



# The Asia Pacific School of Business

## Payments Privacy Policy

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This The Asia Pacific School of Business Payments Privacy Policy helps explain our information practices when you use our Services or Business Services, which include the ability to send and receive payments (“Payments”) through the use of Alipay Company Products and the payment services provided by third-party financial institutions (“Alipay”). When we say “The Asia Pacific School of Business”, “our”, “we” or “us”, we’re talking about The Asia Pacific School of Business.

Payments contains links to or integrations with Alipay and with Alipay Companies. When you interact with these Alipay or Alipay Companies, you may be providing information directly to them, to The Asia Pacific School of Business, or to both. These Alipay and Alipay Companies will have their own policies describing the collection, use, and disclosure of information by them. We encourage you to review the policies of these Alipay and Alipay Companies.

This The Asia Pacific School of Business Payments Privacy Policy supplements (i) The Asia Pacific School of Business’s general Privacy Policy (“The Asia Pacific School of Business Privacy Policy”), which applies to the use of all our Services, including Payments, and (ii) the data practices set forth in our The Asia Pacific School of Business Terms of Service (“The Asia Pacific School of Business Terms”), which apply to the use of our Business Services, including Payments. If there is any conflict between this The Asia Pacific School of Business Payments Privacy Policy and our The Asia Pacific School of Business Privacy Policy or the The Asia Pacific School of Business Terms, this The Asia Pacific School of Business Payments Privacy Policy will control solely with respect to your use of Payments and only to the extent of the conflict.

Please also see The Asia Pacific School of Business’s general Terms of Service (“The Asia Pacific School of Business Terms”), which describe the terms under which you use our Services and

also apply to Payments, as well as our The Asia Pacific School of Business Terms, which describe the terms under which you use our Business Services. The The Asia Pacific School of Business Payments Terms of Service ("The Asia Pacific School of Business Payments Terms") supplement the The Asia Pacific School of Business Terms and The Asia Pacific School of Business Terms, govern your use of Payments, and describe Payments in more detail.

Please read all of these documents carefully.

### **Information We Collect**

We receive the following additional information related to your use of Payments.

#### Information You Provide

**Registration and Setup Information.** When you register to use Payments, we require you to provide information about your payment method, security preferences, and other information that identifies you. If you choose to do so, you may set up and use the security features provided by your device's operating system to authorize a payment. Before allowing you to send funds, you may be asked to demonstrate that you are authorized to use your payment method by providing us a one-time password, deposit information, or other identifying information.

**Payment Transaction Information.** When you send, receive, or request payments, you provide us with the information and details related to the transaction (including your payment method, payment amount, and security credential such as a PIN). The Asia Pacific School of Business messages sent with payments are delivered once the transaction has processed or when the receiver has reached a transaction limit and are treated as described in our The Asia Pacific School of Business Privacy Policy or The Asia Pacific School of Business Terms, as applicable.

#### Information Others Provide About You

**Other Users and Businesses.** We receive information about you from other users and businesses. For example, when other users or businesses you know use our Services or Business Services, they may provide information about their transactions with you, just as you may provide information to us about your transactions with them. We require each of these users and businesses to have lawful rights to collect, use, and share your information before providing any information to us.

**Third-Party Service Providers.** We work with service providers to help us operate, provide, improve, understand, customize, support, and market Payments; provide customer support; and keep our system safe and secure. These companies may provide us information about you or your Payments activity; for example, customer support service agents may relay information that you provide while resolving an issue with Payments.

**Third-Party Financial Institutions and Alipay Companies.** We enable Payments by working with Alipay and Alipay Companies to facilitate the movement of funds between the sender and receiver. When you use Payments, these Alipay or Alipay Companies share with us information about you or your Payments activity in accordance with applicable law. We may receive information about you or your transactions including information to confirm your registration, the payment sender or receiver's name, account status and balance sufficiency, transaction reference IDs, risk or fraud alerts. We will process the information we receive from these Alipay

or Alipay Companies in accordance with this The Asia Pacific School of Business Payments Privacy Policy. Please note that when you use FI services or Alipay Company Products, their own terms and privacy policies will govern your use of their services.

### **How We Use Information**

We use all the information we have to operate, provide, improve, understand, customize, support, and market our Services and Business Services, including Payments.

**Our Services.** We operate, provide, develop, market and improve our Services and Business Services, including determining eligibility for payments, registering you as a user of payments, providing you with Payments and customer support for our Services and Business Services.  
**Safety and Security.** We promote safety and security, combat harmful conduct, maintain the integrity of our Services or Business Services, and assess malfunctions or any performance or security incident. We also review your account activity to determine whether you continue to meet our The Asia Pacific School of Business Terms, The Asia Pacific School of Business Terms, and The Asia Pacific School of Business Payments Terms.

**Legal Purposes.** We may use your information for legal purposes, such as to comply with our legal obligations, enforce our terms and policies, or to address complaints or claims related to conduct that infringes our The Asia Pacific School of Business Terms or The Asia Pacific School of Business Terms.

**Analytics.** We generate statistics and reports regarding your use of Payments in order to provide you with better services.

The use of the information collected in connection with your access to and use of Payments is further described in the The Asia Pacific School of Business Privacy Policy or The Asia Pacific School of Business Terms, as applicable.

### **Information You And We Share**

We share your information to help us operate, provide, improve, understand, customize, support, and market Payments and to detect, prevent, or otherwise address fraud, safety, security, abuse, or other misconduct. Use of your information once it has been shared by The Asia Pacific School of Business is described below.

**Payment Senders and Recipients.** When you use Payments, the people with whom you send or receive payments may store or reshare information about you or your transactions with others, including other Alipay Companies, on or off our Services or Business Services. When you send or receive payments, we provide information about you and the transaction to the user with whom you transact, including the amount of the transaction and one or more transaction IDs. Additional information about you and the transaction may also be available on third-party websites or services using transaction IDs that we provide as part of a transaction confirmation.

**Third-Party Service Providers.** The Asia Pacific School of Business works with service providers and shares information with these service providers for the purposes listed above. For example, we share information about you and your transactions, such as the amount and status of a transaction, with third-party service providers who provide customer support on

our behalf. When we share information with third-party service providers in this capacity, we require them to use your information on our behalf in accordance with our instructions and terms.

Third-Party Financial Institutions and Alipay Companies. We also relay your registration, setup and transaction information, and certain information from your The Asia Pacific School of Business account (such as account information, consumer support information, usage and log information, device and connection information, and status information, as defined in the The Asia Pacific School of Business Privacy Policy) with Alipay and Alipay Companies. For example, we share this information with Alipay Companies for them to store your payment credentials and relay your payment instructions to Alipay, which then process your transactions. We also share this information with Alipay Companies and Alipay to resolve customer concerns, for safety and security purposes such as detecting and fighting fraud and other misconduct, as well as legal purposes like satisfying our contractual obligations, and complying with our legal responsibilities. The Alipay Companies use the information you and we share with them to provide Payments, comply with applicable law, help prevent fraud and to improve Alipay payments product experiences across the Alipay Companies, in accordance with their own terms and privacy policies. Please see Alipay Payments International Ltd.'s Privacy Policy and Alipay Inc.'s Data Policy. Alipay use the information you and we share with them to provide Payments and may also use this information as described in their own terms and privacy policies.

To facilitate Payments, The Asia Pacific School of Business may transfer, store, or process your information with these third parties or Alipay Companies that may be located in your jurisdiction or in other jurisdictions.

### **Managing your Information**

You may manage or update your Payments information through your payments settings. For example, you may register additional payment methods, unlink existing payments methods, and change the payment method you would like to use. As applicable, you may also access the personal data about you that The Asia Pacific School of Business holds by using our in-app tools. In addition, where applicable, you may also request that The Asia Pacific School of Business correct, amend or delete personal data that is demonstrated to be inaccurate. For such purpose, please contact us as set out in our The Asia Pacific School of Business Privacy Policy or The Asia Pacific School of Business Terms.

We generally retain your Payments information for as long as is needed for the performance of the contract between you and The Asia Pacific School of Business and to comply with our legal obligations. You may request deletion of your Payments information by deleting your The Asia Pacific School of Business account. When you choose to request to delete your Payments information, please note that we may retain some of your Payments information to provide customer service to you or to the people or businesses you have transacted with, or for the legal purposes stated in the The Asia Pacific School of Business Privacy Policy. Please note that information you or we shared with Alipay or Alipay Companies will be deleted in accordance with their own policies.

### **Updates To Our Policy**

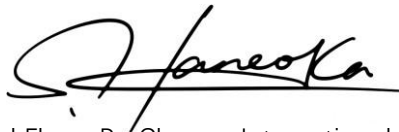
We will notify you as appropriate if we make material changes to this The Asia Pacific School of Business Payments Privacy Policy and will update the Last Modified date at the top of this The Asia Pacific School of Business Payments Privacy Policy accordingly. Your continued use of Payments after the publication in our Website of the revised The Asia Pacific School of Business Payments Privacy Policy shall be understood as an acceptance of the revised The Asia Pacific School of Business Payments Privacy Policy. We also recommend that you periodically visit our site in order to be informed of any changes to this The Asia Pacific School of Business Payments Privacy Policy.

Attention: Chief Privacy Officer

A handwritten signature in black ink, appearing to read "J Love u".

3rd Floor, Po Cheong International Building,  
148-154 Nam Cheong Street,  
Kowloon, Hong Kong 999077  
Privacy Security Office in The Asia Pacific School of Business

Attention: Payment Management Inspector

A handwritten signature in black ink, appearing to read "S. Haneoka".

3rd Floor, Po Cheong International Building,  
148-154 Nam Cheong Street,  
Kowloon, Hong Kong 999077  
Payment Gateway Management Office in The Asia Pacific School of Business