

Privacy Policy for NON-EU Users.

PRIVACY STUFF FOR NON-EUROPEANS.

GGHK Limited ("**GGHK**", "**we**", "**us**" or "**our**") is committed to protecting and respecting the privacy of people we interact with in-person or online in relation to the preparation, organisation and operation of Gay Games 11 and/or any events, programmes, activities, campaigns or competitions related thereto ("**Events**"), including but not limited to those viewing or using our website www.gghk2023.com ("**Website**"), using our applications or APIs (collectively, the "**Apps**"), participating in any research or surveys we carry out, and participating in, attending or interacting with us in relation to any of our Events; but excluding those registering to participate in or attend any Event(s) through Fusesport (as defined below). The protection of your personal information is very important to us, and we understand our responsibilities to handle your personal information with care, to keep it secure and to comply with legal requirements. In the preparation, organisation and operation of Gay Games 11 and any Events related thereto, GGHK will cooperate with the Federation of Gay Games (the "**Federation**") and the Federation's third party vendor, Fusesport, Inc. ("**Fusesport**").

We may collect and process certain personal information about you in relation to the preparation and operation of Gay Games 11 both online and in-person, including but not limited to when you visit, interact with us, or use our Website or our Apps through any channel, when you download applications we make available to you, when you enter lucky draws or competitions, when you sign up for our e-newsletter, or when you participate in, attend or interact with us in relation to in any Events. For the avoidance of doubt, those registering to participate in or attend any Event(s) through Fusesport will not be covered by this privacy policy ("**Policy**"). If you are an athlete, volunteer, official or other participant of Gay Games 11 or its related Events, who has or will register through Fusesport, please carefully read the privacy policy indicated in your registration form.

This Policy has been developed in accordance with the Personal Data (Privacy) Ordinance (Chapter 486) of the Laws of the Hong Kong Special Administrative Region ("**Ordinance**"). The Ordinance provides data subjects with rights to ascertain whether we hold personal data relating to them, to obtain a copy of that data, and to correct any data that is inaccurate. If you are subject to EU laws, please read our privacy policy for EEA users located on our website.

It may be necessary for us to gather information on you for a specific purpose. We will always inform you when we are collecting such information. It is our intention to respect your request for privacy, and we try our best to provide you with communication channels to facilitate this. Once all gathered information has been used for the intended purpose, it is destroyed or de-identified unless this is prohibited by law.

GGHK has created this Privacy Policy in order to demonstrate our firm commitment to protecting your privacy. The following discloses our information gathering methods and dissemination practices in relation to the preparation, organisation and operation of Gay Games 11 and its related Events. GGHK is not responsible for the privacy practices of other linked sites. While you are using our Website and/or Apps, you may be redirected to Fusesport's website. In such an event, you will be subject to the Federation's privacy policies, which may differ from this Privacy Policy. Please read those privacy policies carefully.

USE OF YOUR PERSONAL INFORMATION.

GGHK collects certain personal information from you, which may include information you provide when you visit or use our Website and Apps, such as your contact information (e.g., name, e-mail or street address, phone number etc.) and demographic information (e.g., age, country of residence, preferred language etc.). This information is used by us to further our objectives. Contact information from online or hardcopy forms is used to send promotional materials and information to you. If data collected is to be displayed at a later date, due care will be given to keep it anonymous and you will be advised in advance. Demographic information is used for our research requirements and to tailor your experience at our site, showing content of interest, and displaying the content according to your preferences. We may share with our advertisers, sponsors and partners such information on an aggregate basis. You may opt out from receiving future mailings.

If you visit or use our Website/Apps, our server software records the domain name of your computer. We may also track the pages you visit. We do these things so that we can measure traffic, gauge the popularity of various parts of the Website, gain some general knowledge about our audience and compile aggregated statistics. We may also use cookies to collect information on how you use the Website. If you refuse cookies, certain features of this Website may not be available to you. For further information, please refer to our Cookies Policy.

Data collected by GGHK is used only for the specified purposes indicated above and will not be disclosed to any third party except as set out in the Personal Information Collection Statement below.

DATA SECURITY.

GGHK will take reasonable steps to ensure that all information we collect, use or disclose is accurate, complete, up-to-date and stored in a secure environment accessed only by authorised persons. However, we give no warranty against third parties hacking into the data or any unauthorised access to the data by anyone.

OPT-OUT.

You can opt out from receiving information from us or to delete your information from our records at any time should you no longer wish to receive updates concerning our events, activities and promotions. To opt out, please send us an email: privacy@gghk2023.com or click the "unsubscribe" button on the Website and/or Apps.

PERSONAL INFORMATION COLLECTION STATEMENT.

It may be necessary for you to provide us with your personal data in order for us to prepare, organise and operate Gay Games 11 and its related Events, including but not limited to when you visit, interact with us, or use our Website or our Apps through any channel, when you download applications we make available to you, when you enter lucky draws or competitions, when you sign up for our e-newsletter, or when you participate in, attend or interact with us in relation to any Events. For the avoidance of doubt, those registering to participate in or attend any Event(s) through Fusesport will not be covered by this Policy ("**Policy**") and Personal Information Collection Statement. If you are an athlete, volunteer, official or other

participant of Gay Games 11 or its Events, who has or will register through Fusesport, please carefully read the privacy policy indicated in your registration form.

If your personal data is incomplete or incorrect, we may not be able to provide or continue to provide services to you, including (a) allowing you to register or enter lucky draws and competitions, participate in and attend any of our Events or otherwise engage with GGHK, and (b) allowing us to process your registration or respond to your enquiries and feedback. We shall keep your personal data confidential at all times. Our policies and practices with respect to the collection, use, retention, disclosure, transfer, security and access of personal data will be in accordance with requirements under the Ordinance and this Personal Information Collection Statement. We may from time to time collect your personal data specifically for the purpose of Events organised or promoted by us.

- **Types of Personal Information that we Collect:**

We may collect certain personal information from you in relation to the preparation, organisation and operation of Gay Games 11 both online and in-person, including when you visit, interact with us, or use our Website or our Apps through any channel, when you download applications we make available to you, when you enter lucky draws or competitions, when you sign up for our e-newsletter or participate in, attend or interact with us in relation to any of our Events. This includes:

- *contact details and basic user information including your name, age, gender identity or preferred gender category, email address, telephone number, country of residence, travel history, and past and intended Gay Games attendance information;*
- *your marketing preferences including interests and market list assignments, marketing objections, preferred language, website or app data;*
- *usage information including how you use our Website or applications such as clicks and which pages have been shown to you, referring webpage address;*
- *device data and log information including IP addresses, device ID and type, and details about your use of our website, app, browsing history, search queries, browser type, session frequency, geolocation information, wireless and mobile network connection information; and*
- *cookies and tracking technologies including technologies cookies and web beacons and advertising IDs (more information about use of cookies can be found in our Cookies Policy).*

We will permit you to provide the following special categories of personal data on a voluntary and optional basis on the basis of your consent:

1. *Health data; and*
2. *Religion.*

- **How we Collect Personal Information:**

Your personal information is collected by us either directly (for example, when you use our Website and Apps, enter lucky draws or competitions, sign up for our e-newsletter, download our applications, or participate in, attend or interact with us in relation to any of our Events). For the avoidance of doubt, those registering to participate in or attend any Event(s) through Fusesport will not be covered by this Policy. If

you are an athlete, volunteer, official or other participant of Gay Games 11 who has or will register through Fusesport, please carefully read the privacy policy indicated in your registration form.

You are under no obligation to provide the personal information when we seek to directly collect it from you. However, if you do not provide us with certain information marked as mandatory or with an asterisk on the relevant online or hardcopy forms, we may not be able to provide or continue to provide services to you, including (a) allowing you to register or enter lucky draws and competitions, participate in and attend any of our Events or otherwise engage with GGHK, and (b) allowing us to process your registration or respond to your enquiries and feedback.

We may receive information about you indirectly from other sources and combine such information with information we collect directly from you where this is necessary to help manage our relationship with you. These other sources may include third party software applications, advertising technologies, and social media platforms such as Facebook, Instagram, Twitter, WeChat, YouTube and Weibo. We may also use other social media platforms in the future.

If you provide us with information about other individuals, you must tell those individuals and let them know where they can find a copy of this Privacy Policy.

- **Purposes for which personal data are collected and used:**

We may use the data collected and provided by you for one or more of the following purposes:

- *to create profiles, maintain records and to communicate with you, fulfil your requests and respond to your enquiries and feedback;*
- *to organise, prepare and operate Gay Games 11 and any events, programmes or activities related thereto;*
- *to enhance and promote campaigns, appeals, activities and events arranged by or on behalf of us and/or the Federation;*
- *to inform you (subject to your consent) of campaigns, appeals, activities and events relating to Gay Games 11 in accordance with the "Direct Marketing" section below;*
- *to send you important notices or personalised messages;*
- *to administer the operation of our Website and Apps, to allow you to use the services and functions of our Website, to conduct website maintenance, to troubleshoot problems, and to continually improve your Website and App experience and improve our products and services;*
- *to provide services in connection with registration and participation for our Events;*
- *to identify you for entry into lucky draw or any other promotional activities;*
- *to contact you regarding your enquiries, notify you of the results of lucky draw/ promotional activities and the subsequent presentation or redemption arrangement;*
- *for announcement and publicity of lucky draw/ promotional activities' result;*
- *for marketing and promotion purposes;*
- *for identification and verification purposes;*
- *for our own internal records, research and statistical purposes;*

- *complying with applicable laws, regulations, court orders or orders of a government or regulatory body (in Hong Kong or elsewhere);*
- *transferring your personal data to any place outside Hong Kong for any of the above purposes; and*
- *for any other purpose pertaining to Events.*

You are not required to provide the data. However, if you do not provide us with certain information marked as mandatory or with an asterisk on the relevant online or hardcopy forms, we may not be able to provide or continue to provide services to you, including (a) allowing you to register or enter lucky draws and competitions, participate in and attend any of our Events or otherwise engage with GGHK, and (b) allowing us to process your registration or respond to your enquiries and feedback.

Please note that we are not required to comply with the provisions of the Data Principle 1(3) under the Ordinance in respect of any subsequent collection personal data from you if:

- *the subsequent collection would be to repeat, without any material difference, what was done to comply with that principle in respect of the first collection; and*
- *no more than 12 months have elapsed between the first collection and subsequent collection.*

We will not, however, use your personal data for a new purpose without your prescribed consent.

- **Data Security**

The data you provide to us will be stored at our office or servers of our agents in Hong Kong and the United States accessible only to our authorised employees and contractors and those to whom we give access. However, we give no warranty against third parties hacking into the data or any unauthorised access to the data by anyone.

GGHK will take reasonable steps to ensure that all information we collect, use or disclose is accurate, complete and up-to-date. You have the right (subject to various exceptions and in accordance with the Ordinance) to access certain personal data held by us about you and correct any inaccuracies. If you make a request to access your personal data, we will provide you with a copy of your data within a reasonable time and a non-excessive fee may be charged for complying with your request. If you wish to access or correct your personal data, please contact us using the contact details are set out below.

We may share your personal data with sponsors of Events or authorised agents or contractors for prize presentation, redemption or delivery (as appropriate) in connection with the associated Event. By entering the competition or promotion, you acknowledge and expressly agree with the above.

DIRECT MARKETING.

Where you have given your consent and have not subsequently opted out, we may use your personal data, including your contact information and demographic information, to send marketing and promotional materials (such as electronic newsletters, promotional flyers and other communication media) to you and/or contact you in relation to campaigns, appeals, activities and events arranged by or on behalf of us. For example, we may send or show you updates on our Events and our sponsors by post, telephone or online (including by email or through your mobile phone). You may at any time require us to cease to use your personal data for direct marketing purposes.

TRANSFER OF DATA.

The personal data you provide will be kept confidential but for the purposes set out above and, subject to applicable law, may be transferred to the following parties:

- *our subsidiaries, holding companies, associated companies or affiliates, and the Federation, its designees, or affiliated foundations;*
- *our partners and vendors for the purpose of facilitating and analysing the Gay Games events;*
- *any agent (including the Federation), employee, contractor, third party service provider or volunteer who provides general administration, data processing, telecommunications, computer, payment, call center, mailing, printing, research, medical, marketing and/or survey services to us and who has a duty of confidentiality to us;*
- *any other person or company who is under a duty of confidentiality to us, its members and any of their subsidiaries, holding companies, associated companies or affiliates and who has undertaken to keep such information confidential;*
- *any person(s) as required under applicable laws, regulations, court orders or orders of a government or regulatory body (in Hong Kong or elsewhere); and*
- *any person(s) with a right under the Ordinance to gain access to such data.*

We may transfer your personal data outside Hong Kong to any jurisdiction where there may be in place data protection laws which are substantially similar to, or serve the same purposes as, the Ordinance. This means your personal data may not be protected to the same or similar level as in Hong Kong.

RETENTION OF DATA.

We will keep your personal data only for as long as necessary to fulfil the purpose for which it is being collected. We may also retain archived personal data for statistical purposes. Your information that is no longer needed is either irreversibly anonymised or securely destroyed. In some circumstances we may retain your personal information for longer periods of time. Such circumstances may include but are not limited to where we are required to do so to meet legal, regulatory, tax or accounting requirements. Please note that we are not liable in an action for damages at the suit of other data users in respect of such erasure.

YOUR CONSENT.

By submitting any online or hardcopy form, you certify that all information provided to us in the form is true and correct. You agree that the personal data given by you and collected by us from time to time may be used and disclosed for the foregoing purposes, and to such persons as may be appropriate in accordance with this Personal Information Collection Statement and this Privacy Policy.

This Personal Information Collection Statement and this Privacy Policy are subject to change without prior or separate notification. Any changes will be posted to our Website.

CONTACT.

For enquiries, you may contact us at:

Full name of legal entity: **GGHK Limited**

Email address: privacy@gghk2023.com

Postal address: **Suite 701, 7/F, The L Plaza, 367-375 Queen's Road Central, Hong Kong**

Last updated May 2021