrain.com/legal/privacy#privacy-policy>  
Sizmek  
<https://www.sizmek.com/privacy-policy/>  
<https://www.sizmek.com/privacy-policy/#options>  
SmartNews  
<https://www.smartnews.com/privacy/#jp>  
<http://www.smartnews-ads.com/optout/>  
Taboola, Inc  
<https://www.taboola.com/taboola-隱私政策>  
Twitter, Inc.  
<https://twitter.com/ja/privacy>  
Yahoo Japan Corporation  
<https://btoptout.yahoo.co.jp/optout/preferences.html>  
<https://accounts.yahoo.co.jp/privacy/>  
So-net Media Networks Co., Ltd.  
<http://www.so-netmedia.jp/privacypolicy/>  
[http://www.so-netmedia.jp/cookie/dsp\\_optout.html](http://www.so-netmedia.jp/cookie/dsp_optout.html)  
Rakuten Group, Inc.  
<https://grp12.ias.rakuten.co.jp/optout/>  
AMoAd  
<http://www.amoad.com/guideline/#optout>

All of these links are external to the Group and so the Group is not responsible for the content of these links.

RIZAP HONG KONG LIMITED

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