

PRIVACY POLICY

Effective Date: 2026

1. Definitions In this Policy, the following terms shall have the meanings ascribed to them below:

- **Data:** All information submitted by you to owner of the Website (“Us”, “Company”) via the Website, including definitions under applicable Data Protection Laws.
- **Data Protection Laws:** Any applicable laws relating to personal data processing, including the Personal Data (Privacy) Ordinance (Cap. 486) of the Laws of Hong Kong.
- **User/You:** Any third party accessing the Website who is not employed by or providing services to Company.
- **Website:** <https://tkdeal.com/> and its sub-domains.

2. Scope of Policy

This Privacy Policy governs the actions of Company and Users regarding this Website. It does not extend to third-party websites accessed via links on our site (e.g., social media). For the purpose of Data Protection Laws, Company acts as the "organisation" determining the data processing purposes.

3. Data Collection

We collect Data in two primary ways:

- **Direct Submission:** Information you provide voluntarily (e.g., contacting us via email, phone, or website forms).
- **Automatic Collection:** Technical data collected automatically upon your visit, such as IP address, access times, and interaction patterns, to help us improve Website navigation and content.

4. Use of Data

We process your Data strictly to the extent necessary to fulfill the following purposes:

- Responding to enquiries submitted via the Website;
- Delivering our professional services;

- Sending requested information, newsletters, or marketing materials;
- Notifying you of organizational or technical updates;
- Handling complaints and feedback;
- Conducting service improvement surveys.

We adhere to the principle of data minimization as required by Data Protection Laws.

5. Data Security and Storage

We implement robust technical and organizational measures to protect your Data against unauthorized access, accidental loss, or destruction:

- **Security:** We utilize encryption software and strictly controlled password access for accounts (if applicable).
- **Storage:** Your Data is stored in our secure "Clients" database located on protected servers.
- **Breach Protocol:** We have procedures in place to deal with any suspected data breach. If you suspect any misuse of your Data, please contact us immediately at sale@tkdeal.com.

6. Data Retention

We retain your Data only for as long as necessary to fulfill the purposes outlined in this policy or as required by law. Even after deletion requests, some Data may be retained for legal, tax, or regulatory compliance.

7. Your Rights

Under Data Protection Laws, you possess specific rights regarding your personal information:

- **Right to Access:** Request copies of your Data or ask for modifications.
- **Right to Correct:** Rectify inaccurate or incomplete Data.
- **Right to be Forgotten:** Request deletion of your Data from our systems.
- **Right to Restrict/Object:** Limit or object to our use of your Data.
- **Right to Portability:** Request the transfer of your Data.

To exercise these rights, please contact us at sale@tkdeal.com. If you are unsatisfied with our handling of your request, you may contact the **Office of the**

Privacy Commissioner for Personal Data (PCPD) in Hong Kong
(<https://www.pcpd.org.hk/>).

8. Business Transfers

In the event that Company undergoes a business transition, such as a merger, acquisition, or sale of assets, User Data may be part of the transferred assets. The new owner will be authorized to use the Data under the terms of this existing privacy policy.

9. External Links

Our Website may contain links to external sites. We have no control over and assume no responsibility for the content or privacy practices of such websites. We advise you to review their policies separately.

10. General & Changes

- **Updates:** We may update this policy as necessary or required by law. Changes will be posted on the Website, and your continued use constitutes acceptance of the new terms.
- **Non-Waiver:** No delay in exercising any right under this policy shall operate as a waiver of such right.
- **Severability:** If any part of this policy is deemed invalid, the remaining sections shall continue in full force.

Contact Us: For any questions regarding this Privacy Policy, please email us at sale@tkdeal.com.