AGREEMENT on Collection and Processing of Personal Data (Hong Kong) This Agreement is entered into between: WIN FOREVER TRUST COMPANY LIMITED, a company registered in the Hong Kong Special Administrative Region of the People's Republic of China, at: HK 168–200 Connaught Road Central, West Tower, Shun Tak Centre, Flat/Rm 3007, 30/F (hereinafter referred to as the "Operator" or the "Company"), and the Individual (hereinafter referred to as the "Data Subject" or "You"), using services related to the opening of a cryptocurrency wallet and custody of Personal Security Assets (PSA) within the framework of cooperation with FINFRESH Microcredit Company LLC and CYBER PAY PAYMENT SERVICES LIMITED. By registering a Personal Account on https://fin-fresh.ru, you perform conclusive actions that signify your full and unconditional acceptance of all terms of this Agreement. Please read this Agreement carefully and proceed with registration only if you accept all its terms in full and without modification.	个人数据收集与处理协议 （香港） 本协议由以下双方签订： **WIN FOREVER TRUST COMPANY LIMITED**，一家依据中华人民共和国香港特别行政区法律注册成立的公司，注册地址：香港干诺道中 168–200 号信德中心西翼 30 楼 3007 室（以下简称"**运营方**"或"**公司**"）； 与 **自然人**（以下简称"**数据主体**"或"**您**"），使用与开设加密货币钱包及托管个人担保资产（PSA）相关的服务，该服务系在与 FINFRESH 小额信贷有限责任公司及 CYBER PAY PAYMENT SERVICES LIMITED 合作框架下提供。 您在 https://fin-fresh.ru 网站注册个人账户即构成明确行为，表示您**完全且无条件接受**本协议全部条款。 请仔细阅读本协议，仅在您完全接受且不作任何修改的前提下继续注册。

1. Scope of Application This Agreement governs the processing of your personal data by the Operator in connection with: - use of the FinFresh.ru and cyberpay.cloud platforms; - registration of a Personal Account; - conclusion of a loan agreement with the Creditor (FINFRESH Microcredit Company LLC); - transfer of PSA to a cryptocurrency wallet managed by the Operator; - performance of obligations under the Agency Agreement and interaction with the Guarantor (CYBER PAY). Visiting the websites, registration, provision of data, or use of services constitutes your voluntary and informed consent to the terms of this Agreement. 2. Categories of Personal Data Processed The Operator may collect and process the following categories of data: 2.1. Data provided by you directly: - Full name, date of birth, citizenship, gender; - Passport and other identity documents; - Contact information (email, phone number); - Residential and registration address; - Financial information (income level, employment status); - Digital asset data (types, volumes, wallet hash addresses).	1. 适用范围 本协议规范运营方在以下情形中对您个人数据的处理： - 使用 FinFresh.ru 及 cyberpay.cloud 平台； - 注册个人账户； - 与债权人（FINFRESH 小额信贷有限责任公司）签订贷款协议； - 将 PSA 转移至由运营方管理的加密货币钱包； - 履行代理协议项下义务及与担保方（CYBER PAY）的协作。 访问网站、注册、提供数据或使用服务，即视为您自愿且知情地同意本协议条款。 2. 处理的个人数据类别 运营方可收集并处理以下类别的数据： 2.1. 您直接提供的数据： - 姓名、出生日期、国籍、性别； - 护照及其他身份证明文件； - 联系方式（电子邮箱、电话号码）； - 居住及注册地址； - 财务信息（收入水平、就业状况）；

	- 数字资产数据（类型、数量、钱包哈希地址）。
2.2. Automatically collected data: - IP address of your device; - Information from cookies and similar technologies; - Browser, operating system, and device type; - Session duration, timestamps, and visited pages.	2.2. 自动收集的数据： - 您设备的 IP 地址； - Cookie 及类似技术所获取的信息； - 浏览器、操作系统及设备类型； - 会话时长、访问时间及浏览页面。
2.3. Data received from third parties: - Credit bureau reports (with your consent); - Data from the Creditor (FINFRESH) regarding loan status, repayment schedule, and Technical Default; - Data from the Agent (Win Forever) on PSA volume, market value, and sale proceeds; - Data from the Guarantor (CYBER PAY) on sale proceeds and debt repayment.	2.3. 从第三方获取的数据： - 征信机构报告（经您同意后）； - 债权人（FINFRESH）提供的贷款状态、还款计划及技术性违约信息； - 代理方（Win Forever）提供的 PSA 数量、市场价值及出售所得信息； - 担保方（CYBER PAY）提供的出售所得及债务偿还信息。
Note: The Operator does not verify the accuracy of data provided by you or third parties but relies on its correctness to fulfill obligations.	注：运营方不对您或第三方所提供数据的准确性进行核实，但为履行义务而依赖其正确性。
3. Purposes of Processing Processing is carried out exclusively for the following purposes: - Opening and maintaining a cryptocurrency wallet for your PSA; - Fulfilling obligations under the Agency Agreement;	3. 处理目的 数据处理仅用于以下目的： - 为您开设并维护 PSA 加密货币钱包； - 履行代理协议项下义务； - 监控 PSA 市场价值及担保充足性；

- Monitoring PSA market value and collateral adequacy; - Notifying you of Technical Default; - Organizing PSA sale in case of default and transferring proceeds to the Guarantor; - Compliance with AML/KYC and other applicable laws; - Cybersecurity and fraud prevention; - Service improvement based on anonymized analytics; - Marketing communications (only with separate consent).	- 通知您技术性违约事件； - 在违约情况下组织 PSA 出售并将所得转交担保方； - 遵守反洗钱/客户尽职调查（AML/KYC）及其他适用法律； - 网络安全与欺诈防范； - 基于匿名化数据分析改进服务； - 营销信息推送（仅在另行获得您同意的前提下）。
4. Legal Basis for Processing Processing is based on: - Your voluntary consent given during registration or contract signing; - Necessity for performance of a contract to which you are a party; - Compliance with legal obligations under Hong Kong law; - Protection of the Operator's legitimate interests in case of default-related risks.	4. 处理的法律依据 数据处理基于以下合法依据： - 您在注册或签约时自愿给予的同意； - 履行您作为一方当事人的合同所必需； - 遵守香港法律规定的法定义务； - 在违约风险情况下保护运营方的合法利益。
5. Disclosure to Third Parties Your data may be disclosed to: - The Creditor (FINFRESH, Russia) — for loan and default coordination; - The Guarantor (CYBER PAY, DIFC, UAE) — for debt repayment; - PSA Buyers — only after Technical Default and solely for asset identification (without revealing your identity); - Regulatory or law enforcement authorities — upon official request.	5. 向第三方披露 您的数据可能披露给以下对象： - 债权人（FINFRESH，俄罗斯）——用于协调贷款及违约事宜； - 担保方（CYBER PAY，DIFC，阿联酋）——用于偿还债务； - PSA 买方——仅在发生技术性违约后，且仅限于资产识别所需（不披露您的身份）；

Cross-border data transfers outside Hong Kong occur only with an adequate level of protection, including: - Contracts with recipients containing standard confidentiality clauses; - Implementation of reasonable technical safeguards.	- 监管或执法机构——**依据正式**请求。 **向香港境外的数据**传输仅在具备充分保护水平的前提下进行，包括： - **与接收方**签订包含标准保密条款的合同； - 实施合理的技术保护措施。
6. Your Rights as a Data Subject (under Cap. 486) You have the right to: - Access your personal data; - Request correction of inaccurate or incomplete data; - Request restriction of processing if accuracy is contested; - Object to marketing processing via your Personal Account; - Withdraw consent at any time via your Personal Account or written request. Withdrawal of consent may result in the inability to continue providing services, including PSA custody and participation in the loan collateral mechanism.	6. **您作**为数据主体的权利（依据《个人资料（私隐）条例》第 486 章） 您有权： - 访问您的个人数据； - **要求更正不准确或不完整的数据**； - **在**质疑数据准确性时要求限制处理； - **通**过个人账户反对用于营销目的的数据处理； - **随**时通过个人账户或书面请求撤回同意。 **撤回同意可能**导致无法继续提供服务，包括 PSA **托管及参与**贷款担保机制。
7. Data Retention Period Data is retained: - For the entire duration of contractual relations; - For at least 5 years after full loan repayment or termination of cooperation, in compliance with Hong Kong AML and financial monitoring requirements.	7. **数据保留期限** 数据将保留： - **在整个合同关系存**续期间； - **在贷款全额偿还或合作关系终止后**至少 5 年**，**以符合香港反洗**钱及金融监控要求。 **期满后，**数据将被安全销毁或匿名化。

After this period, data is securely destroyed or anonymized.	
8. Data Protection Measures The Operator implements comprehensive safeguards: - Technical: industry-standard encryption, two-factor authentication at registration, regular security audits; - Organizational: access controls, staff training, internal compliance policies; - Legal: confidentiality agreements with contractors and partners.	**8. 数据保护措施** 运营方实施综合性保障措施： - 技术措施：符合行业标准的加密、注册时双重身份验证、定期安全审计； - 组织措施：访问权限控制、员工培训、内部合规政策； - 法律措施：与承包商及合作伙伴签订保密协议。
9. Governing Law and Dispute Resolution This Agreement is governed by the laws of the Hong Kong Special Administrative Region (PRC). All disputes arising from or in connection with this Agreement shall be resolved by the courts of Hong Kong.	**9. 适用法律与争议解决** 本协议受中华人民共和国香港特别行政区法律管辖。 因本协议引起或与之相关的所有争议，应提交香港法院解决。
10. Use of Cookies and Web Analytics The websites FinFresh.ru and cyberpay.cloud use cookies and similar technologies (including pixel tags and localStorage) for: - Ensuring proper functionality (e.g., account login); - Remembering your preferences; - Collecting anonymized visit statistics via analytics tools (e.g., Google Analytics, Yandex.Metrica); - Fraud prevention and security; - Personalized content and ads (only with separate consent).	**10. Cookie 与网络分析的使用** FinFresh.ru 和 cyberpay.cloud 网站使用 Cookie 及类似技术（包括像素标签和 localStorage），用于： - 确保网站功能正常（如账户登录）； - 记住您的偏好设置； - 通过分析工具（如 Google Analytics、Yandex.Metrica）收集匿名访问统计信息； - 防范欺诈与保障安全；

You may manage cookies via your browser settings. Disabling all cookies may limit website functionality. Anonymized analytics data cannot identify you personally and is used solely to improve services.	- 个性化内容与广告（仅在另行获得您同意的前提下）。 **您可通**过浏览器设置管理 Cookie。**禁用所有 Cookie 可能限制网站功能。匿名分析数据无法**识别您的个人身份，仅用于改善服务。