

PRIVACY POLICY

We believe you should always know what data we collect from you, and how we use it. We also think that you should have meaningful control over both. We want to empower you to make the best decisions about the information that you share with us. That is the basic purpose of this Privacy Policy.

1. Data we collect from you

Information you provide when you create a will, or when you correspond with us by phone, e-mail or otherwise:

- Full legal name, year of birth, gender
- Identification document and number
- Telephone number, email address, mailing address
- Marital status and information regarding your family members and pets, if any
- Names, identification document and number, and contact numbers of your elected guardians(s), beneficiary(s) and/or executor(s)
- Estimated value of your estate and information concerning your assets
- Charitable donations (specific amount or percentage of total estate)

Information we automatically collect about you when you visit our website:

- Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your website login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and
- Information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our website (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our customer service number.

2. How we use your data

To provide our services to you: We need certain personal information about you in order to create a will that is legally enforceable and accurately reflects your wishes.

To provide functionalities essential to our services: We may share your information with service providers who work on our behalf, such as cloud storage providers, website hosting service providers, and other third party partners that provide features or functionalities we integrate into our website, such as document automation softwares and email communication providers. You agree to give them access to your data even if they are located outside of Hong Kong.

To help you use our services: We may send you transactional communications about the service (such as the status of your will) or to respond to your questions or requests.

To allow lawyers to communicate with you directly in relation to the preparation of your will: Every will is prepared by a law firm partner of ours. As such, lawyers will have access to your personal information to prepare your will, and to contact you if any information about your will requires your clarification.

To allow charities to communicate with you if you consent to be communicated with: If you agree to share your name, amount or percentage of your gift, year of birth, email address, phone number and mailing address with a charity or charities, they will have the right to provide you with marketing communications. We will obtain this consent from you separately from the consent you give when registering for our services.

To create anonymised data sets: We will anonymise and aggregate the personal information we obtain from users, and use them for analytics, benchmarking and other business purposes. We will also share some of these anonymised information with charities to help them understand the efficacy of their legacy marketing efforts while maintaining your privacy.

To improve our website, ensure its availability and proper functioning: We will generate and analyse statistics about your use of our website and services, to customize your experience with our website (e.g. based on the type of browser or device you use), and to make our website more secure.

For user research: We may contact you in relation to your experience of using our products and services. We will use any feedback provided to tailor and improve our services. We may conduct research to develop new products and services where input from users' experience would inform our approach. We may also use your information for troubleshooting, testing, and statistical and survey purposes.

For marketing purposes: If you consent to receive marketing communications from us, we will send you marketing communications in line with the preferences you have provided.

3. Use of cookies

Cookies are small text files that are placed on your device when you access our website. We use cookies to identify your access and monitor usage and web traffic on our website to

customise and improve our products and services. We may, from time to time, use one or more of the following cookies:

(a) Strictly necessary cookies

These cookies are required for the operation of our website.

(b) Analytical/performance cookies

These cookies allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it.

(c) Functionality cookies

These cookies are used to recognise you when you return to our website.

(d) Targeting cookies

These cookies record your visit to our website, the pages you have visited and the links you have followed.

You can block cookies by activating the setting on your browser that allows you to refuse the use of all or some cookies. However, if you do so, you may not be able to access all or parts of our site.

4. Storing your data

We only retain personal information for so long as it is reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. After such time, we will delete or anonymise your information, or if this is not possible, we will securely store your information and isolate it from further use.

We use cloud service providers to host the information we collect so we can provide our services to you. We take reasonable steps to confirm that all third-party service providers that we engage process personal information in the manner that provides at least the same level of protection as is provided under this policy.

In particular, the information you provide when creating a will through our website will be processed by a third party software provider that takes security very seriously, storing data of our users on a segregated Amazon Web Services (AWS) instance and subdomain, ensuring full data isolation. All of the data is encrypted in transit via Transport Layer Security (TLS). The database is encrypted using AES-256 technology, and AWS data centers are managed in accordance with SOC 1-3, PCI DSS Level 1 and ISO 9001/ISO 270001.

As a service with an online presence, we may transfer, process, and store your information outside Hong Kong where our service providers operate for the purpose of providing our products and services to you. By using our products and services you agree to any such transfer of your data.

We have put in place procedures to deal with any suspected privacy breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

While we implement safeguards designed to protect your information, please note that no transmission of information on the Internet is completely secure. We cannot guarantee that your information, during transmission through the Internet or while stored on our systems or processed by us, is absolutely safe and secure.

5. Your rights

You have the right to:

- (a) be informed of what we do with your data;
- (b) request a copy of data we hold about you;
- (c) require us to correct any inaccuracy or error in any data we hold about you;
- (d) request erasure of your data (unless we must keep such data for legal compliance purposes);
- (e) object to or restrict our use of your data (including for marketing purposes);
- (f) request to receive some of your data in a structured, commonly used, and machine readable format, and request that we transfer such information to another party; and
- (g) withdraw your consent at any time where we are relying on consent to process your data.

You may opt out of receiving marketing materials from us by using the unsubscribe link in our communications or by contacting us. Please note, however, that even if you opt out from receiving marketing materials from us, you will continue to receive notifications or information from us that are necessary for the use of our products or services.

As a security measure, we may need specific information from you to help us confirm your identity when processing your privacy requests or when you exercise your rights.

Any request under this section will normally be addressed free of charge. However, we may charge a reasonable administration fee if your request is clearly unfounded, repetitive, or excessive.

We will respond to all legitimate requests within one (1) month. Occasionally, it may take us longer than a month if your request is particularly complex or if you have made a number of requests.

6. Change of ownership

If we are acquired by a third party as a result of a merger, acquisition, or business transfer, your personal information may be disclosed and/or transferred to a third party in connection with such transaction. We will notify you if such transaction takes place and inform you of any choices you may have regarding your information.

7. Links to other websites, apps or services

Our website may, from time to time, contain links to third-party websites, apps or online services over which we have no control. If you follow a link to any of these websites or apps, or use their services, your information will be governed by their policies. We encourage you to review their policies before you submit information to them.

8. Changes to our privacy policy

Any changes we make to our privacy policy in the future will be posted here. Please check back frequently to see any updates or changes to our privacy policy. By continuing to use our website and services, you agree to be bound by the latest policy.

9. Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to hi@forevergift.hk.

This privacy policy was last updated on 29th March 2021.