

# PRIVACY POLICY

Introduction and Who We Are

FUKKOL Incorporated Kalen International Ltd. ("we," "us," and "our") has its principal place of business in the State of Hong Kong China. We collaborate with and may use the services of third parties, including cloud service providers and other vendors located around the world to provide services to us and you. We respect the importance of the privacy of your personal information. We provide this Privacy Policy so you know about our information handling and storage practices and understand how we treat the personal information we receive about you whether from your use of the <u>fukkol-lube.com</u> website (the "Site"), receipt of our newsletter, or otherwise in connection with our products and services. By using, browsing, or accessing the Site, electing to receive our newsletter, or contacting us in connection with our products or services, you agree to the terms of this Privacy Policy.

Your visit to the Site and any dispute over privacy is subject to the <u>Terms of Use</u>, including limitations on damages and application of the law of the State of Hong Kong China. Use of this Site is strictly voluntary. If you do not agree to this Privacy Policy and Terms of Use of this Site, you must immediate log off the Site and may not use the Site. Additionally, we may not be able to assist you in connection with matters relating to our products or services.

Your Consent

BY SUBMITTING YOUR PERSONAL INFORMATION TO US, YOU ARE CONSENTING TO THE COLLECTION AND PROCESSING OF YOUR PERSONAL INFORMATION IN THE HONG KONG AND TO OUR USE OF YOUR PERSONAL INFORMATION AND ANY RELATED INFORMATION IN THE MANNER DESCRIBED IN THIS PRIVACY POLICY, INCLUDING THE TRANSMISSION TO, AND STORAGE AND PROCESSING OF YOUR PERSONAL INFORMATION BY THIRD PARTIES OUTSIDE THE UNITED STATES. IF YOU ARE SUBMITTING PERSONAL INFORMATION OF THIRD PARTIES TO US, YOU WARRANT AND REPRESENT YOU HAVE THEIR CONSENT TO PROVIDE THEIR PERSONAL INFORMATION TO US AND YOU WILL INDEMNIFY US AND HOLD US HARMLESS FROM AND AGAINST CLAIMS BY SUCH INDIVIDUALS RELATING TO OUR PROCESSING AND USE OF SUCH PERSONAL INFORMATION WITHIN THE TERMS OF THIS PRIVACY POLICY.

### The Data We Collect

In general, you can browse the Site without telling us who you are or revealing any personal information about yourself. However, we collect your computer's or mobile device's IP address, which you necessarily disclose when you visit the Site, so that data (such as the web pages you request) can be sent to your computer or device. The Site utilizes "cookies," which are text files placed on your computer that web pages on the Site may use to store data on your computer or send data to our web server. We may use cookie data to "recognize" you when you visit the Site in the future, to troubleshoot how the Site operates, and for internal analysis of how people use the Site. Should you decide not to accept cookies from the Site, you will limit the functionality we can provide when you visit and use the Site. We may use standard Internet technology, such as web beacons and other similar technologies, to track your use of the Site.

When you engage in certain activities on the Site, such as signing up to receive our newsletter, purchasing products on the Site (where permitted under our policies), or providing feedback on the Site or in connection with the receipt of our newsletter or in relation to the purchase or use of our products and services, we may ask you to provide personal and other information. In order to engage in such activities you will be required to provide information that lets us know the specifics of who you are, such as your first name, last name, mailing address, zip or postal code, e-mail address, credit card, and other information. If such information is required to provide services to you or where it is optional for you to engage in these activities, if you do not provide the mandatory data with respect to a particular activity, you may not be able to engage in that activity, we may not be able to assist you in connection with our products or services or fulfill the purpose for which you contacted us, or you may limit your ability to use all or a portion of the Site.

# Use of the Data We Collect

We use personal information to provide and improve our products and services, including the Site, for purposes in our legitimate interests and for compliance with applicable laws.

We process personal information on the basis that it is: (a) necessary for the performance of a contract we have with you; (b) in our or a third parties' legitimate interests such as a contract with your employer under which we are required to deliver products or services; (c) where you give us your consent; or (d) for compliance with a legal obligation.

We may use your IP address to: (a) help diagnose problems with the Site, administer and improve the Site, and measure the use of the Site; (b) identify the type of web browsers used, the pages viewed, the web sites from which a visitor found this Site, and the search terms and search engines used to find this Site; and (c) gather other web analytics information relating to visitors' use and navigation of the Site. This information does not identify you personally. On occasion we may aggregate this data with data on the pages visited by other users to track overall visitor traffic patterns and provide this aggregate information to vendors, business partners, or affiliates.

The information we obtain using standard Internet technology, such as web beacons and other similar technologies, enables us to customize the services we offer visitors to our Site, to deliver targeted content and advertisements, and to measure the overall effectiveness of our online content, advertising, or programming. We may use your personal information for particular activities, including, without limitation, customer service, credit card processing, processing your order, collections, marketing and research, developing and displaying content and advertising tailored to your interests, providing product, promotional and other information to you, and to contact you regarding administrative notices. We may share this information with distributors, marketing partners, and advertisers, with whom we collaborate. We must release your credit card information to credit card authorization service providers and associated banks to process your payments for products or services purchased on this Site. In addition, if we use service providers, these service providers may have access to your personal information to perform contractually specified services on our behalf.

We may use the information you provide in an anonymous or aggregated format that does not identify you personally, which uses might include, without limitation, to evaluate existing products, services, and systems; to assist in the development of new products or services; research; advertising; and to identify trends and changes.

We may disclose personal information in any of the following circumstances: (a) in response to a subpoena, search warrant, court order, or other legal process or request, or as may otherwise be required by law, rule, or regulation; (b) to protect and defend our rights or property or those of our affiliates or business partners, or others; or (c) as we, in our sole discretion, believe is appropriate under exigent circumstances in response to a perceived threat to the personal safety, property, or rights of any person or organization.

In addition, since our database is a business asset, in the event we are reorganized or become part of another organization, you consent to the sale, assignment, or transfer of your personal information to a successor that acquires substantially all of our business assets, or to an affiliate, as applicable.

#### Security and Accuracy of Personal Information

We take the security of personal information seriously and we take what we believe to be reasonable precautions and have implemented certain safeguards to protect the security of data and personal information. We may transmit your personal data to third parties outside the Hong Kong for storage or processing. We will attempt to ensure that your personal information will be subject to appropriate safeguards and that it is processed and secured in accordance with applicable law. However, we cannot guarantee against any loss, misuse, unauthorized disclosure, or alteration or destruction of data or personal information. While we strive to protect your personal information, we cannot guarantee the security of any information you transmit to or from the Site, by email or otherwise, and you provide such information at your own risk. You acknowledge that: (a) there are security and privacy limitations in computer systems and on the Internet which are beyond our control; (b) the security, integrity, and privacy of any and all information and data exchanged between you and us through the Site, including personal information, cannot be guaranteed; and (c) any such information and data may be viewed or tampered with by a third party while such information or data is being used, transmitted, processed, or stored. Data collected will be kept accurately, and kept up to date, if applicable. Any errors in data will be rectified as soon as the error becomes known to FUKKOL. If you become aware of an error, please notify us using the Contact Us form with "Website" selected as the subject.

#### Our Relationship to Other Websites

This Site may contain links to other websites. If you visit one of these other websites, we encourage you to review the privacy policy on that website.

We may have functionality on the Site that is provided, in whole or in part, by a third party service provider. You can usually identify such third party functionality by the use of a trademark not owned by us on or near the functionality. In that case, when you use the functionality, you become subject to the terms of use and privacy policy of this third party in addition to the Privacy Policy and Terms of Use of our Site. In some cases, you may need to visit that party's web site and locate the terms of use and privacy policy.

This site uses Google Analytics and YouTube. To find out more about how Google and YouTube use data when you use our site, please visit www.google.com/policies/privacy/partners/.

How Long Do We Keep Personal Information

We retain personal information in accordance with any records retention policy or program we may implement from time to time. We will retain personal information for the length of time necessary to fulfill the purposes for which we collected the personal information or to demonstrate we have fulfilled our duties or obligations, or retention periods required by applicable law or in which claims may be made or the existence of legal proceedings.

# Your Rights

You may have rights under applicable laws concerning personal information we have collected about you, which may include the right to access your personal information we have, to ask us to delete, correct, or restrict the use of your personal information, to withdraw your consent to our use of your personal information, to ask how we have used your personal information, and to ask whether we have shared your personal information. We will honor your rights under any such laws as applicable to us or as we may agree to honor in our sole discretion.

# Use of Site By Minors

This Site is not directed to individuals under the age of sixteen (16) and we do not knowingly collect personal information from individuals under 16. If you are under 16 and believe you have submitted personal information to us, you may ask us to remove that information by contacting using one of the methods described in the "Privacy Requests" section as shown below.

# Changes to Privacy Policy

We reserve the right to revise this Privacy Policy, in whole or in part, at any time without notice to you. You expressly waive any right to receive notice of any revisions to this Privacy Policy. We encourage you to review this Privacy Policy regularly in your use of the Site to ensure you are aware of current practices. Any use of the Site following the date on which the revised Privacy Policy is published on the Site shall constitute your acceptance of all such changes.

### Privacy Requests

The easiest way to stop receiving our newsletter is to click "unsubscribe" on the bottom of the newsletter email. All privacy requests, including those related to access to, rectification of, restriction of, processing of, sharing of, or objection to the processing of your personal information, withdrawal of consent to handle your personal information, or the right to be forgotten can be submitted one of the following ways:

By phone: 852 24202444

By U.S. Mail: KALEN INTERNATIONAL LTD. Room 601, New Treasure Centre, 10 Ng Fong Street,San Po Kong ,Hong Kong.

All communications must be in the English language.

If you send us an email requesting that we take action regarding your personal information or the right to be forgotten, the requesting email MUST come from the email address we have on file for you in order to verify that the request is valid and also to protect your personal information. All other requests must be verifiable as originating from you or your authorized representative. In order to protect your information and because people may have the same name, we will only provide or delete personal information where we can reasonably identify the identity of the requestor. For your protection, we may ask you for additional information to verify your identity. In most cases, we will provide the access you request and correct or delete any inaccurate personal information you discover. We reserve the right, however, to limit or deny your request to the extent permitted by applicable law if: (a) the disclosure may be a threat to the personal safety, property, or rights of any other person or organization; (b) the disclosure may lead to a violation of applicable laws or regulations; or (c) where you have failed to provide sufficient evidence to verify your identity. Even after a request, we may also keep personal information where necessary to comply with applicable laws or where necessary to protect a legal right or fulfill a legal obligation.

#### Contact

For questions or comments related to the Site or this Privacy Policy, please email us using the <u>Contact Us form</u>.