

RIZONPAY LIMITED

Privacy Policy

Date: 01.08.2023

RizonPay Limited takes data privacy very seriously and recognizes the importance of protecting and respecting your personal data. This Privacy Policy describes the information we collect, how we use that information, to whom we pass the information, your rights and key contact information

1. Overview

To provide you with our remittance and exchange services we need to collect information about you. Any information we receive about you will be subject to strict controls to minimize the risk of misuse – including unauthorized access to, or disclosure of, your personal data.

Please read this notice carefully, together with our Terms and Conditions and any other documents referred to in it. Here we set out the basis on which any information we collect about you or from you, or that you provide to us, will be processed by us and other parties in providing you with the services accessed through the website, apps or over the phone (website link – www.rizonpay.hk). RizonPay Limited commits to using your information only in accordance with the terms of this Privacy Policy.

For the purposes of this Privacy Policy, the term “**information**” means any confidential and/or personal data or other information related to users of RizonPay Limited Services – including, but not limited to, corporate and individual customers and their connected parties.

By visiting this website, our partners’ websites, or providing your personal information to one of our employees, for example by telephone or email, **you accept and expressly consent to our use and disclosure of your personal information and direct us to do so in the manner described in this Privacy Policy.**

This includes consenting to the processing of any sensitive personal information you provide, as described below in section 2. It also includes information you provide when you browse our website, request a quote, register for an account, enter into a contract for the supply of money transfer services, enter a competition, promotion or survey and when you contact us for other reasons.

If you have concerns about any of the terms of this Privacy Policy, please contact us at info@rizonpay.com so that we can provide further information.

A special note about children

Children are not eligible to use RizonPay Limited (hereinafter referred to as the “Company”) Services. We respectfully ask that minors (persons under the age of 18) do not submit any information to us or use Company’s Services.

2. What information we collect

Information you provide to us

You may provide us with information by filling in forms on our website, our partners’ websites or by talking with us by over the phone or correspond with us via email or otherwise.

This includes information you provide when you browse our website, request a quote, register for an account, enter into a contract for the supply of money transfer services, enter a competition, promotion or survey and when you contact us for other reasons.

Initial information

To open Company’s account or use Company’s Services, you must provide your name, address, phone number and email address – and we may ask you to provide identity document number(s) and copies of identification documents, for example your driving license or passport, or a utility bill.

In order to make payments using Company’s Services, you may be asked to provide debit card details (including the long number, start and expiry dates and the card verification value code (CVV/CVC)) your destination bank details (account number, sort code, IBAN, SWIFT, ABA or routing number).

We may also ask you to choose two different security questions to answer (such as your city of birth or your pet’s name). If we ask you to set up these security answers, we will be unable to provide our services unless you provide this information.

Additional verification information

We may ask you to send us additional information if:

- we cannot verify the information you provide; or
- a query is raised by background checks (see below); or
- if you send or receive certain high-value transactions or high overall payment volumes through Company’s Services; or
- as is otherwise required in order for us to comply with our obligations under money laundering regulations.

The additional information may include a copy of your driving licence, passport, and/or a recent utility bill, or other information verifying your identity and address, or to answer additional questions to help verify your information.

We may also ask for evidence of source of funds or wealth, for example bank statement, investment statement, business transaction summary, proof of property sale or probate documents.

When we communicate

When you communicate with us for customer service or other purposes, including by phone, email or using other methods, we retain that information and our responses to you.

We record calls on our telephone lines for quality control purposes, as evidence of transactions and to fulfil regulatory requirements. Any information you disclose to us will be held on these recordings. We also record any phone number used to call us where a call is connected and the number not withheld.

We ask that you do not disclose **sensitive personal information**, including the state of your health, in any communication, however if you should do so voluntarily, you consent for us to hold that information in our communication records and phone recordings (see further details below).

Information we collect when you use our website or app

When you arrive at or leave the Company's website – www.rizonpay.hk, whether connected by a fixed line or wirelessly, we receive the web address of the site that you came from or are going to.

While you are using our website we collect information on the services you search for or view, page response times and length of visits to specific pages, how you interacted with each page (including scrolling, clicks and mouse-overs), and methods used to browse away from the page.

We collect information about the device you are using, such as the type of device, operating system and platform, the type and version of browser, browser plug-in types and versions, the times you access our website/app and the time zone setting, mobile network information and unique device identifier, which may include your Device's IMEI number and/or MAC address, or the mobile phone number used by the Device. We do not capture GPS information about you.

If you give us permission, our app may collect information stored on your Device, including contact information from your address book, photos, videos or other digital content. The app may periodically re-collect this information in order to stay up-to-date.

Photographs and facial imaging

If you use certain functionalities provided by us (including our mobile website or app) we may ask you to upload a photograph of your identity document and/or use the Device's camera to verify your identity using facial recognition in order to provide these specific services. Your face must be recognizable.

Transaction information

When you use Company's Services to purchase currency or send currency to someone else, we ask you to provide information related to that transaction. This information includes the amount, currency and type of the transaction, source of funds, exchange rate, recipient name and bank details, recipient address for some jurisdictions and, optionally, the recipient's email address and phone number.

Individuals who are not registered users of RizonPay Limited Services

Connected parties

If it is necessary for you to provide personal information about other individuals in the course of dealing with us, for example regarding directors and shareholders of a company, or the other party to a joint account, you should do so only where you are authorized by those individuals.

Recipients

When you engage an individual who is not the Company's customer in a transaction, e.g. by sending a payment to that individual, we will retain the information that you submit to us, including, for example, the other party's name and/or bank details.

Privacy policy notification to 3rd parties

Although the information on Connected Parties and/or Recipients is stored for a certain period of time in compliance with applicable law, we will not use it to market to the non-registered person.

Additionally, these persons have the same rights to access and correct information about themselves as registered users of the Company's Services. You should bring this Privacy Policy to their attention at the earliest opportunity so they are aware of how their information will be processed by us and aware of their rights in relation to that information.

Information about you that we receive from third parties

Fraud prevention checks

To protect ourselves and our customers against fraud, we verify the information you provide with Anti-Fraud Agencies and Electronic Identity Verification Services. In the course of verification, we receive information about you from such services.

If you register a debit card or bank account with the Company, we will use card authorisation and anti-fraud screening services to verify that your bank or card information and address match the information you supplied to the Company, and that the card has not been reported as lost or stolen.

Identity verification using Electronic Verification Providers

Any electronic identity check with a credit agency may leave a record on your credit file. By agreeing to the terms of this Privacy Policy, you agree that we may carry out such searches in the knowledge that it may leave a record on your credit history. If you are a joint account holder, in certain circumstances credit agencies may link your record with your spouse, partner or other financial associates.

Background checks

We conduct a background check on all our customers (and for business customers, also on the business's directors, shareholders and partners). During this process we will obtain information about you and/or your business, its directors, shareholders and partners, from an identity verification provider.

Information about you from other sources

We may also collect information about you from other sources, including other companies (subject to their privacy policies and applicable law), and from other accounts we have reason to believe you control.

We may receive information about you if you use any of the other websites we, or our group companies, operate or the other services we provide. We are also working closely with third parties (including, for example, business partners and affiliates, customers who participate in our refer-a-friend programme, service providers, advertising networks, analytics providers, and search information providers) and may receive information about you from them. This may be combined with the information you provide to us.

We will use information we receive from business partners for marketing purposes only if you have provided your consent to do so, either to the third party which collected the information, or to us.

Sensitive data

Data privacy regulations prohibit the processing of ‘**special categories of personal data**’, also called ‘**sensitive data**’ unless you have given your consent.

Sensitive data includes information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, and data concerning health, sex life or sexual orientation. There are also restrictions on processing of criminal convictions and offences.

To avoid infringing these restrictions, it is Company’s policy that we do not ask for or collect any of the above data from you or any other party, so we therefore ask that you please do not reveal any sensitive data about yourself or others in any communication with us.

If you do reveal sensitive data, for example by phone or in an email, you will be giving express consent for us to process that information by storing the recording of the telephone call, or the email or other communication.

3. How we use your information

Our primary purpose in collecting your information is to provide you with a safe, smooth, efficient and customised experience. By submitting your information to the Company and using Company’s Services you agree that we may use your information for the following purposes:

Fulfilling your requests

We will use your information to:

- provide you with the information, products and services that you request from us, including providing you with money transfer services and quotes;
- complete any transaction you are undertaking with us; and
- administer any promotion, survey or competition that you enter via our website(s).

Compliance and risk management

As an authorised Money Service Operator, we are obliged to carry out background checks on individuals, companies and connected parties, and to monitor ongoing transactions. This is to prevent fraud and money laundering, including to help protect your accounts from fraudulent activity and to allow us to alert you and/or relevant law enforcement agencies if we detect such fraudulent activity on your account.

We carry out checks to ensure we do not deal with countries, entities or individuals that are subject to sanctions, to comply with counter-terrorist financing and anti-money laundering regulations and to identify high-risk individuals where we need to add additional controls. We also conduct investigations into actual or suspected violations of our Terms of Use.

Communication and customer service

We communicate with our users on a regular basis via email, phone and SMS to provide requested services and help you manage your account. These activities include:

- responding to requests for customer service;
- confirming information concerning a user's identity, business or account activity;
- informing users if we believe their accounts or any of their transactions have been used for an illegitimate purpose;
- resolving customer complaints;
- carrying out collection activities;
- resolving disputes about billing or transactions;
- conducting customer surveys; and
- investigating suspicious transactions.

We use your email and physical address to:

- confirm your opening of the Company's account;
- send you notice of money transfers that you send or receive through the Company's account;
- send you information about important changes to our products and services, including notice of any times that our services may not be available; and
- send notices and other disclosures required by law.

Users cannot opt out of these communications, but they will be primarily service-oriented rather than promotional.

As we are obligated to send these communications to current customers, if you do not wish to receive these communications at all, then unfortunately you must close your account, however if you do not wish to receive them in a particular way, please contact us to advise us of your preferred communication method.

Marketing

We also use your email address to send you other types of communications that you can control, including market updates, customer surveys and special promotions. These communications are to:

- provide you with information about services we or other RizonPay Limited Companies offer that are similar to those that you have already enquired about or purchased;
- provide news about currency market movements, marketing and advertising messages, updates on the services we offer, and promotional offers based on your activities when using the Company's Services;
- measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you, which may be based on your activity on our website(s) or third parties' websites;

- make suggestions and recommendations to you and other users of our website(s) about services that may interest you or them, which may be based on your activity on our website(s);
- keep you informed about currency market events and news; and
- tell you about new products and features we are developing that you may find useful.

You can choose whether to receive some, all or none of these communications and the methods by which you receive them when you request a quote, enquire or complete the registration process (or at any time thereafter) by logging in to your account on the Company's website – www.rizonpay.hk, visiting your profile page and accessing the preference centre – or by calling us and amending your preferences over the phone. We may also send you SMS messages for the same purposes.

Service improvements and account management

We will use your information to deliver and improve Company's Services and manage your account, including:

- verifying your identity, including during account creation and password reset processes;
- performing credit and solvency checks, validating the accuracy of information, and verifying it with third parties;
- resolving disputes, collecting fees and troubleshooting problems;
- allowing us to manage risk and to detect, prevent, and/or remediate fraud or other illegal or prohibited activities;
- detecting, preventing or remediating violations of our policies, Terms and Conditions or other user agreements;
- providing you with customer support services including notifying you of changes to our service, including any outages, and to send you service emails relating to your account and transactions on your account;
- improving our existing, and developing new, products, services, websites, apps and capabilities;
- administering our website(s) and for internal business administration and operations purposes, including storage, backup, archiving, troubleshooting, data analysis, testing, research, statistical and survey purposes; and
- as part of our efforts to keep our site safe and secure, including managing and protecting our information technology infrastructure.

Device information

We will use this information to:

- administer our website(s) and the app for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- improve our website(s) and the app to ensure that content is presented in the most effective manner for you and for your computer;

- to allow you to participate in interactive features of our service, when you choose to do so;
- as part of our efforts to keep our website(s) and the app safe and secure;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- to make suggestions and recommendations to you and other users of our website(s) and the app about goods or services that may interest you or them;
- to verify your identity, protect against fraud, comply with anti-financial crime laws and to confirm your eligibility to use our products and services; and
- to comply with our regulatory obligations.

Location information / IP (Internet Protocol) address:

We will use information about your location, derived from your IP address:

- to deliver relevant advertising to you, for example, information on tailored money transfer services for your region; and
- to protect against fraud.

Third party information

We will combine third party information with information you give to us and that we collect about you. We will use all of this information:

- to help us better understand your financial circumstances and behaviour so that we may make decisions about how we manage your Company's Account;
- to process applications for products and services available through us, including making decisions about whether to agree to approve any applications;
- for the purposes set out in the sections above (depending on the types of information we receive).

Questionnaires, surveys, competitions and profile data

From time to time we may offer you optional questionnaires, surveys and competitions. If you choose to answer these questionnaires, surveys or competitions, we may use your information to improve Company's Services, send you marketing or advertising information, manage the competitions and for such purposes as collecting demographic information or assessing users' interests and needs. You will be given notice of how the information will be used prior to your participation in the survey, questionnaire or competition.

Accessing and changing your information

You can review the information you have provided to us and make any desired changes to your information or to the settings on your Company's account at any time by logging in to your account on the Company's website, visiting the profile page and changing your details.

4. Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site and to provide interest-based advertising. You may adjust the settings on your browser to refuse cookies but some of the services on our website(s) may not work if you do so. For detailed information on the cookies we use and the purposes for which we use them see our Cookie Policy.

5. Sharing information with third parties

To support our business and provide services to you

Just like most banks and financial/payment service providers, the Company works with third-party service providers (including banking partners and banking intermediaries, money transfer operators and etc.) who provide important functions that allow us to make our money remittance services easier, faster, and safer.

This includes business partners under contract with us who support our business operations, such as but not limited to fraud prevention, bill collection, marketing, customer service, contract administration and technology services. We need to disclose user data to them from time to time so that the services can be performed. Our contracts dictate that these business partners only use your information in connection with the services they perform for us and not for their own benefit.

By accepting this Privacy Policy and maintaining an account with the Company, you expressly consent to the transfer of your data to those third parties for the purposes listed.

Banks and payment providers

When you ask us to process a currency or payment transaction, we will provide your information to the business partners who are contracted to the Company to complete this transaction, for example passing bank details to correspondent bank(s) or payment provider(s) involved in the transaction.

Anti-fraud, anti-money laundering, sanctions and risk management

To carry out the checks described in section 3, we will provide your information to our third party business partners who carry out these checks, including photographs of yourself or your identity documents that you have provided to us.

Reporting to regulators

As a regulated financial institution, in some jurisdictions we are obliged to report transactions to the relevant financial regulator. We will provide your information to the regulators to meet these legal obligations.

Credit card associations and legal process

We may also disclose necessary information in response to the requirements of credit card associations or a civil or criminal legal process.

We may disclose or share your information in order to enforce or apply the Terms and Conditions – and other agreements – between you and us, or to investigate potential breaches to protect the rights, property, or safety of the Company, our customers, or

others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction and, if required, to obtain professional advice.

Where required by law

We may disclose necessary information to the police and other law enforcement agencies, security forces, competent governmental, intergovernmental or supranational bodies, competent agencies, departments, regulatory authorities, self-regulatory authorities or organisations, and other third parties, including RizonPay Limited Group companies, where we are legally compelled and/or permitted to do so.

Mergers and acquisitions

As with any business, it is possible that in the future the Company could buy, merge with, or be acquired by, another company. We may disclose your information to the prospective seller or buyer of such business or assets, along with its professional advisers. If the Company or a substantial proportion of its assets are acquired by a third party, information held by us about our customers will be one of the transferred assets, and such successor company would continue to be bound by this Privacy Policy unless and until it is amended.

Analytics and search engine providers

We share your IP address with analytics and search engine providers that assist us in the improvement and optimisation of our site, and also for 3rd party advertising on 3rd party websites. See also our **Cookie Policy**.

Affiliates

If you are referred to us by a third party – either via our affiliate network or via the refer-a-friend promotion – depending on the arrangement, we may notify them when you book a transaction.

We have a select group of affiliates to whom we occasionally refer customers. If we think you may benefit from these services, we will ask you if you would like us to pass on your details. We will always name the affiliate and ask you for permission before we refer you, and we will pass on your details only where you give us permission to do so. If we refer you, we will typically pass on your name, email address and telephone number.

Third party websites

Our site may, from time to time, contain links to the websites of our business partners, advertisers and affiliates.

If you request a quote directly on a third-party website or via a third party application, any information that you enter on that website or application (and not directly through Company's website) may be shared with the owner of any such third party website.

Please note that these websites have their own privacy policies and we do not accept any responsibility or liability for those policies. Please check those policies before you submit any information to third party websites.

6. Transferring data overseas

The Company is committed to adequately protect your information regardless of where the data resides and to providing appropriate protection for your information where such

data is transferred outside of Hong Kong Special Administrative Region (Hong Kong SAR).

The information that we collect from you may be transferred to, and stored in, a country outside Hong Kong SAR. It may also be processed by staff operating outside Hong Kong SAR who work for us or for our suppliers. These staff may be engaged in the fulfilment of your request, the processing of your payment details and the provision of support services. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

The laws in some countries may not provide as much legal protection for your information as in Hong Kong SAR. In these circumstances, our policy to protect your data is to rely on findings of adequacy by the Office of the Privacy Commissioner for Personal Data Hong Kong or the Personal Data (Privacy) Ordinance (the “PDPO”), including the Data Protection Principles contained in Schedule 1 of the PDPO (‘DPPs’ or ‘DPP’) (for countries in scope of those findings), **the European Commission (for the countries of the European Economic Area (EEA))** or standard contractual clauses adopted by the European Commission or the UK Information Commissioner (for all other countries).

Each time you attempt to make a money transfer using your Company’s account, the Company may transfer your relevant information to the recipient and any intermediate banks or payment service providers, who may be located outside Hong Kong SAR, and any other service providers as described above, in order to process, execute or otherwise deal with and provide information about the payment.

By submitting your information and making use of the Company’s Services, you agree to such transfers, storing or processing. We will take all steps reasonably necessary to ensure that your information is treated securely and in accordance with this Privacy Policy.

We will do our best to protect your information, however we cannot guarantee the security of your information transmitted to our site or sent to us by email or other non-secure electronic methods; any such transmission is at your own risk. Once we have received your information, we will use protective procedures and security features to try to prevent unauthorised access.

7. Data Retention Policy

We are obliged by financial markets laws to retain account data for 5 years after the closure of an account. In some circumstances, such as an enquiry from a law enforcement agency, we may have to hold it longer. We may also retain information if required to protect our interests, for example in case of litigation. When data falls outside those retention periods we will take steps to delete it from our system. Where you have asked us not to contact you, we will retain that information on a ‘do not contact’ list to reduce the risk of us contacting you in the future.

8. Systems Security Policy

The Company has security measures in place designed to prevent data loss, to preserve data integrity, and to control access to the data. Only authorised employees of the Company and our business partners processing data on our behalf have access to your

personal data. All Company's employees who have access to your personal data are required to comply with our privacy policy. All business partners are requested by the Company to ensure that any of their employees who have access to your personal data have signed non-disclosure agreements. Contracts with business partners acting as data processors for the Company involving personal data require an adequate level of security and require that personal data is processed only as instructed by the Company.

System security and monitoring

To ensure data privacy, confidentiality and integrity, all information disclosed, shared, stored or used and any transactions performed by you through our website and app are encrypted.

To provide a secure environment for our website and app, we hold your data in secure data centres with high levels of physical and technical security, including using firewall systems, data encryption and anti-virus protection. We use security surveillance systems to detect and prevent illegitimate access to and activities on our systems. External security experts conduct regular security reviews on our systems and we work with them to keep abreast of information security technology developments and implement relevant enhancement.

Password security

To control access to our services, every customer is required to input a Username and Password. To help us protect your information, you are advised to do the following:

- Do not choose a password that could be easily guessed by another person.
- Avoid using personal information such as your name, birth date or telephone number, or ordinary words found in a dictionary.
- Memorise your password – do not write it down.
- Never reveal the password to anyone else. We will never ask you for your password and you should not disclose it to anyone claiming to work for us or our business partners.
- Do not use the same password on other services.

Customer responsibilities

We keep our security technology up-to-date to protect your information, but we do not have control over the devices you use to access the Company's Services.

It is your responsibility to safeguard your online information and transactions by taking all reasonable measures which may include the following:

- Do not share your information or provide any opportunities for anyone to gain access to your information through your devices, including tablets, phones, watches or laptops.
- Do not click on any internet link contained in an email or SMS which directs you to the Company's website – www.rizonpay.hk. Always manually type our address www.rizonpay.hk into your internet browser or use the app.
- Log out and close your browser before visiting other websites once you have completed your transactions.

- Ensure that you use the latest version of your internet browser and that you have up-to-date anti-virus, firewall and other security software installed on your device.

9. Customer rights

You have the following rights:

To ask us to correct any information we hold about you if it is incorrect.

Whilst we endeavour at all times to keep your information accurate, we welcome your corrections. You can correct your profile at any time by logging onto your account via the Company's website – www.rizonpay.hk, or you can call your account manager to make any changes. We may ask you for additional verification information if you are changing certain details such as your name or your address.

To ask us to erase your information if we no longer have any reason to hold it, also known as the 'right to be forgotten'.

Our Data Retention Policy (see section 7) explains the circumstances when we can or are obliged to retain information, however outside of those periods we will delete your information in line with our data retention policy and on request. We will maintain a record that you made an erasure request to reduce the likelihood of us contacting you in the future but we will use that information for no other purpose.

To ask us to return to you information you provided to us, also known as 'data portability'.

You can ask us to send you in electronic format the information you provided to us under our Terms and Conditions or under consent.

To ask us not to process your information where you previously gave consent or where we are exercising our legitimate interest.

If you make a request for us to stop processing your information, we will investigate to see if there is a compelling reason for processing to continue and will discuss the conclusion of the investigation with you.

You cannot object to processing which is a legal obligation or where we must process your information to satisfy a contract to which you are a party. If you previously gave consent and we processed your data on the basis of that consent, you cannot object to that past processing, however you can ask us to stop processing it in the future.

To ask not to be subjected to automated decision making and profiling.

RizonPay Limited puts the human factor at the heart of our customer service, so there are no circumstances when profiling or other automated decision making will have a legal impact on you without a person reviewing and making a decision on the result. If you feel you may have been unfairly impacted by profiling, our team can manually assess whether the decision is fair and discuss the situation with you.

To ask for a copy of the information we hold about you.

We will endeavour to respond to your request within 30 days, however at time of high demand we may need 90 days to compile a full response.

To ask us not to process your information for marketing purposes.

You can do this by checking or unchecking certain boxes on the forms we use to collect your information, or by logging onto your account and managing your contact preferences, or by clicking on the ‘unsubscribe’ link(s) at the foot of every marketing or promotional email.

You may exercise any of the above rights by contacting us at info@rizonpay.hk or by calling your Account Manager.

10. Contacting us

The Data Controller

The Data Controller is RizonPay Limited, Registered office address: Level 12, Infinitus Plaza, 199 Des Voeux Road Central, Sheung Wan, Hong Kong.

RizonPay Limited, a Hong Kong Private Company Limited by Shares with registered address at: Level 12, Infinitus Plaza, 199 Des Voeux Road Central, Sheung Wan, Hong Kong, and with Hong Kong Certificate of Incorporation No. **3262228** issued and dated on 20th of March 2023.

Regulated by the Hong Kong Commissioner of Customs & Excise (CCE) under the Anti-Money Laundering and Counter-Terrorist Financing (Financial Institutions) Ordinance, Cap. 615 AMLO) of 2012, we are providing our customers with fast, secure and inexpensive payment services that allow them to send and receive money around the world.

The company’s “Money Service Operator” License **No.15-01-01589** issued by Customs and Excise Department of Hong Kong is valid until February 9th, 2023.

Contacting us with questions or requests

If you want to exercise your right to access your information or have any questions about this Privacy Policy, Company’s information practices, or your dealings with the Company you can contact us by email at info@rizonpay.hk.

Complaints

If you believe that we have breached a privacy law with which we should comply, please send an email at info@rizonpay.hk. We aim to respond in a reasonable time, normally within 30 days. Our Compliance team will look after your complaint and will give you additional information about how it will be managed.

11. Changes to this Privacy Policy

We may amend this Privacy Policy at any time, as new features are added to the Company’s Services or as we incorporate suggestions from our customers. Any changes we may make will be posted on the Company’s website – www.rizonpay.hk, so please check back frequently.

Your continued use of our website(s) after a posting of a new version of this Policy will constitute your acceptance of, and agreement to, any changes. If you disagree with the terms of this Privacy Policy, you may close your account at any time.