PRIVACY POLICY

Last Updated: September 29, 2026
Effective Date: September 29, 2026
Jurisdiction: Hong Kong SAR

PREAMBLE

The Operator is committed to ensuring maximum confidentiality of its users' data. The Operator will handle user data strictly in accordance with the provisions of this Privacy Policy and the requirements of the Personal Data (Privacy) Ordinance of Hong Kong, Cap. 486 (hereinafter referred to as the "PDPO").

The data user of your personal data is Pascal trading Limited / 帕斯卡貿易有限公司.

- Company Status: Private company limited by shares
- Registration Date: April 21, 2026
- Company Registration No. (CR No.): 80236786
- Business Registration No. (BR No.): 80236786-000-04-26-9
- Jurisdiction: Hong Kong (Hong Kong SAR)
- Registering Authority: Companies Registry, Hong Kong

Using the retail website http://travelcard.hk/ (hereinafter referred to as the "Site"), you may act as a Visitor, Respondent, User, or Subscriber.

TERMS AND DEFINITIONS

- Personal Data (PD) — any data relating directly or indirectly to a living individual, from which it is practicable to ascertain the identity of the individual, recorded in any material or electronic form.
- Site — the internet resource located at http://travelcard.hk/, administered by the Operator to provide informational-technical interfaces, e-commerce services, and marketing solutions.
- Interactive Module (Widget) — a frontend technical interface integrated into the Site, designed for data input and automated transmission to the backend hosting infrastructure.
- Technology Partner — an authorized regional provider of cloud infrastructure and specialized fintech routing systems that holds the rights to the underlying backend routing nodes and manages secure API validation under bilateral service contracts.
- Service Products (Vouchers) — cross-border road vouchers or travel documentation files generated by authorized Regional Operators in destination countries (Kazakhstan, Uzbekistan, Kyrgyzstan) based on data submitted via the IT interface of the Site.

1. PROCESSED DATA CATEGORIES

1.1. Feedback Requests: Name, phone number, and email address.
1.2. Personal Account Maintenance: Full name, phone number, email, nationality, gender, date/place of birth, address, passport data (including digital scans), and vehicle parameters (registration parameters, model, make, license plate).
1.3. Inbound Support Calls: Name, phone number, and call recordings.
1.4. Web Analytics (Visitors): Network IP address, browser type/version, operating system, geographical metrics, cookies, and clickstream interactions.

2. PURPOSES AND LEGAL BASES FOR PROCESSING

2.1. Personal and technical data are processed solely to achieve the following explicit commercial objectives:
• Maintenance and monitoring of the User's Personal Account;
• Automated tariff estimation and real-time backend API data transmission required to generate Transit Vouchers;
• Technical optimization of frontend design and prevention of system technical failures;
• Customer support interaction.

2.2. The Legal Basis for data processing is the explicit, voluntary, and informed consent (Consent) granted by the data subject in digital form.
2.3. Personal data is securely archived for a duration not exceeding 3 (three) years from the moment the commercial objective is reached or until consent is explicitly revoked.

3. COOKIES AND WEB ANALYTICS

3.1. Cookies are used for user session authentication, saving preferences, and analyzing traffic logs.
3.2. The Site may use both session cookies and analytical tools of certified third-party IT providers.
3.3. Users have the right to disable cookies via browser settings, though it may affect widget calculation performance.

4. DATA SHARING AND CROSS-BORDER TRANSFERS

4.1. To fulfill our service contracts, the Operator is authorized to share or delegate processing operations to the following classes of data transferees:
• The Technology Partner: Data is routed via secure encrypted API tunnels to our regional fintech infrastructure providers for host-side validation and automated transmission to destination countries;
• Regional Service Operators: Licensed local entities in destination countries required to compile the final Service Products;
• IT Service Providers: Cloud data centers, hosting networks, and secure notification nodes processing data strictly under corporate instructions.

4.2. All cross-border personal data transfers are executed under Section 33 and relative provisions of the PDPO, implementing appropriate technical and contractual safeguards to ensure that foreign data processors maintain security standards equivalent to Hong Kong laws.
4.3. The Operator does not sell or rent personal data to third parties for independent marketing purposes.

5. RIGHTS OF DATA SUBJECTS

5.1. Under the PDPO, every User has the absolute right to: submit a Data Access Request, submit a Data Correction Request, or revoke their data processing consent at any time.
5.2. Requests are sent to info@travelcard.hk and processed within the statutory limit of 40 days as defined by Hong Kong regulations.

6. DATA SECURITY AND LIABILITY

6.1. The Operator employs robust administrative, technical, and cryptographic security measures (SSL/TLS protocols) to prevent accidental loss or illegal destruction of data.

7. UPDATES TO THE POLICY

7.1. The Operator reserves the right to modify this Policy unilaterally to comply with legislative updates in Hong Kong.