



I. Purpose

Ambrosia Holdings is committed to protecting the privacy and security of all personal and sensitive data entrusted to us. This policy outlines our approach to data protection and ensures compliance with the General Data Protection Regulation (GDPR), Hong Kong's Personal Data (Privacy) Ordinance (PDPO), and other relevant legal frameworks.

II. Scope

This policy applies to all Ambrosia Holdings employees, contractors, suppliers, partners, and stakeholders who process personal data on behalf of the company. It governs all forms of data processing, including collection, storage, use, and disposal of personal information.

III. Core Principles

Ambrosia Holdings adheres to the following principles when processing personal data:

1. **Lawfulness, Fairness, and Transparency**
 - Data shall be processed lawfully, fairly, and in a transparent manner.
 - Individuals will be informed about how their data is collected, used, and shared.
2. **Purpose Limitation**
 - Data shall be collected for specified, explicit, and legitimate purposes and not further processed in ways incompatible with those purposes.
3. **Data Minimisation**
 - Only data necessary for the intended purpose shall be collected and processed.
4. **Accuracy**
 - Personal data shall be accurate and kept up to date.
 - Inaccurate data will be corrected or deleted promptly.
5. **Storage Limitation**
 - Data shall be retained only as long as necessary for its intended purpose and in compliance with legal retention requirements.
6. **Integrity and Confidentiality**
 - Appropriate security measures shall be implemented to protect data against unauthorized access, alteration, loss, or destruction.
7. **Accountability**
 - Ambrosia Holdings shall demonstrate compliance with data protection laws and this policy.

IV. Legal Basis for Data Processing

Personal data will only be processed when one of the following legal bases applies:

1. Consent has been obtained from the data subject.
2. Processing is necessary for the performance of a contract.
3. Compliance with a legal obligation.

4. Legitimate interests pursued by the company, provided these do not override individual rights.

V. Data Subject Rights

Ambrosia Holdings recognizes and respects the rights of individuals under data protection laws, including:

1. The right to access their personal data.
2. The right to rectification of inaccurate data.
3. The right to erasure ("right to be forgotten").
4. The right to restrict processing.
5. The right to data portability.
6. The right to object to processing.
7. The right not to be subject to automated decision-making and profiling.

VI. Data Security

1. Technical and Organisational Measures

- Implement robust cybersecurity protocols, including encryption, access controls, and secure storage solutions.
- Regularly test and update security systems to protect against evolving threats.

2. Incident Response

- Establish procedures to detect, report, and respond to data breaches promptly.
- Notify affected individuals and relevant authorities within legally mandated timeframes in case of a data breach.

VII. Data Sharing and Transfers

1. Internal and External Sharing

- Personal data shall only be shared with authorized personnel or third parties who demonstrate compliance with data protection laws.

2. International Transfers

- Data transfers outside Hong Kong or the EU will comply with applicable laws, including GDPR's provisions on data transfers to third countries.

VIII. Training and Awareness

1. All employees handling personal data will receive regular training on data protection laws and best practices.
2. Stakeholders, including suppliers and partners, will be required to align with Ambrosia's data protection standards.

IX. Governance and Accountability

1. Data Protection Officer (DPO)

- A DPO shall oversee data protection compliance, report directly to senior management, and act as the primary point of contact for data protection issues.
- 2. **Audits and Monitoring**
 - Regular audits shall be conducted to assess compliance with this policy and legal requirements.

X. Non-Compliance and Corrective Actions

1. **Reporting Violations**
 - Employees and stakeholders are encouraged to report data protection concerns via established reporting channels.
 - Whistleblower protections are in place to ensure transparency.
2. **Corrective Actions**
 - Non-compliance will be addressed through appropriate disciplinary measures, contractual enforcement, or legal action as required.

XI. Review and Updates

This policy will be reviewed annually or when there are significant changes in legal requirements, business practices, or risks related to data protection. Updates will be communicated promptly to all relevant parties.

XII. Conclusion

Ambrosia Holdings is dedicated to maintaining the highest standards of data protection and privacy. By adhering to this policy, we aim to build trust, ensure legal compliance, and foster a culture of responsibility in data handling.

Ambrosia Holdings

Administration