

HK Privacy Policy

Privacy Policy

Last modified:

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Gate Digital Limited (“[Gate.HK](#),” “we,” or “us”) is subject to the legal requirements under the Personal Data (Privacy) Ordinance (Cap. 486) of the laws of Hong Kong. This Privacy Policy describes how we may collect, use, disclose, and protect information about you. This Privacy Policy applies to information we collect when you access or use our website, mobile application, products, and services, or otherwise interact with us (such as through customer support channels) (collectively, our “Services”). This Privacy Policy applies to current and former accountholders and others using our Services.

We may change this Privacy Policy from time to time. If we make changes, we will notify you by revising the date at the top of this Privacy Policy. We may also provide you with additional notice, like adding a statement to our website or sending you a notification. We encourage you to review this Privacy Policy regularly to stay informed about our practices and the choices available to you.

1. The Personal Data We Collect

In connection with using our Services, we may collect certain information about you:

- We collect information that you provide to us directly when, for example, you create an account, initiate a transaction, or communicate with us through support tickets.
- We also automatically collect certain information about your interactions with our Services.
- We may also collect information from third parties. For example, we may collect information from risk-related service providers that help us verify your identity and detect potential misuse of our Services. We may also collect information from advertising networks and/or data analytics providers.

The categories of information that we may collect include:

- **Personal Information:** Information such as your name, gender, mailing address, photographs, utility bills, date of birth, nationality, e-mail address, telephone number, government identification number, government-issued identification document (e.g., driver's license or passport), and any other information we may need to collect and/or verify pursuant to our internal policies and regulatory obligations.
- **Financial Information:** Information about your account at financial institutions (e.g. account number, account type, and amount of asset) source of wealth, source of funds and credit history.
- **Transaction Information:** Information such as the transaction amount, transaction history, the type, the sending or receiving financial institution, the sending or receiving blockchain address, and information about the counterparty to the transaction.
- **Investment Information:** Information such as your risk tolerance, risk appetite, investment objectives and experience.
- **Employment Information:** Information such as your job title, employer, and salary.
- **Entity Information:** Information such as your entity's name, Employer Identification Number, proof of formation (e.g., articles of incorporation), and beneficial owners.
- **Risk-Related Information:** Information such as the outputs generated by identity, anti-fraud, sanctions compliance, and anti-money laundering screening efforts.
- **Device and Usage Information:** Information such as the device and network you use, hardware model, operating system version, IP address, unique device identifiers, browser type, and mobile application version. We may also collect information about your activity on our Services, such as access times, pages viewed, links clicked, and the page you visited before navigating to our Services.
- **Location Information:** In accordance with your device permissions, information such as the precise location of your device. We also may collect geolocation data that is inferred from **Device and Usage Information**.
- **Correspondence Information:** Information such as your communications with our customer support and your responses to surveys or questionnaires.
- **Audio or Visual Information:** Information such as audio or video recordings from your contacts with us.
- **Information Collected by Cookies and Similar Tracking Technologies:** Through the use of tracking technologies, such as cookies and web beacons, information about your interactions with our Services and across the web and in mobile applications, including IP addresses, web browsers, mobile network information, pages viewed, time spent on pages or in mobile applications, links clicked, and conversion information.

- Cookies are small data files stored on your hard drive or in device memory. Web beacons (also known as “pixel tags” or “clear GIFs”) are electronic images that we use on our Services, including in our emails, to help deliver cookies, count visits, and understand usage and campaign effectiveness.
- For more details about how we use these technologies, please see the **Analytics** section below for details. You may limit our use of cookies and similar technologies at any time (see the **Your Choices** section below for details).
- **Other Information**: Any other information that you choose to provide or that we request.
- The above categories of information are collectively referred to as **Personal Data**. In addition to the categories that were previously described, we may also generate aggregated or de-identified information that cannot reasonably be used to identify you. Where information cannot reasonably be used to identify you, we do not consider it to be Personal Data.

2. How We Use and Share Your Personal Data

2.1 Everyday Business Activities

We use and share the information we collect about you in connection with what we consider our **Everyday Business Activities**, which may include using information about you to:

- **Provide Our Services to You**: including to establish and maintain your account with us; process your transactions; communicate with you regarding your account and your transactions; send you technical notices and security alerts regarding our Services; respond to your inquiries; and personalize your experience while using our Services.
- **Operate Our Business**: including to operate our Services; provide, maintain, improve, and develop new Services; and monitor and analyze trends, usage, and activities in connection with our Services.
- **Protect Ourselves, Our Users, and Others**: including to address actual or potential security incidents; address actual or potential transactions or activity that may be malicious, deceptive, fraudulent, illegal, or violate the terms of our agreements or policies; resolve inquiries or disputes; control our risks; and otherwise protect our rights and property or the rights and property of others.
- **Comply with Legal and Financial Obligations**: including to operate our compliance programs (e.g., anti-money laundering and sanctions-compliance programs); and in accordance with, or required by, any applicable law or legal process, including lawful requests by national, state, local, or foreign government authorities.
- **Facilitate a Business Transaction**: including in connection with, or during negotiations concerning, any merger, sale of company assets, financing, or acquisition of all or a portion of our business by another company.

- **Other Expected Purposes:** in connection with any purpose expressly described at the time of collection or any purpose that is reasonably expected based on the context or in light of a term in our agreements with you.

2.2 Marketing Activities

With your permission, we may use and share your information to communicate with you to promote our Services to you. We refer to this type of activity as **Marketing Activities** throughout this Privacy Policy. You may opt out of receiving marketing communications at any time (see the **Your Choices** section below for details).

3. Who We Share Your Personal Data With

In connection with our **Everyday Business Activities** and in connection with **Marketing Activities**, we may share your Personal Data with various third parties. These parties may include:

- Our contractors, vendors, and service providers, such as companies that assist with identity verification, anti-money laundering or sanctions compliance, fraud monitoring, customer service, and web hosting;
- Associated entities of [Gate.HK](#);
- Professional advisers, including attorneys, accountants, consultants, and auditors;
- Other financial institutions;
- Analytics providers;
- Advertising networks;
- National, state, local, or foreign government authorities, including regulators, law enforcement authorities, and tax or unclaimed property authorities;
- Other third parties where the sharing carries out our **Everyday Business Activities** and such sharing is in accordance with, or required by, any applicable law or legal process; and
- Third parties and their professional advisors involved with any actual or potential merger, sale of company assets, financing, or acquisition of all or a portion of our business by another company.

If in the future we have affiliates, we may share your information with our affiliates but only in connection with our **Everyday Business Activities**. Also, if you consent, we may share your information with the third party that you agreed to provide your information to.

4. Analytics

We engage others to provide analytics services and serve advertisements across the web and in mobile applications. These entities may use cookies, web beacons, device identifiers, and other technologies to collect information about your use of our Services and other websites and applications, including your IP address, web browser, mobile network information, pages viewed, time spent on pages or in mobile applications, links clicked, and conversion information.

The information collected by these technologies may be used by us and others in connection with our **Everyday Business Activities** and **Marketing Activities** to among other things, better understand your online activity, determine the popularity of certain content, deliver advertising and content targeted to your interests on our Services and other websites, provide customer support, protect your account from fraud, and deliver a better and more streamlined experience.

We provide information on how to limit our use of these technologies in the **Your Choices** section below.

5. Your Rights and Choices

5.1 Opting Out of Marketing Communications

You may opt out of receiving marketing communications from us by following the instructions in those communications, managing your account settings, or submitting a request to privacy@gate.hk. If you opt-out we may still send you non-promotional emails, such as those about your account or our ongoing business relations.

5.2 Account Information

If you have an active account with us, you may update and correct certain account information by logging into our website and visiting your account profile page. In some cases, we may require you to contact us at the locations identified in the **Contact Us** section below in order to update or correct your information. We may require you to provide additional information or documentation to verify your proposed changes.

If you no longer have an active account, you may update or correct your information by contacting us by email at privacy@gate.hk.

5.3 Cookies and Similar Technologies

Most web browsers are set to accept cookies by default. If you prefer, you can often adjust your browser settings to remove or reject browser cookies. Please note that removing or rejecting cookies could affect the availability and functionality of our Services.

Other ways to limit or block our use of cookies and similar technologies include:

- **Blocking Advertising ID Use in Your Mobile Settings:** Your mobile device settings may provide functionality to limit use of the advertising ID associated with your mobile device for interest-based advertising purposes.
- **Using Privacy Plug-ins or Browsers:** You can block our websites from setting cookies used for interest-based ads by using a utility that blocks third-party cookies/trackers and configuring it to do so.
- **Advertising Industry Opt-Out Tools:** You can also use these opt-out options to limit use of your information for interest-based advertising by participating companies:
 - Digital Advertising Alliance: <https://optout.aboutads.info>
 - Network Advertising Initiative: <https://optout.networkadvertising.org>

5.4 Mobile Push Notifications

With your permission, we may send push notifications to your mobile device. You can deactivate these messages at any time by changing the notification settings on your mobile device.

5.5 Enquire on Personal Data Maintained with Us

Please submit a request to privacy@gate.hk should you wish to enquire whether we hold your Personal Data. You may also request to obtain a copy of your Personal Data maintained with us. In your enquiry on your Personal Data, a reasonable amount of fee for processing the data access request may be incurred.

The request must be submitted along with the following information:

- Name
- Contact number
- E-mail address
- Account details

5.6 Ascertain Our Personal Data Policies and Practices

Our Privacy Policy has been uploaded to the Site. You may visit the latest information on the Site from time to time.

6. Security of Information

We may store, process and/or transfer the Personal Data to jurisdictions out of Hong Kong. By browsing the Site or using the Services, you agree with us to transfer your data to jurisdictions out of Hong Kong.

While we ultimately cannot guarantee that our Services are 100% secure, we use reasonable physical, electronic, and procedural safeguards to protect your Personal Data from unauthorized access and use. For example, the safeguards we may take include SSL encryption, a proper firewall, and strict physical and digital access restrictions.

The safety and security of your information also depends on you. When you choose a password for access to your account, you are responsible for keeping this password confidential. Do not share your account password (or the password for the email address that you used to register the account) with anyone. You should use a complex password. We also may provide you with additional security features, such as two-factor authentication, and we strongly recommend that you utilize these features.

7. Age Restrictions

Our Services are restricted and not intended for anyone under the age of 18. Moreover, we do not knowingly collect Personal Data from anyone under the age of 18. We will take appropriate steps if we encounter information collected from an individual under the age of 18. If you believe your child under the age of 18 has uploaded information in connection with our Services, please contact us using the information in the **Contact Us** section below.

8. Contact Us

To ask questions or comment on this Privacy Policy and our related practices, contact us at privacy@gate.hk.