

PRIVACY POLICY

This Privacy Policy was last updated on June 22, 2017

Geoswift Limited and its subsidiaries and affiliates (“Geoswift”, “we”, “us”, “our”, and similar terms) respects your privacy and values the confidence of its customers, partners, and employees. This Privacy Policy explains, among other things, the types of information collected about you when you visit Geoswift sites <http://www.geoswift.com/> and <https://www.paytuitionnow.com/> (the “Websites”), how your information may be used and when it may be disclosed, how you can control the use and disclosure of your information, and how your information is protected.

Geoswift complies with the data protection principles and all relevant provisions of the Hong Kong Personal Data (Privacy) Ordinance. In doing so, we will ensure that all Geoswift employees and third party service providers/partners involved in handling personal data comply with appropriate standards of security and confidentiality.

This Privacy Policy applies to Geoswift Websites, as well as any online services that link to this Privacy Policy (the “Services”). Please read the entire Privacy Policy before using our Services. By using the Services, you agree to abide by the terms of this Privacy Policy.

If you have questions or concerns about our Privacy Policy or practices, please contact us at privacy.policy@geoswift.com. If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact TRUSTe at <https://feedback-form.truste.com/watchdog/request>.

1. Personal Information Collection

Nature and Purpose of the Collection

In order to carry out some of our Services, we may collect the following personal information from you on one or more of our Websites covered under this Privacy Policy:

- Payment information for transfer of funds on <https://www.paytuitionnow.com/>, including payment reference number, name, student id, national id number, email address, phone number, and date of birth.
- Your email address, physical address, company name and telephone number.

In addition, we may also collect the following third party personal information from you, should the identity of the payer be different from the student, as part of our transfer services offered on <https://www.paytuitionnow.com/>

- Third party's Chinese name
- Third party's China National ID number
- Third party's China phone number

We may use information that we collect through the Services for a variety of purposes, including to:

1. Processing various service applications, including financial services requested on <https://www.paytuitionnow.com/>;
2. Provide you with the products, promotions, services, newsletters, and information you request and respond to correspondence that we receive from you;
3. Maintain or administer the Services, perform business analyses, or for other internal purposes to improve the quality of our business, the Services, and other products and services we offer;
4. Contact you via email and otherwise about products, services, and events that we believe might be of interest to you;
5. Customize and personalize your use of the Services; and
6. As otherwise described to you at the point of collection or pursuant to your consent.

Sharing of Information

We are committed to maintaining your trust, and we want you to understand when and with whom we may share the information we collect. Again, we will not sell your personal information to any third parties.

We may share some or all of your personal data with the following parties and for the following purposes:

- Corporate Parents, Affiliates, and Subsidiaries. We may share your information with our subsidiaries and other affiliated entities for a variety of purposes, including for business and operational purposes.
- Service Providers. We may share your information with service providers that perform certain functions or services on our behalf (such as to host the services or manage databases). These third parties are authorized to use your personal information only as necessary to provide these services to us.
- Various government agencies and/or officials as required by law or as necessary to protect our business and services. We may disclose your information to third parties in order to protect the legal rights, safety, and

- security of Geoswift and/or any of our affiliates and subsidiaries, and the users of our Services, including sharing data and information within Geoswift or its related associates and/or any other use of data and information in accordance with any group-wide programs for compliance with sanctions or prevention or detection of money laundering, terrorist financing or other unlawful activities; investigate fraud, enforce our Terms of Use; prevent fraud (or for risk management purposes); and comply with or respond to law enforcement, legal process or a request for cooperation by a government or other entity, whether or not legally required.
- In Connection with a Transfer of Assets. If we sell all or part of our business, or make a sale or transfer of assets, or are otherwise involved in a merger or business transfer, or in the event of bankruptcy, we may transfer your information to one or more third parties as part of that transaction. You will be notified via email and/or prominent notice on our Website of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information.
 - Other Parties with Your Consent. We may share information about you with third parties when you consent to such sharing or as required by law, including when you post information to a user profile or a public area of the Services, such as a chat room, forum, blog, or other community tool.

Any disclosures in connection with requirements of the law or as necessary to protect the services, the obligations and/or requirements shall stem from the following basis:

- Any law binding or applying to it within or outside the Hong Kong Special Administrative Region existing currently and in the future;
- Any guidelines or guidance given or issued by any legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations of financial services providers within or outside the Hong Kong Special Administrative Region existing currently and in the future;
- Any present or future contractual or other commitment with local or foreign legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations of financial services providers that is assumed by or imposed on Geoswift of its financial, commercial, business or other interests or activities in or related to the jurisdiction of the relevant local or foreign legal, regulatory, governmental, tax, law enforcement or other authority, or self-regulatory or industry bodies or associations;

2. Use of Cookies, Log Files and Other Tracking Technologies

Cookies

Cookies are small data files which are placed on data subject's device when data subject visit certain parts of Geoswift's Website or click on Geoswift's online advertisements.

Cookies and similar technologies are used to identify data subject's device for the following purposes:

1. Essential cookies. These essential cookies are set throughout Geoswift's Website and are required for the operation of the Website to:
 - allow Geoswift's web server to determine whether the cookies setting on data subject's web browser has been enabled or disabled. This allows Geoswift to know whether data can be collected from data subject's web browser;
 - temporarily allow data subject to retain certain information/preferences between pages of Geoswift's Website to avoid having to re-enter that information;
 - temporarily identify data subject's device after data subject has logged in to a secure page on Geoswift's Website so that Geoswift's web server can maintain a dialogue with data subject's web browser in order for data subject to carry out certain activities.
2. Analytical/performance cookies. These are used to help Geoswift improve Geoswift's Website by tracking data subject's visits to Geoswift's Website and recognizing data subject's web browser when data subject is repeat visitor so that Geoswift can gather statistics on new and repeat visitors to evaluate site effectiveness.
3. Functionality cookies. These are used to recognize data subject when data subject return to Geoswift's Website. This enables Geoswift to:
 - personalize content for data subject and remember his/her preferences (for example, choice of language and region);
 - store his/her login and other preferences so he/she does not have to re-enter that information when he/she returns to Geoswift's Website.
4. Targeting / Advertising cookies. These cookies record data subject's visits to Geoswift's Website, his/her response to Geoswift's online advertisements, track the pages he/she have visited and the website links he/she have followed. Geoswift use this information to:
 - make Geoswift's Website more relevant to data subject's interests;

- provide online advertisements or offers on Geoswift's Website or third-party websites which are most likely to interest he/she;
- evaluate the effectiveness of Geoswift's online marketing and advertising programs.

The above cookies may be placed on data subject's device by Geoswift or by third parties on Geoswift's behalf (for example, advertising networks and providers of external services like web traffic analysis services). Our third party partner may use technologies such as cookies to gather information about your activities on this site and other sites in order to provide you tailored advertisements based on your browsing activities and interests. If you wish to not have this information used for the purpose of serving your interest-based ads, you may contact us at privacy.policy@geoswift.com. No personally identifiable information about data subject is collected or shared with third parties as a result of this.

Most web browsers are initially set up to accept cookies. If you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows you to decline the use of cookies. Please be aware that if you reject cookies or other similar technologies, you may still use our Website, but your ability to use some features or areas of our site may be limited. To learn more about cookies, please visit <http://www.allaboutcookies.org/>.

Log Files and Other Tracking Technologies

As true of most websites, we gather certain information automatically and store it in log files. This information may include internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data. We do not link this automatically collected data to other information we collect about you.

In addition to cookies, technologies such as beacons and scripts are used by Geoswift and our third-party service providers who may use these technologies to collect information that helps us with traffic measurement, research, and analytics. We will use these types of technologies to analyze trends, administer the sites, track users' movements throughout the sites, and to gather demographic information about our user base as a whole. We may receive reports based on the use of these technologies by these companies on an individual as well as aggregated basis.

3. Personal Information Security

Geoswift takes all reasonably practicable means to protect the data, such as, by restricting the access of data by authorized personnel only and incorporating

security measures into equipment in which data is held. Encryption technology is employed for sensitive data transmission.

We maintain reasonable security procedures to help protect against loss, misuse, unauthorized access, disclosure, alteration or destruction of the information you provide to us. Security procedures include, restricting the access of data by authorized personnel only and incorporating security measures into equipment in which data is held. Encryption technology is employed for sensitive data transmission.

However, please note that no data transmission or storage can be guaranteed to be 100% secure. As a result, while we strive to protect your information and privacy, we cannot guarantee or warrant the security of any information you disclose or transmit to us online and cannot be responsible for the theft, destruction, or inadvertent disclosure of your information. If you have any questions about the security of your personal information, you can contact us at tuition_ops@geoswift.com.

We may retain your information for as long as your account is active or as needed to provide you services, comply with our legal obligations, resolve disputes and enforce our agreements.

4. Social Media Features (Widgets)

Our Services includes Social Media Features, such as the Twitter and LinkedIn follow icons. These Features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the Feature to function properly. Social Media Features and Widgets are either hosted by a third party or hosted directly on our site. Your interactions with these Features are governed by the privacy policy of the company providing the Feature.

5. Co-Branding

Geoswift and its branding partner work in coordination with each other to provide tuition payment services to customers in China. Personally identifiable information may be passed between partners for the purpose of effecting payment to the beneficiary. In the event unusual or activity is detected, an investigation may also lead to the sharing of personal information between branding partners. In the event customers would like to limit the sharing of information, Geoswift can be contacted as indicated in Sections 8 and Section 9 below.

6. Minors

We do not knowingly collect, use, or disclose personal information from children under the age of 13. We request that these individuals do not submit such information to us. If you believe that we have inadvertently collected the information of a child, please contact us at privacy.policy@geoswift.com.

7. Privacy Policy Updates

We may update this Privacy Policy to reflect changes to our information practices. If we make any material changes, we will notify you by means of a notice on our site prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

8. Links to Third Party Sites

The Services may contain links to other websites or online services that may be operated and maintained by Geoswift or third parties and that are not under the control of or maintained by Geoswift. This Privacy Policy does not apply to this third-party content. We encourage you to review the privacy policies of these third-party websites or services.

9. Your Choices and Your Information

Geoswift provides you with the ability to review and correct certain information that you have provided to us. If you wish to update or delete inaccuracies within your contact information that you provided to us, you may contact us at privacy.policy@geoswift.com. We will respond to your access request within 30 days.

You may also “opt-out” of receiving promotional or marketing communications by using the unsubscribe feature included in the emails that we send, or contact us at privacy.policy@geoswift.com. Should you later request to receive promotional or marketing communications, that request will override this opt-out.

10. Contact Us

If you have any questions about this Privacy Policy, you may contact us at +852 2312 2168, by e-mail at privacy.policy@geoswift.com, or by mail to Suite 2116 - 2118, The Metropolis Tower, 10 Metropolis Drive, Hung Hom, Kowloon, Hong Kong. Please ensure you include this in your inquiry: Attention: Compliance Department.

GEOSWIFT 隐私政策

本隐私政策的最后更新日期为 2017 年 6 月 22 日。

Geoswift Limited 及其子公司和附属公司（以下简称“Geoswift”、“我们”、“我们的”及类似词语）尊重您的隐私，并重视其客户、合作伙伴和员工的隐私。除其他事项外，本隐私政策还解释了在您访问 Geoswift 网站 <http://www.geoswift.com/> 和 <https://www.paytuitionnow.com/>（以下简称“网站”）时将收集的与您相关的信息类型、会如何使用您的信息以及何时可披露您的信息、您如何控制对您信息的使用和披露以及我们如何保护您的信息。

Geoswift 遵守《香港个人资料（隐私）条例》(Hong Kong Personal Data (Privacy) Ordinance) 中的个人资料保护原则和所有相关规定。这样，我们将确保参与处理个人资料的所有 Geoswift 员工和第三方服务供应商/合作伙伴遵守安全性和保密性的适用标准。

本隐私政策适用于 Geoswift 网站以及链接至本隐私政策的任何在线服务（以下简称“服务”）。请在使用我们的服务前通读本隐私政策。使用服务即表示您同意遵守本隐私政策的条款。

如果您对我们的隐私政策或惯例有任何疑问或顾虑，请发送电子邮件至 privacy.policy@geoswift.com 联系我们。如果我们未能圆满解决您未解决的隐私或数据使用问题，请使用以下网址与 TRUSTe 联系：<https://feedback-form.truste.com/watchdog/request>。

1. 个人信息收集

收集的性质和目的

为进行我们的某些服务，我们会在本隐私政策所涵盖的一个或多个我们的网站上收集来自您的以下个人信息：

- 在 <https://www.paytuitionnow.com/> 上进行资金转账的付款信息，包括付款参考号、姓名、学号、身份证号、电子邮件地址、电话号码、出生日期
- 您的电子邮件地址、实际地址、公司名称和电话号码

另外，如果付款人的身份与学生的身份不相同，作为我们在 <https://www.paytuitionnow.com/> 上提供的转账服务的一部分，我们还会向您收集以下关于第三方的个人信息：

- 第三方的中文名
- 第三方的中国公民身份证号
- 第三方的中国电话号码

我们还可能将通过服务收集的信息用于各种用途，包括：

1. 处理各种服务申请，包括在 <https://www.paytuitionnow.com/> 上申请的金融服务；
2. 根据您的要求向您提供产品、促销活动、服务、通讯和信息，并回复您向我们发送的往来信件；
3. 维护或管理服务，进行业务分析，或者出于其他内部目的提高我们业务、服务及我们提供的其他产品和服务的质量；
4. 在有我们认为您可能感兴趣的产品、服务和活动时通过电子邮件或其他方式联系您；
5. 自定义并个性化您对服务的使用；以及
6. 在收集时对您另有说明或依据您同意的其他方面。

信息共享

我们致力于维护您对我们的信任，并希望您能了解我们何时会与谁共享我们所收集的信息。再次重申，我们不会将您的个人信息出售给任何第三方。

我们可将您的部分或全部个人资料与以下各方共享，用于以下用途：

- 公司的母公司、附属公司和子公司。我们可与我们的子公司及其他附属公司共享您的信息，并用于各种用途，包括业务和运营用途。
- 服务供应商。我们可与代表我们行使某些职能或服务（例如托管服务或管理数据库）的服务供应商共享您的信息。这些第三方被授权仅在向我们提供此类服务所必需时使用您的个人信息。
- 在根据法律要求或有必要保护我们的业务和服务时，与各政府机构和/或官员分享。为保护 Geoswift 和/或我们的任何附属公司和子公司以及我们服务用户的合法权益、安全和安保，我们可能会向第三方披露您的信息，包括根据在整个集团范围内实施的用于制裁或预防或发现洗钱、恐怖主义融资或其他非法活动的任何计划，在 Geoswift 内部或与之相关的同仁共享数据和信息和/或数据和信息的任何其他使用情况；为调查欺诈行为、强制执行我们的使用条款；为防止欺诈（或出于风险管理目的）以及遵守或响应政府或其他机构提出的执法、法律程序或配合执法的要求（无论法律是否有规定）。
- 与资产转让相关的各方。如果我们出售我们的全部或部分业务、进行资产出售或转让，或以其他方式参与兼并或业务转让，或在破产情况下，作为该交易的一部分，我们可将您的信息转让给一个或多个第三方。如果您个人信息的所有权或对您个人信息的使用以及您就个人信息可有的任何选择发生任何变化，我们将通过电子邮件通知您和/或在我们网站的显著位置发布通知。
- 您同意的其他各方。如果您同意与第三方共享您的信息或者根据法律的规定，包括当您向用户个人档案或服务（例如聊天室、论坛、博客或其他社区工具）的公共空间发布信息时，我们可与此类第三方共享您的信息。

根据法律相关要求或者出于保护服务、义务和/或要求而有必要进行的任何披露应源自以下基准：

- 对信息披露具有约束力和适用性的香港特别行政区内外现在和将来的任何法律；
- 任何法律、监管、政府、税务、执法机构或其他机构或自我监管机构或行业团体或金融服务供应商协会作出或发布的香港特别行政区内外现在和将来的任何指南或指导；

- 与当地或国外的法律、监管、政府、税务、执法机构或其他机构或自我监管机构或行业团体或金融服务供应商协会订立的 Geoswift 在当地或国外法律、监管、政府、税务、执法机构或其他机构或自我监管机构或行业团体或协会辖区内或与之相关的金融、商业、业务或其他利益或活动时履行或强制履行的现在或将来的任何合同或其他承诺；

2.Cookie、日志文件及其他追踪技术的使用

Cookie

Cookie 是指在数据主体访问 Geoswift 网站的某些部分或点击 Geoswift 的在线广告时在数据主体的设备上放置的小型数据文件。

我们使用 Cookie 和类似技术识别数据主体的设备，并用于以下目的：

1. 基本 Cookie。整个 Geoswift 网站均设置了这些基本 Cookie，网站的操作需要使用这些 Cookie，从而：
 - 允许 Geoswift 的网络服务器确定数据主体的网络浏览器是启用还是禁用了 Cookie 设置。这使得 Geoswift 可以了解是否可从数据主体的网络服务器收集数据；
 - 临时允许数据主体保留 Geoswift 网站页面之间的某些信息/偏好，避免重新输入该信息；
 - 在数据主体登录至 Geoswift 网站的安全页面后临时识别数据主体的设备，以便 Geoswift 的网络服务器可以保持与数据主体的网络浏览器的对话，让数据主体可以进行某些活动。
2. 分析/性能 Cookie。这些 Cookie 通过追踪数据主体对 Geoswift 网站的访问并识别数据主体的网络浏览器（若数据主体是 Geoswift 网站的重复访问者）来帮助 Geoswift 改进其网站，以便 Geoswift 可以收集新访问者和重复访问者的统计数据，进而评估网站的有效性。
3. 功能 cookie。这些 Cookie 用于在数据主体返回 Geoswift 网站时识别数据主体。这使得 Geoswift 可以：

- 为数据主体提供个性化的内容，并记住他/她的偏好（例如，语言和地区的选择）；
 - 存储他/她的登录信息和其他偏好，让他/她在返回 Geoswift 网站时无需重新输入该信息。
4. 定向/广告 Cookie。这些 Cookie 记录数据主体对 Geoswift 网站的访问以及他/她对 Geoswift 在线广告的反应，并追踪他/她访问过的页面以及他/她关注过的网站链接。Geoswift 使用此信息的目的在于：
- 让 Geoswift 网站更加贴合数据主体的兴趣；
 - 在 Geoswift 网站或第三方网站上提供他/她最可能感兴趣的在线广告或优惠；
 - 评估 Geoswift 在线营销和广告计划的有效性。

以上 Cookie 可由 Geoswift 或由代表 Geoswift 的第三方（例如，广告网络及网络流量分析服务等外部服务的供应商）放置于数据主体的设备上。我们的第三方合作伙伴可通过 Cookie 等技术收集关于您在该网站及其他网站的活动信息，以便根据您的浏览行为和兴趣向您提供量身定制的广告。如果您不希望该信息被用于投放基于您兴趣的广告，可以发送电子邮件至 privacy.policy@geoswift.com 联系我们。我们不会因此而收集或与第三方共享数据主体的任何个人身份信息。

大多数网络浏览器最初均设置为接受 Cookie。如果您不希望通过使用 Cookie 来收集信息，大多数浏览器都有允许您拒绝使用 Cookie 的简单程序。请注意，如果拒绝使用 Cookie 或其他类似技术，您仍然可以使用我们的网站，但您对我们网站某些功能或区域的使用可能会受到限制。欲了解有关 Cookie 的更多信息，请访问 <http://www.allaboutcookies.org/>。

日志文件及其他追踪技术

和大部分网站一样，我们自动收集特定信息并保存在日志文件中。此类信息可能包括互联网协议 (IP) 地址、浏览器类型、互联网服务供应商 (ISP)、引用/退出页面、操作系统、日期/时间戳和/或点击流数据。我们不会将自动收集的数据链接到我们收集的关于您的其他信息之中。

除 Cookie 外，Geoswift 和我们的第三方服务供应商还采用信标和脚本等技术来收集可帮助我们进行流量测量、研究和分析的信息。我们将用这些类型的技术来分析趋势、管理网站、追踪用户的网站活动并收集关于整个用户群的人口统计信息。我们会收到这些公司基于使用上述技术的单独和汇总报告。

3. 个人信息安全

Geoswift 采取一切合理可行的手段来保护数据，例如，规定只有授权人员才能访问数据以及对存储数据的设备采取安全措施。采用加密技术进行敏感数据传输。我们使用合理的安全程序，帮助保护您向我们提供的信息，防止其发生丢失、滥用、未经授权的访问、披露、更改或破坏。安全措施包括规定只有授权人员才能访问数据以及对存储数据的设备采取安全措施。采用加密技术进行敏感数据传输。

但是，请注意，没有任何数据传输或存储可保证 100% 安全。因此，虽然我们竭力保护您的信息和隐私，但是我们无法保证或担保您在线向我们披露或传输的任何信息的安全性，并且无法对您的信息发生被盗、破坏或疏忽披露的情况负责。若您对于个人信息的安全有任何疑问，请发送电子邮件至 tuition_ops@geoswift.com 联系我们。

只要您的帐户依然处于激活状态，我们会保留向您提供服务所需的信息，遵守并履行我们的法律义务、解决纠纷以及执行我们的协议。

4. 社交媒体功能（小工具）

我们的服务包括社交媒体功能，如 Twitter 和 LinkedIn 关注图标。这些功能可能会收集您的 IP 地址和您在我们网站中浏览的页面，并可能设置 Cookie 以使相应功能正常运行。社交媒体功能和小工具或由第三方托管或直接托管在我们的网站上。您与这些功能的互动均受其提供公司隐私政策的制约。

5. 联合品牌

Geoswift 及其品牌合作伙伴相互协作，为中国客户提供学费支付服务。为向收款人付款，合作伙伴之间可互相传递个人身份信息。在发现异常活动或行为的情况下，开展调查期间，也可能在品牌合作伙伴之间共享个人信息。如果客户希望限制信息的共享，可按下述第 8 节和第 9 节中所述之方式联系 Geoswift。

6. 未成年人

我们不会有意收集、使用或披露 13 岁以下儿童提供的个人信息。我们要求这些人不要向我们提交此类信息。如果您认为我们无意间收集了儿童的信息，请发送电子邮件至 privacy.policy@geoswift.com 联系我们。

7. 隐私政策更新

为反映我们对信息实践的变更，我们可能会更新本隐私政策。如果我们做出任何重大变更，我们会在变更生效之前通过网站上的公告通知您。我们建议您定期查阅本网页，获取我们隐私权实践的最新信息。

8. 第三方网站链接

服务可包含与可能由 Geoswift 或第三方运营和维护的其他网站或在线服务的链接，且其他网站或在线服务不受 Geoswift 控制或维护。本隐私政策不适用于该第三方内容。我们建议您阅读这些第三方网站或服务的隐私政策。

9. 您的选择和您的信息

Geoswift 允许您查看并更正您提供给我们的某些信息。如果您想要更新或删除提供给我们的联系信息中的不准确之处，可发送电子邮件至 privacy.policy@geoswift.com 联系我们。我们会在 30 日内回复您的访问请求。

您也可以通过电子邮件中附带的取消订阅功能或发送电子邮件至 privacy.policy@geoswift.com 联系我们，“退出”接收促销或营销信息邮件。如果您此后申请接收促销或营销信息邮件，该申请将替代“退出”操作。

10.联系我们

如果您对于本隐私政策有任何疑问，请通过下列方式与我们联系，致电：+852 2312 2168，发送电子邮件至：privacy.policy@geoswift.com，或致函至：香港九龙红磡都会道 10 号都会大厦 2116-2118 室。请务必在您的问询中随附此信息：收件人：Compliance Department（合规部）。