

Privacy Notice

隐私声明

Privacy for our clients and other individuals is a priority for us, and we are dedicated to ensuring that all personal data is being processed with the upmost respect for the rights of individuals. This Privacy Policy explains, how Velorum Corporation N.V., with its registered office at Heelsumstraat 51, E-Commerce Park Vredenburg, Curacao.. ID No.: 127675, (the "Company" or "we") processes personal data.

我们的用户及其他人的隐私对我们至关重要，我们致力确保所有个人数据的处理将遵循个人的权利。本隐私政策将解释Velorum Corporation N.V., Heelsumstraat 51, E-Commerce Park Vredenburg, Curacao. 公司注册号为 127675, (下称“公司”或“我们”) 如何处理个人数据。

We only collect, use and process your personal information in accordance with actual data protection legislation. This includes but is not limited to Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation, the "GDPR") and applicable national data protection legislation.

我们仅根据现行数据保护法规收集、使用及处理您的个人信息。该法规包括但不限于欧盟于2016年4月27日通过的关于保护个人数据处理及数据转移的条例（欧盟法规编号：(EU) 2016/679，通用数据保护条例，简称GDPR），以及其他适用的国家数据保护法规。

Your personal data are obtained directly from you. In this case, you provide your personal data on a voluntary basis. Specific cases of non-disclosure of personal data will lead to the inability of the Company to provide services.

我们从您个人处直接获取您的个人数据。在此情况下，您自愿提供您的个人数据。特定情况下不披露个人数据将导致公司无法提供服务。

The Company acts on behalf of its customers in the capacity of data controller.

公司代表其用户作为数据控制者。

For what purposes are personal data processed?

我们处理您个人数据的目的是什么？

The Company processes your personal data as needed for the following purposes:

公司基于以下目的按需处理您的个人数据：

- (i) Provision of services – this includes the creation and management of your user account (legal basis under Article 6(1) letter b) of GDPR: processing necessary for contractual performance);
- (ii) Determination and enforcement of the Company's legal claims (legal basis under Article 6(1) letter f) of GDPR: legitimate interest); and
- (iii) Compliance with legislation under Article 6(1) letter c) of GDPR.

- (i) 提供服务，包括创设及管理您的用户账户（法律依据为GDPR第6.1.b条：为履行合同义务之目的）；
- (ii) 确定并执行公司的法律诉求（法律依据为GDPR第6.1.f条：合法利益）；及
- (iii) 根据GDPR第6.1.c条的合规要求。

If necessary, the Company will ask you for permission to process your personal data. 如需要，公司就处理您的个人数据将征求您的同意。

What categories of personal data do we process? 我们处理您的哪些个人数据？

Using the services provided by the Company may require the following data: 为使用公司所提供的服务，您需要向公司提供以下数据：

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| (i) Telephone number; | (i) 电话号码； |
| (ii) Email address; | (ii) 电子邮箱； |
| (iii) Year of birth; and | (iii) 出生年月；及 |
| (iv) Gender. | (iv) 性别。 |

When do we collect data? 我们何时收集您的数据？

All data that we receive we get directly or indirectly from you when you choose to use our services. This includes following situations: 当您选择使用我们的服务时，我们从您处直接或间接获取数据，包括以下情况：

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| (i) When you register with our mobile application Lkapp; | (i) 当您注册我们的移动应用 Lkapp； |
| (ii) When you interact with us via our contact details or social media platforms. | (ii) 当您通过我们的联系信息或社交媒体平台与我们沟通。 |

Our services are not aimed at children younger than 15 years old and if we collect data about individuals younger than 15 years, we do it unknowingly and without purpose. 我们不向未满15周岁的儿童提供服务，如果我们收集不满15周岁儿童的信息，我们是在不知情且无目的的情况下进行的。

Who do we share personal data with? 我们与谁共享所收到的个人数据？

In order to provide you the services you request, your personal data may be provided to: 为了向您提供所需的服务，我们可向以下人员提供您的个人数据：

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| (i) selected employees of the Company; | (i) 公司的特定员工； |
| (ii) service providers – those ensuring provision of the services provided by the Company, in particular software services providers, marketing providers, customer service providers, distributors of marketing and other materials such as newsletters, including employees of such persons; | (ii) 服务提供商，该提供商以确保公司提供服务，尤其是软件服务提供商、营销服务提供商、客户服务提供商、营销及其他材料（例如简报）的分销商，并包括上述人员的员工； |
| (iii) tax advisors, professional advisers (e.g. auditors, lawyers), including employees of such persons; | (iii) 税务咨询师及专业服务人员（如审计师、律师等），包括上述人员的员工； |

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| (iv) marketing partners; | (iv) 营销合作伙伴； |
| (v) entities providing payment services; and | (v) 提供支付服务的公司；及 |
| (vi) social media providers, using the services of the Company together with a social network may require the Company to share your personal data with social media providers. | (vi) 社交媒体提供商，通过社交网络使用公司的服务，我们需要向有关社交媒体提供您的个人数据。 |

How long are your data retained?

We keep your data for the period of time necessary to fulfil the purposes of processing as defined above; i.e. this data will be erased after the deletion of your user account, unless the Company has a legal obligation or legitimate interest to keep the personal data longer (for example to protect the Company's legal claims).

我们将保留多久您的数据？

除非公司有法律义务或其他合法利益（例如保护公司合法权利）要对您的个人数据保留更长的时间，我们对您的数据保留必要的时间以满足上述目的。在您注销账号后，有关数据将被删除。

Are your personal data secured?

In accordance with best practices, we maintain security safeguards that protect your data. We strictly limit who is allowed to access the information and we keep number of authorised individuals to a minimum. In addition, we maintain physical and cyber safeguards, such as partial anonymisation of data, server protection devices, and software to minimise possible loss, misuse or alteration of your data.

关于您的个人数据安全？

根据最佳实践，公司将维持相应的安全措施以确保您的数据安全。我们严格限制有权接触数据的人员，并将授权人员的人数控制在最小的范围内。除此之外，我们维持实地及网络安全措施，例如部分数据匿名化、服务器保护设备、及软件等以将个人数据的丢失、滥用或变更的可能降到最小。

Your personal data may be stored and processed in countries where the Company carries on business or where its service providers are located. These countries may apply different privacy rules than the Czech Republic, European Union or European Economic Area ("EEA"). The Company has put in place appropriate contractual and other measures to protect your personal data when personal data are transferred to related parties or third parties located in other countries.

我们将把您的个人数据存储在公司开展业务的国家或服务提供商所在的国家，并在有关国家处理。这些国家的隐私规则可能不同于捷克共和国、欧盟或欧洲经济体国家。当个人数据转移到合作方或第三方所在的其他国家时，公司已采取适当的合同或其他方面的措施以保护您的个人数据。

In the case of cross-border transmission of data from the EEA to countries where the European Commission recognises an insufficient level of protection of personal data, the controller ensures that appropriate measures are taken, including ensuring that data recipients are bound by EU standard contractual clauses to protect your personal data. A copy of these measures can be requested from the administrator via email at info@lkapp.com. In order to learn more about these contractual clauses, please visit the European Commission information website, https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en.

若我们将信息从欧洲经济体国家转移到其他国家且该国家被欧盟委员会认定为缺乏个人数据保障措施，在此情况下，数据控制人确保采取适当的措施，包括确保数据接受方受欧洲标准合同条款约束以保护您的个人数据。有关措施可通过发送邮件到info@lkapp.com索取获得。该条款的更多详情可在欧盟委员会的以下网站上找到：
https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en

What are your rights?

您的权利是什么？

You have the following rights in relation to your data:

就您的数据您享有以下权利：

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| (i) to require access in order to correct or delete your personal data, as well as to restrict its processing; however, your right to delete or restrict processing is applicable only if the Company is not required to process it on another legal basis (i.e. compliance with a legal obligation); | (i) 获取访问权限以更正或删除您的个人数据，以及限制个人数据的处理。但您删除或限制处理的权利仅在公司无需根据另一法律依据（即履行某一法律义务）处理有关数据的前提下行使； |
| (ii) depending on the extent of processing of your data in order to manage your user account and comply with any contracts, you are entitled to portability of your personal data; and | (ii) 对您个人数据享有可携权，但该权利取决于处理您的数据以管理用户账户和遵守任何合同的程度；及 |
| (iii) to object to the processing of your personal data processed with a legitimate interest, as well as against processing for marketing purposes. | (iii) 就合法利益反对处理您的个人数据，以及反对为营销目的处理数据。 |

If you wish to exercise your rights above or have any questions regarding the processing of your personal data, please contact the Administrator by email at info@lkapp.com. You are also entitled to file a complaint with the relevant data protection authority, the Czech Office for the Protection of Personal Data (www.uoou.cz) or the Austrian Data Protection Authority (www.dsb.gv.at).

若您意欲行使上述权利或就个人数据处理有任何问题，请发送邮件至管理员（邮箱：info@lkapp.com）。您也有权向数据保护机构投诉，包括捷克共和国个人数据保护办公室（www.uoou.cz）或奥地利个人数据保护机构（www.dsb.gv.at）。

The information that the Company is required to provide to you regarding the processing of your personal data may change over time or become outdated. For this reason, the Company reserves the right to modify and change these conditions at any time. If these conditions are changed, the Company will alert you, e.g., by email or through your user account.

公司向您提供个人数据处理的有关内容会因为时间或过时而需要修改。公司保留随时修改和修订有关规则的权利。若修改，公司将通过例如电子邮件或用户账户的方式通知您。

This Privacy Notice is executed in English and Chinese versions. In case of any discrepancies, the English version shall prevail.

本隐私声明以中英文书写。若有差异，以英文为准。