

## Privacy Policy

Hong Kong BGE Limited (“**HKBGE**,” the “**Company**” “**we**,” “**us**” or “**our**”) is a cryptocurrency trading exchange accessible via our site located at [www.bgexchange.com](http://www.bgexchange.com) (the “**Website**”) and our mobile application (together with the **Website**, the “**Platform**”). This Platform is exclusively used by users to trade digital assets and provides them with relevant Services (hereinafter referred to as “the **Services**”). This policy applies to any individual’s personal data which is in our possession or under our control. In the event of any inconsistency between different language versions of this policy, the English version shall prevail.

Our Privacy Policy (“**Privacy Policy**”) is designed to help you understand how we collect, use and share your personal information and to assist you in exercising the privacy rights available to you. By using the Services, you accept the terms of this Policy and our Terms of Use, and consent to our collection, use, disclosure, and retention of your information as described in this Policy. If you have not done so already, please also review our terms of use. The terms of use contain provisions that limit our liability to you and require you to resolve any dispute with us on an individual basis and not as part of any class or representative action. IF YOU DO NOT AGREE WITH ANY PART OF THIS PRIVACY POLICY OR OUR TERMS OF USE, THEN PLEASE DO NOT USE ANY OF THE SERVICES.

We only use your personal information as permitted by law. The Company will abide by the principle of protecting users’ privacy and comply with the requirements of the Personal Data (Privacy) Ordinance (Chapter 486 of the Laws of Hong Kong) (the “**PDPO**”).

### WHAT WE COLLECT

The categories of personal information we collect depend on whether you are a customer, user, applicant or visitor, and the requirements of applicable law.

Failure to supply any Personal Data may result in us being unable to provide you with our products or services (or with all of the features and functionality offered by our products or services), to respond to queries or requests that you submit to us or to comply with any laws, regulations, guidelines and codes issued by regulatory or other authorities.

You may, however, visit our websites anonymously.

## Information You Provide to Us

### 1. Account Information:

In order to comply with our Know Your Customer (“KYC”) and Anti-Money Laundering obligations under applicable laws and regulations, when you register an account with us and/or would like to use our services on our platform, you may be asked to provide or grant authorization to us to get access to, including but not limited, to the following information:

- Identification information: name, date of birth, gender, nationality, phone number, home address, email address, passport number, and other information necessary;
- Specimen signature(s);
- Employment details, such as occupation, directorships and other positions held, employment history, salary, and/or benefits;
- Information about your risk profile, investments, investment objectives, knowledge and experience and/or business interests and assets;
- Banking and trading information, such as account numbers and transactions;
- Transaction Information: Information about the transactions made on our Services, such as the name of the sender, the name of the recipient, the amount, currency preferences, payment method, date, and/or timestamp;
- Your personal opinions made known to us, such as through feedback or surveys;
- Wallet information: When you sign up to use our Web3 browser, self-custody, or multi-coin crypto wallet, and connect it to your Coinbase account, we collect your Wallet address and information related to integrations that you select;
- Institutional information: certificate of incorporation, business address, certificate of good standing, certificate of incumbency, organization chart, proof of legal formation (e.g. Articles of Incorporation), and personal identification information for directors, shareholders and/or authorized person;
- Profile information: your preferences and settings for your account, such as payment methods, receiving marketing communications and details about how you engage with them, information about how you use the Service and interact with us, your interests, preferences, feedback and survey responses;

- Financial information: Bank account information, source of funds, transaction history, trading data and/or tax identification;

## **2. Social Media Content:**

We may offer forums, blogs, or social media pages. Any content you provide on these channels will be considered “public” and is not subject to privacy protections.

## **3. Your Communications with Us:**

We collect personal information from you such as email address, phone number, or mailing address when you request information about our Services, request customer or technical support, apply for a job or otherwise communicate with us.

## **Information Automatically Collected**

We may automatically record certain information about how you use our app, browser, device and product (we refer to this information as “Log Data”). Log Data may include information such as a user’s Internet Protocol (IP) address, device and browser type, operating system, the pages or features of our Sites to which a user browsed and the time spent on those pages or features, the frequency with which the Sites are used by a user, search terms, the links on our Sites that a user clicked on or used, and other statistics. We use this information to administer the Service and we analyze (and may engage third parties to analyze) this information to improve and enhance the Service by expanding its features and functionality and tailoring it to our users’ needs and preferences.

Cookies, Pixel Tags/Web Beacons, Analytics Information, and Interest-Based Advertising technologies. We, as well as third parties that provide content, advertising, or other functionality on the Services, may use cookies, pixel tags, local storage, and other technologies (“Technologies”) to automatically collect information through the Services. Technologies are essentially small data files placed on your computer, tablet, mobile phone, or other devices that allow us and our partners to record certain pieces of information whenever you visit or interact with our Services.

Cookies: Cookies are small text files placed in visitors’ computer browsers to store their preferences. Most browsers allow you to block and delete cookies. However, if you do that, the Services may not work properly.

**Pixel Tags/Web Beacons:** A pixel tag (also known as a web beacon) is a piece of code embedded in the Services that collects information about users' engagement on that web page. The use of a pixel allows us to record, for example, that a user has visited a particular web page or clicked on a particular advertisement.

**Analytics and Financial Data:** We use third-party tools to monitor and analyze the use of our Services, and to automate certain processes related to the development and operation of our Services:

### **Information from Other Sources**

We may obtain information about you from other sources, including through third party services and organizations to supplement information provided by you.

- **Public Database Information:** We obtain information about you from public databases, such as the United Nations Sanctions List, listing on any sanctions lists maintained by public authorities, and other data as necessary;
- **Blockchain Data:** We may analyze public blockchain data, including timestamps of transactions or events, transaction IDs, digital signatures, transaction amounts, and wallet addresses;
- **Information from our Marketing and Advertising Partners:** We receive information such as your name and contact information from our marketing partners, including in some instances what marketing content you viewed or the actions you take on our Sites;
- **Information from Analytics Providers:** We receive information about your Site usage, interactions, age group, and survey responses (including prior to account creation, in some cases);
- **Research and In-App Survey Information:** We use third party service providers to conduct in-app surveys to better understand our Customers' experience and improve our Services. The information we receive from our research partners is pseudonymous;

For example, if you access our Services through a third-party application, such as an app store, a third-party login service, or a social networking site, we may collect information

about you from that third-party application that you have made public via your privacy settings. Information we collect through these services may include your name, your user identification number, your user name, location, gender, birth date, email, profile picture, and your contacts stored in that service. This supplemental information allows us to verify information that you have provided to us and to enhance our ability to provide you with information about our business, products, and Services.

### **Information we will never collect**

We will never ask you to share your password, private keys or wallet seed. Never trust anyone or any site that asks you to enter your private keys or wallet seed.

## **USE OF PERSONAL INFORMATION**

### **1. To provide our service**

We will use your personal information in the following ways:

- To enable you to access and use our services properly;
- To provide and deliver products and services that you may request;
- To provide customer support;
- To process and complete transactions, and send you related; information, including purchase confirmations and invoices;
- To send information, including confirmations, promotions, upcoming events, technical notices, market news, system updates, security alerts, and support and administrative messages to you in a timely manner;
- To promote the safety, security and integrity of our Services.

### **2. To comply with law**

We use your personal information as we believe necessary or appropriate to comply with applicable laws (including anti-money laundering (AML) laws and know-your-customer (KYC) requirements), lawful requests and legal process, such as to respond to subpoenas or requests from government authorities.

### **3. For compliance, fraud prevention, and safety**

We may use your personal information to protect, investigate, and deter against fraudulent, unauthorized, or illegal activity.

#### **4. To communicate with you**

We use your personal information to communicate about promotions, upcoming events, and other news about products and services offered by us and our selected partners.

#### **5. To optimize our platform and enhance our service quality**

In order to optimize your user experience, we may use your personal information to operate, maintain, and improve our Services. We may also use your information to respond to your comments and questions regarding the Services, and to provide you and other users with general customer service.

#### **6. With your consent**

We may use or share your personal information with your consent, such as when you consent to let us post your testimonials or endorsements on our Sites, you instruct us to take a specific action with respect to your personal information, or you opt into third party marketing communications.

#### **7. For record keeping requirements**

In order to comply with relevant rules and regulations, we are required to keep, where applicable, accounting, trading and other records as are sufficient to ensure the integrity, security, availability, reliability and completeness of all information, both in physical and electronically stored form.

### **SHARING OF PERSONAL INFORMATION**

We do not share the personal information that you provide us with other organizations without your express consent, except as described in this Privacy Policy. We disclose personal information to third parties under the following circumstances:

- **Affiliates.** We may disclose your personal information to our subsidiaries and corporate affiliates (i.e. our family of companies that are related by common ownership or control) for purposes consistent with this Privacy Policy.
- **Business Partners.** We may share personal information when we do a business deal, or negotiate a business deal, involving the sale or transfer of all or a part of our business or assets. These deals can include any merger, financing, acquisition, or bankruptcy transaction or proceeding.
- **Compliance with Laws and Law Enforcement; Protection and Safety.** We may share personal information for legal, protection, and safety purposes.
  - We may share information to comply with laws, including KYC and AML requirements.
  - We may share information to respond to lawful requests and legal processes.
  - We may share information to any government or regulatory authorities permitted under Hong Kong legislation.
  - We may share information to protect the rights and property of the Company, our agents, customers, and others. This includes enforcing our agreements, policies, and terms of use.
  - We may share information in an emergency. This includes protecting the safety of our employees and agents, our customers, or any person.
- **Professional Advisors and Service Providers.** We may share information with those who need it to do work for us. These recipients may include third party companies and individuals to administer and provide the Service on our behalf including but not limited to:
  - account opening and maintenance, including Know-Your-Client processing;
  - AML/CFT service providers;
  - trade execution and monitoring, including market surveillance;
  - artificial intelligence and other algorithm based tools;
  - lawyers, bankers, auditors, and insurers;
  - customer support vendors;
  - Security service providers;
  - Data hosting service providers;
- **Advertising Partners.** Through our Services, we may allow third party advertising partners to set Technologies and other tracking tools to collect information regarding your activities and your device (e.g., your IP address, mobile identifiers, page(s) visited, location, time of day). We may also combine and share such information and





other information (such as demographic information and past purchase history) with third party advertising partners. These advertising partners may use this information (and similar information collected from other websites) for purposes of delivering targeted advertisements to you when you visit third party websites within their networks. This practice is commonly referred to as “interest-based advertising” or “online behavioral advertising. We may allow access to other data collected by the Services to share information that may be useful, relevant, valuable or otherwise of interest to you. If you prefer not to share your personal information with third party advertising partners, you may follow the instructions below.

- **Other.** You may permit us to share your personal information with other companies or entities of your choosing. Those uses will be subject to the privacy policies of the recipient entity or entities.

We may also share aggregated and/or anonymized data with others for their own uses.

## INTERNATIONAL DATA TRANSFERS

All information processed by us may be transferred, processed, and stored anywhere in the world, which may have data protection laws that are different from the laws where you live. We endeavor to safeguard your information consistent with the requirements of applicable laws.

If we transfer personal information to countries outside the Hong Kong or such other jurisdiction we are obliged to comply with, we will put in place appropriate safeguards to ensure that this transfer complies with the applicable laws and regulations. For more information about these safeguards, please contact us as set forth below.

## DATA RETENTION

We store the personal information we receive as described in this Privacy Policy for as long as you use our Services or as necessary to fulfill the purpose(s) for which it was collected, provide our Services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws.

## HOW INFORMATION IS SECURED



We retain information we collect as long as it is necessary and relevant to fulfill the purposes outlined in this privacy policy. In addition, we retain personal information to comply with applicable law where required, prevent fraud, resolve disputes, troubleshoot problems, assist with any investigation, enforce our Terms of Use, and other actions permitted by law. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymize your personal information (so that it can no longer be associated with you) in which case we may use this information indefinitely without further notice to you.

We employ industry standard security measures designed to protect the security of all information submitted through the Services. However, the security of information transmitted through the internet can never be guaranteed. We are not responsible for any interception or interruption of any communications through the internet or for changes to or losses of data. Users of the Services are responsible for maintaining the security of any password, biometrics, user ID or other form of authentication involved in obtaining access to password protected or secure areas of any of our digital services. In order to protect you and your data, we may suspend your use of any of the Services, without notice, pending an investigation, if any breach of security is suspected.

## **YOUR PRIVACY RIGHTS**

In accordance with applicable law, you may have the right to:

1. Access personal information about you consistent with legal requirements including:
  - (i) confirming whether we are processing your personal information;
  - (ii) obtaining access to or a copy of your personal information in a structured, commonly used, and machine readable format; and
  - (iii) receiving an electronic copy of personal information that you have provided to us, or asking us to send that information to another company in a structured, commonly used, and machine readable format (the “right of data portability”).

2. We may charge a fee for processing your request for access. Such a fee depends on the nature and complexity of your access request. Information on the processing fee will be made available to you. We may also take a reasonable period after receiving your correction request to process and update the change.
3. Request correction of your personal information where it is inaccurate or incomplete. In some cases, we may provide self-service tools that enable you to update your personal information or we may refer you to the controller of your personal information who is able to make the correction.
4. Request deletion of your personal information, subject to certain exceptions prescribed by law.
5. Request restriction of or object to processing of your personal information, including the right to opt in or opt out of the sale of your personal information to third parties, if applicable, where such requests are permitted by law.
6. Withdraw your consent to our processing of your personal information.

If you would like to exercise any of these rights, please log into your account or contact us as set forth below. We will process such requests in accordance with applicable laws. To protect your privacy, we will take steps to verify your identity before fulfilling your request.

## INFORMATION CHOICES AND CHANGES

### Accessing, Updating, Correcting, and Deleting your Information

You may access information that you have voluntarily provided through your account on the Services, and to review, correct, or delete it by sending a request to [cs@bg.exchange](mailto:cs@bg.exchange). You can request to change contact choices, opt-out of our sharing with others, and update your personal information and preferences.

### Tracking Technologies Generally

Regular cookies may generally be disabled or removed by tools available as part of most commercial browsers, and in some instances blocked in the future by selecting certain settings. For more information, please see our [Cookies Policy](#).

**CONTACT INFORMATION.** We welcome your comments or questions about this Policy, and you may contact us at: [cs@bg.exchange](mailto:cs@bg.exchange).

**CHANGES TO THIS PRIVACY POLICY.** We may change this privacy policy from time to time to ensure that this policy is consistent with any developments to the way HKBGE uses your personal data or any changes to the laws and regulations applicable to HKBGE. We will make available the updated policy on our website. We encourage you to periodically review this page for the latest information on our privacy practices.

Any modifications to this Privacy Policy will be effective upon our posting of the new terms and/or upon implementation of the changes to the Sites (or as otherwise indicated at the time of posting). All communications, transactions and dealings with us shall be subject to the latest version of this policy in force at the time. In all cases, your continued use of the Sites or Services after the posting of any modified Privacy Policy indicates your acceptance of the terms of the modified Privacy Policy.

## **ELIGIBILITY**

If you are under the age of majority in your jurisdiction of residence, you may use the Services only with the consent of or under the supervision of your parent or legal guardian. Consistent with the requirements of the Children's Online Privacy Protection Act (COPPA), if we learn that we have received any information directly from a child under age 13 without first receiving his or her parent's verified consent, we will use that information only to respond directly to that child (or his or her parent or legal guardian) to inform the child that he or she cannot use the Sites and subsequently we will delete that information.

## **COOKIES**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of the Sites may become inaccessible or not function properly. For more information about the cookies we use, please see our [Cookies Policy](#).

## **CONTACT US**

If you have any questions about our privacy practices or this Privacy Policy, or wish to submit a request to exercise your rights as detailed in this Privacy Policy, please contact us at:

Hong Kong BGE Limited

[cs@bg.exchange](mailto:cs@bg.exchange)

Address: Room 2414-2416, 24th Floor, China Merchants Building, Shun Tak Center, 168-200  
Connaught Road, Sheung Wan, Hong Kong

**Last Update: 4/12/2023**



**WebSite**  
[www.bg.exchange](http://www.bg.exchange)



**Email**  
[cs@bg.exchange](mailto:cs@bg.exchange)



**Adress**  
Unit 2414-16, 24/F, China Merchants Tower, Shun Tak Centre,  
168-200 Connaught Road Central, Hong Kong