

PRIVACY POLICY

Hong Kong (Hong Kong SAR)

1 September 2026

PREAMBLE

The Operator is committed to ensuring the highest possible level of confidentiality of its users' data. The Operator will use users' data only in accordance with this Privacy Policy and the requirements of the Personal Data (Privacy) Ordinance (Cap. 486) of Hong Kong (hereinafter referred to as the "PDPO").

The operator of your personal data is Pascal Trading Limited / 帕斯卡貿易有限公司 (hereinafter referred to as the "Operator").

- Full company name: Pascal Trading Limited / 帕斯卡貿易有限公司
- Legal status: Private company limited by shares
- Date of incorporation: 21 April 2026
- Company Registration Number (CR No.): 80236786
- Country/jurisdiction of incorporation: Hong Kong (Hong Kong SAR)
- Registration authority: Companies Registry, Hong Kong
- Business Registration Number (BR No.): 80236786-000-04-26-9

When using the retail website osago.hk (hereinafter referred to as the "Website"), you may be a Visitor, Respondent, User or Subscriber:

- You are a Visitor when you browse pages of the Website without completing forms in interactive modules;
- You are a Respondent when you submit your data through feedback forms or interactive data modules;
- You are a User when you register for a Personal Account on the Website to access digital services;
- You are a Subscriber when you contact the Operator through telephone or voice communication channels.

TERMS AND DEFINITIONS

- Personal Data — any data relating directly or indirectly to a living individual (data subject), from which the identity of that individual can be ascertained, recorded in any physical or electronic form.
- Collection of Personal Data — actions aimed at obtaining Personal Data from data subjects or from permitted sources.
- Processing of Personal Data — any operation or set of operations performed on Personal Data, including collection, organisation, accumulation, storage, clarification (updating, alteration), use, transfer (dissemination, provision, access), anonymisation, blocking, deletion and destruction.
- Website — the internet resource located at osago.hk, lawfully owned and administered by the Operator for the purpose of providing informational and technical interfaces, e-commerce services and marketing solutions.
- Interactive Module (Widget) — a software and technical interface integrated into the Website and intended for the entry and automated transfer of technical and Personal Data to the systems of regional technology partners.
- Technology Partner — a regional provider of financial and information technologies from Kyrgyzstan (GreenGo Asia LLC, TIN 01607202510136), with which the Operator has entered into a Technical Integration & Commercial Partnership Agreement. The Technology Partner provides backend data routing, IT infrastructure and data validation for the issuance of final Service Products.

- Service Products (Vouchers) — mandatory cross-border road vouchers and road insurance policies issued by authorised regional operators and insurers in destination countries (Kazakhstan, Uzbekistan, Kyrgyzstan) on the basis of data transmitted through the Website's IT interface.

1. DATA PROCESSED

When using the Website, the Operator may process the following categories of data:

1.1. Processing Respondents' callback requests:

- Name;
- Telephone number;
- Email address.

1.2. Creation and maintenance of the User's Personal Account:

- Surname, given name and patronymic (if applicable);
- Telephone number;
- Email address;
- Citizenship / country of permanent residence;
- Gender, date and place of birth;
- Registered / residential address;
- Passport details (including a digital copy/scan of the document containing a photograph);
- Vehicle data (make, model, state registration number, technical specifications, scanned copies of vehicle documents).

1.3. Processing incoming calls from Subscribers:

- Name;
- Telephone number (including call recording for quality control and recording of consent).

1.4. Website improvement, web analytics and personalisation (Visitors):

- Device IP address, browser type and version, operating system;
- Geographical location (based on network data);
- Data regarding interaction with the Website interface (referral source, pages viewed, clicks, time spent on the Website);
- Cookies and similar metrics-system data (session and persistent cookies, web beacons).

2. PURPOSES AND LEGAL BASES FOR DATA PROCESSING

2.1. The Operator processes Personal Data exclusively for the following specific purposes:

- Providing access to the Website's IT interface and ensuring its proper technical operation;
- Creating, maintaining and protecting the User's Personal Account;
- Ensuring informational and technical interaction and processing User requests for automated price calculation and creation of orders for cross-border road vouchers;
- Analysing user experience, optimising interfaces and preventing technical failures;
- Communicating on customer support matters.

2.2. The legal basis for data processing is the voluntary, informed and unambiguous consent of the Personal Data subject, expressed electronically (by activating a checkbox before submitting data on the Website) or recorded during a voice call.

2.3. The period of processing and storage of data shall not exceed 3 (three) years from achievement of the purposes of processing or until consent is withdrawn by the Personal Data subject, unless a longer retention period is required by applicable Hong Kong law.

2.4. Data destruction procedure: upon expiry of the established periods or withdrawal of consent, data shall be irreversibly destroyed from the Operator's electronic datasets and databases using specialised software tools.

3. COOKIES AND WEB ANALYTICS TECHNOLOGIES

3.1. Cookies are used to authenticate Users, retain their personal settings (language, region), analyse Website traffic and improve the effectiveness of advertising campaigns.

3.2. The Website may use both its own session cookies and analytical tools of third-party IT providers (metrics systems).

3.3. Users and Visitors may disable or restrict the use of cookies at any time through their internet browser settings. Restricting cookies may cause certain elements of the Website interface to function incorrectly.

4. CROSS-BORDER TRANSFER AND DISCLOSURE OF DATA TO THIRD PARTIES

4.1. To achieve the purposes specified in this Policy and ensure operation of the B2C service, the Operator may transfer data to and entrust its processing to the following categories of third parties:

- Technology Partner (GreenGo Asia LLC, Kyrgyzstan) — under the Technical Integration Agreement, Users' Personal Data and vehicle specifications are transmitted through secure communication channels (API) for technical validation and automated routing to the information systems of final service operators in destination countries.
- Third-party cloud providers and data centres — to ensure secure storage, backup and protection of the data-processing infrastructure.
- IT service providers (notification distribution services, analytics platforms) — to the limited extent necessary solely for technical maintenance of the Personal Account and sending service notifications (email / SMS).

4.2. The Operator carries out cross-border transfers of data in accordance with the requirements of Section 33 and other provisions of the Hong Kong PDPO, applying appropriate contractual and technical measures to ensure that foreign data recipients provide a level of Personal Data protection equivalent to Hong Kong standards.

4.3. The Operator does not sell, rent or provide users' Personal Data to third parties for marketing or commercial purposes unrelated to the operation of the IT platform, except where expressly required by applicable Hong Kong law (including official requests from regulatory or law-enforcement authorities).

5. RIGHTS OF PERSONAL DATA SUBJECTS

5.1. In accordance with the Hong Kong PDPO, each data subject has inherent rights in relation to their Personal Data, including:

- Right of access to data (Data Access Request): the right to request confirmation as to whether the Operator processes the data and to obtain a copy of their Personal Data;
- Right to correction of data (Data Correction Request): the right to require prompt correction or updating of inaccurate, incomplete or outdated data;
- Right to withdraw consent: the right to withdraw previously provided consent to data processing at any time by sending an electronic request to the Operator;
- Right to cease processing for marketing purposes: the User may opt out of receiving Informational Materials at any time.

5.2. To exercise these rights, the data subject may send an official request to the Operator's support email address: help@osago.hk. The Operator undertakes to review and respond to the request within the period prescribed by Hong Kong law (no more than 40 days from receipt of the request).

6. SECURITY AND LIABILITY

6.1. The Operator implements strict organisational, administrative and technical security measures to prevent unauthorised or accidental access, alteration, disclosure, loss or destruction of Personal Data (including the use of SSL/TLS data encryption protocols, restriction of employee access rights and security audits).

6.2. The Operator's obligations to maintain confidentiality and protect data arise from the moment of initial collection and remain in force until the data is finally deleted or anonymised.

7. UPDATES TO THE PRIVACY POLICY

- 7.1. The Operator reserves the right to amend this Policy unilaterally in the event of changes to the Website's business processes, the technical integration structure or Hong Kong legislation.
- 7.2. New versions of this document enter into force upon publication in open access on the Website at osago.hk. Users are advised to check this page regularly for updates.