



Department:
Policy Owner:
Original Effective Date:

Data Privacy and Protection
Director, Data Privacy and Corporate Policies
December 11, 2023

HONG KONG WEBSITE PRIVACY NOTICE

Effective Date: December 11, 2023, v. 1.0

1. Introduction

GIA Hong Kong Laboratory Limited and GIA Hong Kong Limited (collectively, “GIA Hong Kong,” “we,” “us,” or “our”) respects your privacy. GIA Hong Kong provides this website privacy notice (“Notice”) to describe how we collect, use, disclose, or otherwise process data, including personal data, that we collect about you through our website, <https://hongkong.gia.edu> and other GIA Hong Kong websites on which this Notice is posted (collectively, the “Sites”), our mobile application(s) on which this Notice is posted (the “App(s)”), offline (such as at tradeshows or at GIA Hong Kong locations), and the services available through our Sites, App, and offline (collectively, the Sites, the App, and GIA Hong Kong services offered offline are referred to as our “Services”). We collect data directly from you, automatically as you use our Services, from vendors, and from other individuals, as set forth below.

This Notice does not apply to information, data, or materials collected by third party websites, applications, or social or media platforms (“Platforms”). These Platforms have their own privacy and security practices for which GIA Hong Kong is not responsible. Your use of these Platforms is at your sole risk. We encourage you to read the privacy notices and policies of the respective Platforms before submitting your information. If you use these Platforms to communicate with us, we will use the information we collect from you in accordance with this Notice.

Depending on your relationship with GIA Hong Kong, other privacy notices also may apply to you. For example, if you are accessing the Client Portal or My Laboratory as a client of GIA Hong Kong, then our collection of your personal data is governed by the [Client Privacy Notice](#), not this Notice. If you are a student, then please review the [Student Privacy Notice](#).

GIA Hong Kong is located at the physical addresses set forth below:

GIA Hong Kong Laboratory Limited
Goldin Financial Global Centre, 20/F
17 Kai Cheung Road
Kowloon Bay
Hong Kong

GIA Hong Kong Limited
New World Tower II, 3/F
18 Queens Road
Central
Hong Kong

2. Interpretation and Translation

This Notice has been created, drafted, and prepared in the English language. Subsequently, the English versions have been translated into different languages for convenience. In case of any discrepancy, unless otherwise prohibited by law, the English language version of this Notice controls and governs over any translation of this Notice into any other language.

3. Information We Collect About You

We collect information, including personal data, about you directly from you, from vendors, other parties, and automatically through your use of our Services. We combine the information we collect from these various sources.



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The type of personal data that we collect from you varies based on your particular interaction with our Services as set out below.

- **Account and Registration:** We collect your full name, email address, mailing address, telephone number, and mobile number. You may also provide additional required or voluntary information, where relevant. We also collect information in accordance with GIA Hong Kong's Know Your Customer and Due Diligence Program.
- **Communications:** When you communicate with us, you provide information through our surveys, in the context of a trade show, or otherwise, for example, if you participate in one of our seminars.
- **Request That Your Establishment Be Listed on GIA Hong Kong's Site:** Information about your store and business contact information for a representative of the store is collected. (Note: in this context, someone other than you may provide us with your information if they are listed as the representative of that store).
- **Seek to Find a Store Near You:** Your location information is collected through your IP address in order to locate a store near you.
- **Purchase Items From Our Store:** We collect your full name, contact information, items purchased, billing and shipping information, and payment data. You may also provide additional required or voluntary information, where relevant.
- **Your Usage of Our Services:** Your submission history, inquiries that you submit to us, records of purchases, and other interactions with us.
- **At Trade Shows and Other Events:** We collect information from or about you at trade shows and other events, including at trade shows or other events that we may host or at booths that we may operate. We take photographs and film video at many of our events and use the photographs and videos to share information about our events on social media and other platforms and generally promote GIA Hong Kong's products and services. Accordingly, when you attend our events, your likeness and image may be contained within these photos and videos.
- **User Content:** You may post to the blogs and forums available within our Services. Any information that you post to a publicly facing blog or forum may be viewable by any other visitor to our Sites or App. We are not responsible for the privacy of any information that you choose to post to our Sites or App, or for the accuracy of any information contained in those postings. We cannot prevent such information from being used in a manner that may violate this Notice, the law or your personal privacy.
- **Marketing Communications:** If you sign up or otherwise opt in to receive updates, promotions, or other communications from us, you will need to provide your email address. We use this information to send you updates, promotional communications, and other electronic communications. You may opt out of receiving updates and other emails from us at any time by following the unsubscribe instructions in the applicable email. We may use third-party email providers to deliver these communications to you.

4. Information We Collect Automatically

- **Device and Online Usage:** We collect information about your computer, browser, mobile or other device that you use to access the Services. We may use cookies, pixels, log files and other techniques to collect such information, including IP address, device identifiers and other unique identifiers, browser type, browser language, operating



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system name and version, device name and model, version, referring and exit pages, dates and times you access our Services, the length of time that you are logged in to or using our Services, the links you click or features you use, software crash reports and session identification number. Please see the “Cookies and Other Tracking Technologies” section below or our [Cookie Policy](#) for additional information about our use of cookies.

- **Analytics:** Using service providers, we compile and analyze information derived from the use of our Services, such as aggregate usage patterns, user preferences, and other usage information.

5. Our Use of Your Information

We use your information, including your personal data, for the following purposes:

- **Providing and Improving Our Services:** To provide you with our Services; to improve our Services to enhance your experience using our Services; to respond to your inquiries; to develop new features, products, or services; to authenticate you; to perform technical operations, such as updating software; as well as for other customer service and support purposes;
- **Marketing and Similar Communications:** For marketing and advertising purposes, such as, to the extent permitted by applicable law (and with your consent where required by applicable law) to send you emails and SMS about products, services, and events that we believe would be of interest to you; or to send our newsletter to you;
- **To Solicit Donations;**
- **Personalizing Content and Ads:** To assist us in determining relevant advertising (i) on our Sites and App; (ii) on non-GIA Hong Kong websites and mobile applications; and (iii) through other media;
- **Research and Analytics:** To better understand how users access and use our Services, both on an aggregated and on an individualized basis, including monitoring, evaluating, and analyzing which features and portions of our Site and our Apps are most popular; for troubleshooting; for statistical purposes including identifying geographic regions of visitors to our Services; evaluating frequently asked questions from visitors; and for other statistical purposes;
- **Protecting Rights and Interests:** To protect the safety, rights, property, or security of GIA Hong Kong, the Services, any service provider, or the general public; to detect, prevent, or otherwise address fraud, security, or technical issues; to prevent or stop activity that we consider to be, or to pose a risk of being, an illegal, unethical, or legally actionable activity; to use as evidence in litigation; and to enforce this Notice or our [Terms of Use](#);
- **Sharing with Our Providers:** We may disclose information to our affiliates, respective suppliers and service providers as necessary for us to provide the Site or Services to you and as otherwise required or permitted by applicable law;
- **Legal Compliance:** To comply with applicable legal or regulatory obligations, including as part of a judicial proceeding; to respond to a subpoena, warrant, court order, or other legal process; or as part of an investigation or request, whether formal or informal, from law enforcement or a governmental authority; and



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- **With Your Consent:** With your consent, we may use and share your information in ways not specifically described in this Notice.

GIA Hong Kong may also enhance or merge your personal data with the data that we obtained from the analytics providers referenced above. We will use this information to assist us in our marketing efforts and for the other purposes described in this Notice.

Where required by applicable laws and regulations, we will obtain your consent if we wish to use your personal data for purposes other than those stated in this Notice.

6. Disclosing Your Information

We will disclose your information, including personal data, to entities as described below:

- **GIA Hong Kong's Affiliated Entities:** We will share your information with GIA Hong Kong's affiliated entities and GIA Hong Kong's affiliated entities will use your personal data for the purposes described in this Notice. Please visit [GIA Affiliated Entities](#) for a list of GIA Hong Kong's affiliated entities.
- **Service Providers:** We disclose your personal data to our service providers, contractors, professional advisors, agents, or others who perform functions on our behalf. These service providers include vendors who assist us with sending out email correspondence, SMS messages, payment processors, and other providers consistent with completing your request to GIA Hong Kong.
- **Social Networking Companies:** We disclose your personal data to social networking companies to assist us in determining relevant advertising on such networking websites and through other media. See Online Advertising below.
- **Other Users:** As stated above, you may choose to submit information on a blog or in a forum. Any information that you submit will be available to other users of our Services.
- **General Business Operations:** We disclose personal data where necessary for the administration of our general business, accounting, record keeping and legal functions, to our tax advisors, legal counsel and other professional services entities or agents.
- **Business Transfers:** If we are acquired by or merge with another entity, if some or all of our assets are transferred to another company, or as part of a bankruptcy proceeding, we may transfer the information we have collected from you to the acquiring entity, whose name and contact information will be provided to you upon such transfer where required by applicable law. We also may transfer certain of your personal information to another company in the course of evaluating a prospective transfer, where permitted by law.
- **In Response to Legal Process:** We disclose your personal data to comply with the law, a judicial proceeding, court order or other legal process, such as in response to a subpoena or warrant.
- **To Protect Us and Others:** We disclose your information where we believe it is necessary to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety rights, property, or security of GIA Hong Kong, the Services, or of any person or violations of our Terms of Service or this Notice.



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- **Aggregate and Anonymized Information:** We may share aggregate or anonymized information about use of the Services with service providers for marketing, advertising, research, analytics or other similar purposes. We also may publish reports in the aggregate about usage trends of our Services.

We will put in place appropriate security measures and/or request these third parties to have in place security measures to protect your personal data.

7. Cookies and Other Technologies

We use cookies, web beacons (including clear GIFs), Flash Local Storage Objects (“Flash LSOs”) and similar technologies, including technologies designed for mobile applications, to track user activity and collect usage data about our Sites. We may combine this data with the personal data we have collected from you.

Cookies. Cookies allow a web server to transfer data to a computer for record keeping and other purposes. We and our service providers use “cookies” on our Sites and similar devices designed for mobile applications, to, among other things, better serve you with tailored information and facilitate your ongoing access to and use of the Site. For further information and details about the cookies used on the Services, please see our [Cookie Policy](#). There are two types of cookies: session-based and persistent cookies.

- **Session Cookies.** Session cookies exist only during an online session. They disappear from your computer when you close your browser or turn off your computer. We use session cookies to allow our systems to uniquely identify you during a session or while you are logged in to the Site. This allows us to process your online transactions and requests, and verify your identity, after you have logged in, as you move through our Sites.
- **Persistent Cookies.** Persistent cookies remain on your computer after you have closed your browser or turned off your computer. We use persistent cookies to track aggregate and statistical information about user activity, which may be combined with other user information.

Disabling Cookies. Most web browsers automatically accept cookies, but if you prefer you can edit your browser options to block them in the future. The Help portion of the toolbar on most browsers will tell you how to prevent your computer from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. Visitors to our Sites who disable their web browsers’ ability to accept cookies will be able to browse the Sites; however, certain site features, such as the shopping cart or the ability to find the location of a lab, may not function if you disable cookies.

Local Storage Objects. We may use Flash LSOs in order to store your Site preferences and to support individual applications. Flash LSOs are different from browser cookies because of the amount and type of data stored. In addition, you cannot control, delete or disable the acceptance of Flash LSOs through your browser. For more information on Flash LSOs, or to learn how to manage your settings for Flash cookies, go to the Adobe Flash Player Help Page, choose “Global Storage Settings Panel” and follow the instructions. To see the Flash LSOs currently on your computer, choose “Website Storage Settings Panel” and follow the instructions to review and, if you choose, to delete any specific Flash LSO.

Web Beacons, Pixel Tags and Other Technologies. Our service providers use web beacons in HTML emails to our customers, to help us track email response rates, measure the success of our marketing campaigns, identify when our emails are viewed, and track whether our emails are forwarded.



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Analytics. We work with service providers (including Google Analytics and Flurry) who conduct analytics to help us track and understand how visitors use our Sites. If you prefer not to participate in Flurry, please follow the instructions provided at <http://www.flurry.com>. Google Analytics is a web analytics service provided by Google that uses cookies to help us analyze how users use our Sites. The information generated by the cookies about your use of the services will be transmitted to and stored by Google on servers in the United States. If you access the Sites through different devices, Google may associate your devices with one another. For more information about how Google Analytics uses cookies to measure user interactions, visit <https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>. Google has developed the Google Analytics opt-out browser add-on for the Google Analytics JavaScript (ga.js, analytics.js, dc.js). You can prevent Google's collection and use of the data it collects as defined in its policy by downloading and installing this browser plug-in: <https://tools.google.com/dlpage/gaoptout?hl=en-GB>. For more information about Google Analytics cookies, please see Google's help pages (<https://support.google.com/analytics/answer/6004245>), FAQ on how they use the data (<https://policies.google.com/technologies/partner-sites>), and privacy policy (<https://www.google.com/intl/en/policies/privacy/>).

To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit <http://www.aboutcookies.org> or <http://www.allaboutcookies.org>.

YouTube. Our Sites may use YouTube to make content in video format available to you. By accessing a part of the Sites where videos are available, watching an embedded video, or otherwise interacting with any content made available through YouTube, you signify your agreement with YouTube's terms and conditions. YouTube collects and otherwise has access to usage data (e.g., what videos you accessed and watched) through videos embedded in the Services as further described in YouTube's Privacy Policy. YouTube adheres to Google's privacy policies and principles, part of which allow you to control certain privacy settings and which data are collected. For more information, please visit <https://www.youtube.com/howyoutubeworks/user-settings/privacy/>.

8. Online Advertising

To display more relevant advertising on our Services, to manage our advertising on non-affiliated sites, mobile apps, and online services, and to measure and improve our ads and marketing efforts, we work with Facebook, Google and other non-affiliated ad companies, ad exchanges, channel partners, measurement services and ad networks. Please see the "Cookies and Other Tracking Technologies" section above or our [Cookie Policy](#) for more information. For more information and to exercise your choices please see Facebook's [privacy policy](#) and ad preferences page and/or Google/DoubleClick's [privacy policy, ad settings](#), and [ads help](#) page.

You can also learn more about online advertising [here](#) and opt out of interest-based advertising from many participating ad companies at the ad industry websites, including:

- EU: <http://www.youronlinechoices.eu>
- U.S.: <http://www.aboutads.info>

Similarly, you can learn about your options to opt out of mobile app tracking by certain advertising networks through your device settings. For more information about how to change these settings for Apple, Android or Windows devices, see:



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- Apple: <http://support.apple.com/kb/HT4228>
- Android: <http://www.google.com/policies/technologies/ads/>
- Windows: <http://choice.microsoft.com/en-US/opt-out>

Please note that opting out of advertising network services does not mean that you will not receive any advertising while using our Services or other services, nor will it prevent the receipt of interest-based advertising from non-affiliated parties that do not participate in these programs.

Facebook. For certain Facebook advertising services, Facebook Ireland is a Joint Controller (as defined in the GDPR) and that information required under the GDPR related to such processing can be found at <https://www.facebook.com/about/privacy>. We work with Facebook and use their advertising services to measure and improve our ads and marketing efforts, as well as to display more relevant advertising to you. For further information on how Facebook Ireland processes your personal information, including the legal basis, and the ways to exercise your rights, please visit <https://www.facebook.com/about/privacy>.

Custom Audiences and Matching. We may disclose certain information (such as your email address) with non-affiliated parties such as Facebook (more information on Facebook Custom Audience's may be found [here](#) or see above) so that we can better target ads and content to you, and others with similar interests on these non-affiliated parties' platforms or networks ("Custom Audiences"). We may also work with ad networks and marketing platforms that enable us and other participants to target ads to Custom Audiences submitted by us and others. To opt out of being included in our Custom Audiences going forward, email us at privacy@gia.edu.

9. **Do Not Track.** Your browser or device may include "Do Not Track" settings or functionality. Currently, our systems do not recognize browser "Do Not Track" requests. However, you may disable certain tracking on our Sites, as discussed above (e.g., by disabling cookies), and you may opt out of certain ad networks as described in this Notice. For more information about Do Not Track signals, please click [here](#).

10. Marketing Choices

To the extent permitted by applicable law, we periodically send you electronic communications about GIA Hong Kong's various products, services, or newsletters via email or in selected markets also via SMS, and where required by applicable law to do so we will obtain your prior consent to send marketing communications. You can unsubscribe at any time by sending a request to privacy@gia.edu or where applicable, texting STOP at the number you received the SMS. If you opt out of receiving marketing communications from us, please note that we may still send you email regarding your account, or for any Services you have requested or received from us (e.g., to notify you about the status of a purchase that you have made with us).

11. Links

For your convenience, GIA Hong Kong may provide links to certain non-affiliated websites or referrals to certain non-GIA Hong Kong products or services. If you choose to visit these websites or to use such products or services, please be aware that the third party's privacy policy, and not this Notice, will govern your activities and any information you disclose while interacting with these limited websites. We are not responsible for the information practices of such non-affiliated websites or applications.



12. Security of Personal Data

We take reasonable steps to protect your personal data by using technical, physical and organizational measures that are designed to protect against unauthorized or unlawful use, alteration, unauthorized access or disclosure, accidental or wrongful destruction, and loss. However, no data security measures can guarantee 100% security. We take steps to limit access to your personal data to those persons who need to have access to it for one of the purposes listed in this Notice. You should take steps to protect against unauthorized access to your device and account by, among other things, choosing a robust password that nobody else knows or can easily guess and keeping your login and password private.

13. Retention of Personal Data

As a general matter, we do not retain personal data for longer than is required or appropriate for the purposes for which it was collected, unless a longer or shorter period is necessary for our legal obligations, or customs of the industry, or to defend a legal claim, or to comply with legal, accounting, regulatory or reporting requirements, and consistent with applicable law.

14. Cross Border Transfer of Your Personal Data

Subject to our compliance with applicable laws, including obtaining any consents required by such laws, your personal data may be transferred to countries outside of Hong Kong. GIA take steps to protect personal data, including, where required by law, through appropriate written data processing terms and/or data transfer agreements, for example, by signing relevant standard contractual clauses as approved by local government regulatory authorities. Subject to applicable law, you have the right to obtain details about the mechanism under which your personal data is transferred cross-border. For more information about these transfer mechanisms, please contact us as set out in the "Contact" section below.

15. Rights to Access, Correction, Erasure, and Other Requests: Questions and Complaints

If you have any questions or concerns about GIA Hong Kong's acquisition or use of your personal data, or if you wish to exercise your rights under applicable law in relation to your personal data, please contact us at privacy@gia.edu.

Your rights include the rights to request: (i) access to your personal data and to know what personal data has been collected about you; (ii) a copy of the personal data that we hold about you; (iii) where consent was the basis for the processing of your personal data, withdrawal of that consent; and (iv) the correction of your personal data we have collected about you to the extent it is inaccurate or not up-to-date.

Please note, however, that certain personal data may be exempt from such requests under applicable law, and certain rights may only be exercisable in certain jurisdictions in accordance with applicable law. To the extent the foregoing rights are applicable, we will respond to your requests in the time prescribed under applicable law. If you are unsatisfied with GIA Hong Kong's response to any request, you have the right to file a complaint regarding GIA Hong Kong's use of your personal data.

16. Accuracy

We take commercially reasonable steps to keep your personal data accurate and complete. It is your responsibility to provide GIA Hong Kong with accurate personal data. You should notify us of any changes to your personal data so we



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can ensure the personal data collected is reliable for its intended use. Except as otherwise set forth in this Notice, GIA Hong Kong will only use personal data in ways that are compatible with the purposes (including those purposes directly related to the original purpose) for which it was collected or subsequently authorized by the individual.

17. Updates to this Notice.

GIA Hong Kong may amend this Notice from time to time as laws change; and as our organization, products and services change. The revisions will take effect on the publication date of the amended Notice, as stated, and supersede all previous Notices regarding our privacy practices.

Unless prohibited by applicable law, we reserve the right to amend the Notice at any time, for any reason, without notice to you, other than the posting of the amended Notice at this site.

18. Contact

If you would like to contact us regarding our privacy practices or to exercise your rights, please contact us at:

Attn: Privacy Office
GIA Hong Kong Laboratory Limited
Goldin Financial Global Centre, 20/F
17 Kai Cheung Road
Kowloon Bay
Hong Kong
or via email at privacy@gia.edu

Attn: Privacy Office
GIA Hong Kong Limited
New World Tower II, 3/F
18 Queens Road
Central
Hong Kong
or via email at privacy@gia.edu

Hong Kong Consent

[General consent]

By checking this box, you acknowledge and consent to our collection, storage, use, disclosure, or other processing of your personal data as described in our Privacy Notice **[above] OR [insert hyperlink]**.

[Separate consent for cross-border transfer]

By checking this box, you acknowledge and consent to your personal data being transferred, accessed, stored and otherwise processed by us, our related entities or service providers to or in jurisdictions outside of your home jurisdiction, as described in our Privacy Notice **[above] OR [insert hyperlink]**.