

PRIVACY POLICY

Welcome to Eleven Holdings Limited.

Eleven Holdings Limited (hereinafter referred to as “**Company**”, “**we**”, “**us**”, or “**our**”) having its corporate office at UNIT 1507B, 15/F., EASTCORE, 398 KWUN TONG ROAD, KWUN TONG, HONG KONG. We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about this privacy notice or our practices with regard to your personal information, please contact us at support@eleveninternet.net

When you visit our websites <https://www.eleveninternet.net/> and <https://client.eleveninternet.net/> (the “**Website**” or “**Platform**”), and more generally, use any of our services (the “**Services**”, which include the Website), we appreciate that you are trusting us with your personal information. We take your privacy very seriously. In this privacy notice, we seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important. If there are any terms in this privacy notice that you do not agree with, please discontinue the use of our Services immediately.

This privacy notice applies to all information collected through our Services (which, as described above, includes our Website), as well as any related services, sales, marketing or events.

WHAT INFORMATION DO WE COLLECT?

The personal information you disclose to us

***In Short:** We collect information that you provide to us.*

We may collect personal information that you voluntarily provide to us when you register on the Website, express an interest in obtaining information about us or our products and Services or otherwise when you contact us.

The personal information that we may collect depends on the context of your interactions with us and the Website, creating an account, the choices you make and the products and features you use. The personal information we collect may include the following:

Personal Information Provided by You. We collect names; email addresses; mailing addresses; and other similar information.

Information automatically collected

***In Short:** Some information — such as your Internet Protocol (IP) address and/or browser and device characteristics — is collected automatically when you visit our Website.*

When you access our websites, we, our service providers and our partners may automatically collect information about you, your computer or mobile device, and your activity on our websites. Typically, this information includes your computer or mobile device operating system type and version number, manufacturer and model, device identifier (such as the Google Advertising ID or Apple ID for Advertising), browser type, screen resolution, IP address, the website you visited before browsing to our website, general location information such as city, state or geographic area; and information about your use of and actions on or in our websites, such as pages or screens you accessed, how long you spent on a page or screen, navigation paths between pages or screens, information about your activity on a page or screen, access times, and length of access.

Our service providers and business partners may collect this type of information over time and across third-party websites. This information is collected via various mechanisms, such as via web beacons, embedded scripts, and similar technologies. This type of information may also be collected when you read our HTML-enabled emails.

The information we collect includes:

- **Log and Usage Data.** Log and usage data is service-related, diagnostic usage and performance information our servers automatically collect when you access or use our Website and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type and settings and information about your activity on the Website (such as the date/time stamps associated with your usage, pages and files viewed, searches and other actions you take such as

which features you use), device event information (such as system activity, error reports (sometimes called 'crash dumps') and hardware settings).

- **Device Data.** We collect device data such as information about your computer, phone, tablet or other devices you use to access the Website. Depending on the device used, this device data may include information such as your IP address (or proxy server), device application identification numbers, location, browser type, hardware model Internet service provider and/or mobile carrier, and operating system configuration information.
- **Location Data.** We collect information data such as information about your device's location, which can be either precise or imprecise. How much information we collect depends on the type of settings of the device you use to access the Website. For example, we may use GPS and other technologies to collect geolocation data that tells us your current location (based on your IP address). You can opt out of allowing us to collect this information either by refusing access to the information or by disabling your Locations settings on your device. Note however, if you choose to opt out, you may not be able to use certain aspects of the Services.

HOW DO WE USE YOUR INFORMATION?

***In Short:** We process your information for purposes based on legitimate business interests, the fulfillment of our contract with you, compliance with our legal obligations, and/or your consent.*

We use personal information collected via our Website for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests, in order to enter into or perform a contract with you, with your consent, and/or for compliance with our legal obligations. We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:

- **To manage user accounts.** We may use your information for the purposes of managing our account and keeping it in working order.

- **To send administrative information to you.** We may use your personal information to send you product, service and new feature information and/or information about changes to our terms, conditions, and policies.
- **To protect our Services.** We may use your information as part of our efforts to keep our Website safe and secure (for example, for fraud monitoring and prevention).
- **To enforce our terms, conditions and policies for business purposes, to comply with legal and regulatory requirements or in connection with our contract.**
- **To respond to legal requests and prevent harm.** If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.
- **To respond to user inquiries/offer support to users.** We may use your information to respond to your inquiries and solve any potential issues you might have with the use of our Services.
- **To send you marketing and promotional communications.** We and/or our third-party marketing partners may use the personal information you send to us for our marketing purposes, if this is in accordance with your marketing preferences. For example, when expressing an interest in obtaining information about us or our Website, subscribing to marketing or otherwise contacting us, we will collect personal information from you. You can opt-out of our marketing emails at any time (see the "WHAT ARE YOUR PRIVACY RIGHTS"below).
- **Deliver targeted advertising to you.** We may use your information to develop and display personalized content and advertising (and work with third parties who do so) tailored to your interests and/or location and to measure its effectiveness.

WILL YOUR INFORMATION BE SHARED WITH ANYONE?

***In Short:** We only share information with your consent, to comply with laws, to provide you with services, to protect your rights, or to fulfill business obligations.*

We may process or share the data that we hold based on the following legal basis:

- **Consent:** We may process your data if you have given us specific consent to use your personal information for a specific purpose.
- **Legitimate Interests:** We may process your data when it is reasonably necessary to achieve our legitimate business interests.
- **Performance of a Contract:** Where we have entered into a contract with you, we may process your personal information to fulfil the terms of our contract.
- **Legal Obligations:** We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal processes, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- **Vital Interests:** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

More specifically, we may need to process your data or share your personal information in the following situations:

- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **Third-Party Advertisers:** We may use third-party advertising companies to serve ads when you visit or use the Website. These companies may use information about your visits to our Website(s) and other websites that are contained in web cookies and other tracking technologies in order to provide advertisements about goods and services of interest to you.

- **Affiliates:** We may share your information with our affiliates, in which case we will require those affiliates to honour this Policy. Affiliates include our parent company and any subsidiaries, joint venture partners or other companies that we control or that are under common control with us.
- **Business Partners:** We may share your information with our business partners to offer you certain products, services or promotions.

WHAT IS OUR STANCE ON THIRD-PARTY WEBSITES?

***In Short:** We are not responsible for the safety of any information that you share with third-party providers who advertise, but are not affiliated with, our Website.*

The Website may contain third parties links and which may link to other websites like Instagram, Facebook etc. We cannot guarantee the safety and privacy of the data you provide to any third parties. Any data collected by third parties is not covered by this Policy. We are not responsible for the content or privacy and security practices and policies of any third parties, including other websites, services or applications that may be linked to or from the Website. We strongly advise you to review the Privacy Policy of every site you visit. We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

WE HEREBY DISCLAIM LIABILITY FOR, ANY INFORMATION, MATERIALS, PRODUCTS, OR SERVICES POSTED OR OFFERED AT ANY OF THE THIRD-PARTY SITES LINKED TO THIS WEBSITE. BY CREATING A LINK TO A THIRD-PARTY WEBSITE, WE DO NOT ENDORSE OR RECOMMEND ANY PRODUCTS OR SERVICES OFFERED OR INFORMATION CONTAINED ON THAT WEBSITE, NOR ARE WE LIABLE FOR ANY FAILURE OF PRODUCTS OR SERVICES OFFERED OR ADVERTISED AT THOSE SITES. SUCH A THIRD PARTY MAY HAVE A PRIVACY POLICY DIFFERENT FROM THAT OF OURS AND THE THIRD-PARTY WEBSITE MAY PROVIDE LESS SECURITY THAN THIS SITE.

HOW LONG DO WE KEEP YOUR INFORMATION?

***In Short:** We keep your information for as long as necessary to fulfill the purposes outlined in this privacy notice unless otherwise required by law.*

We will only keep your personal information for as long as it is necessary for the purposes set out in this Policy, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). No purpose in this Policy will require us keeping your personal information for longer than the period of time in which users have an account with us.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

HOW DO WE KEEP YOUR INFORMATION SAFE?

***In Short:** We aim to protect your personal information through a system of organizational and technical security measures.*

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security, and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Website is at your own risk. You should only access the Website within a secure environment.

WHAT ARE YOUR PRIVACY RIGHTS?

Your Data Protection Rights Under General Data Protection Regulation (GDPR).

If you are a resident of the European Union (EU) and European Economic Area (EEA), you have certain data protection rights, covered by GDPR. We aim to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data. If you wish to be informed of what Personal Data we hold about you and if you want it to be removed from our systems, please email us at support@eleveninternet.net.

In certain circumstances, you have the following data protection rights:

1. The right to access, update or to delete the information we have on you;
2. The right of rectification. You have the right to have your information rectified if that information is inaccurate or incomplete;
3. The right to object. You have the right to object to our processing of your Personal Data;
4. The right of restriction. You have the right to request that we restrict the processing of your personal information;
5. The right to data portability. You have the right to be provided with a copy of your Personal Data in a structured, machine-readable and commonly used format;
6. The right to withdraw consent. You also have the right to withdraw your consent at any time where we rely on your consent to process your personal information;

Please note that we may ask you to verify your identity before responding to such requests. Please note, we may not be able to provide Service without some necessary data.

You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority in the European Economic Area (EEA).

YOUR DATA PROTECTION RIGHTS UNDER THE CALIFORNIA PRIVACY PROTECTION ACT (CalOPPA)

According to CalOPPA, we agree to the following:

1. our Privacy Policy link includes the word “Privacy”, and can easily be found on the home page of our website;
2. users will be notified of any privacy policy changes on our Privacy Policy Page;
3. users are able to change their personal information by emailing us at the contact details mentioned in “Contact Us” clause.

Our Policy on “**Do Not Track**” Signals:

We honor Do Not Track signals and do not track, plant cookies, or use advertising when a Do Not Track browser mechanism is in place. Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked.

DO CALIFORNIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

***In Short:** Yes, if you are a resident of California, you are granted specific rights regarding access to your personal information.*

California Civil Code Section 1798.83, also known as the “Shine The Light” law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

If you are under 18 years of age, reside in California, and have a registered account with the Website, you have the right to request removal of unwanted data that you publicly post on the Website. To request removal of such data, please contact us using the contact information provided below, and include the email address associated with your account and a statement that

you reside in California. We will make sure the data is not publicly displayed on the Website, but please be aware that the data may not be completely or comprehensively removed from all our systems (e.g. backups, etc.).

CCPA Privacy Notice

The California Code of Regulations defines a **"resident"** as:

- a. every individual who is in the State of California for other than a temporary or transitory purpose and
- b. every individual who is domiciled in the State of California who is outside the State of California for a temporary or transitory purpose

All other individuals are defined as **"non-residents."**

If this definition of "resident" applies to you, certain rights and obligations apply regarding your personal information.

Your rights with respect to your personal data

a. Right to request deletion of the data - Request to delete

You can ask for the deletion of your personal information. If you ask us to delete your personal information, we will respect your request and delete your personal information, subject to certain exceptions provided by law, such as (but not limited to) the exercise by another consumer of his or her right to free speech, our compliance requirements resulting from a legal obligation or any processing that may be required to protect against illegal activities.

b. Right to be informed - Request to know

Depending on the circumstances, you have a right to know:

- whether we collect and use your personal information;
- the categories of personal information that we collect;

- the purposes for which the collected personal information is used;
- whether we sell your personal information to third parties;
- the categories of personal information that we sold or disclosed for a business purpose;
- the categories of third parties to whom the personal information was sold or disclosed for
- a business purpose; and
- the business or commercial purpose for collecting or selling personal information.

In accordance with applicable law, we are not obligated to provide or delete consumer information that is de-identified in response to a consumer request or to re-identify individual data to verify a consumer request

c. Right to Non-Discrimination for the Exercise of a Consumer's Privacy Rights

We will not discriminate against you if you exercise your privacy rights.

Upon receiving your request, we will need to verify your identity to determine you are the same person about whom we have the information in our system. These verification efforts require us to ask you to provide information so that we can match it with the information you have previously provided us. For instance, depending on the type of request you submit, we may ask you to provide certain information so that we can match the information you provide with the information we already have on file, or we may contact you through a communication method (e.g. phone or email) that you have previously provided to us. We may also use other verification methods as the circumstances dictate.

We will only use personal information provided in your request to verify your identity or authority to make the request. To the extent possible, we will avoid requesting additional information from you for the purposes of verification. If, however, if we cannot verify your identity from the information already maintained by us, we may request that you

provide additional information for the purposes of verifying your identity, and for security or fraud-prevention purposes. We will delete such additionally provided information as soon as we finish verifying you.

d. Other privacy rights

- you may object to the processing of your personal data.
- you may request correction of your personal data if it is incorrect or no longer relevant, or ask to restrict the processing of the data.
- you can designate an authorized agent to make a request under the CCPA on your behalf. We may deny a request from an authorized agent that does not submit proof that they have been validly authorized to act on your behalf in accordance with the CCPA.
- you may request to opt-out from future selling of your personal information to third parties. Upon receiving a request to opt-out, we will act upon the request as soon as feasibly possible, but no later than 15 days from the date of the request submission.

To exercise these rights, you can contact us by referring to the contact details at the bottom of this document. If you have a complaint about how we handle your data, we would like to hear from you.

CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track (“DNT”) feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage, no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

CHILDREN’S PRIVACY

Our Services are not for the use of children below the age of 18 (“**Child**” or “**Children**”).

We do not knowingly collect personally identifiable information from Children under 18. If you become aware that a Child has provided us with Personal Data without the parent's consent, please contact us. If we become aware that we have collected Personal Data from Children, we take steps to remove that information from our servers.

PAYMENTS

We provide paid products and/or services within the Service. In that case, we use third-party services for payment processing. (i.e Stripe, Wise)

We don’t store or collect your payment details. That information is provided directly to our third-party payment processors whose use of your personal information is governed by their Privacy Policy. These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, Mastercard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment information.

DO WE MAKE UPDATES TO THIS NOTICE?

***In Short:** Yes, we will update this notice as necessary to stay compliant with relevant laws.*

We may update this privacy notice from time to time. The updated version will be indicated by an updated “Last updated” date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

CONTACT US

If you have questions or comments about this notice, you may email us at;

Email: support@eleveninternet.net

Phone: +1 (201)-256-0979

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