



WEBSITE PRIVACY POLICY

Ebor International Limited trading as Ebor Trading

Sourcing | Procurement | Supplier Due Diligence | Trade Coordination

Protecting personal and commercial information with care, transparency and appropriate control

PUBLIC WEBSITE POLICY

This policy explains how Ebor International Limited, trading as Ebor Trading, collects, uses, shares, retains and protects personal information through the Ebor Trading website and website-linked business enquiries.

About this document

This public policy applies to visits to the Ebor Trading website, its enquiry form, website-linked email correspondence and the initial assessment of sourcing, procurement, supplier-review, product-development and trade-coordination enquiries. It should be read with any short notice displayed where information is collected and any transaction-specific notice supplied if an enquiry develops into a commercial relationship.

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1. Who we are

Ebor Trading is the trading name used by Ebor International Limited for international sourcing, procurement, supplier-review and trade-coordination activities. Ebor International Limited is a Hong Kong company registered under Business Registration Number 64960969, with its registered office at Room 912, 9/F, Lippo Sun Plaza, No. 28 Canton Road, Tsim Sha Tsui, Hong Kong.

Ebor Trading is not a separate legal entity. In this policy, 'Ebor Trading', 'we', 'our' and 'us' mean Ebor International Limited.

For personal information collected through the website, Ebor International Limited is normally the data user under Hong Kong law and, where another data-protection law applies, the controller unless a more specific notice states otherwise. The Privacy Lead can be contacted using the details in section 21.

2. Scope and status

This policy covers public pages, online forms, website-linked email, server and security logs, any approved meeting or communication facility, and correspondence arising from a website enquiry. It also covers proportionate checks carried out to assess a proposed client, supplier, product, route or commercial opportunity.

This policy does not replace a contract, non-disclosure agreement, supplier term, purchase order, engagement letter or transaction-specific privacy notice. A more specific notice supplements this policy and prevails for the processing activity it expressly addresses.

3. Applicable privacy framework

Our primary framework is the Personal Data (Privacy) Ordinance (Cap. 486) of Hong Kong (PDPO), including the six Data Protection Principles and the statutory direct-marketing requirements.

Where the territorial scope of United Kingdom law is engaged, we also apply the UK General Data Protection Regulation, the Data Protection Act 2018, the Privacy and Electronic Communications Regulations 2003 as amended, and relevant amendments made by the Data (Use and Access) Act 2025. Another mandatory local law may apply to a particular person or transaction.

This policy describes our general practice. It does not create a contractual right beyond a right provided by applicable law or a separate written agreement.

4. Personal information we collect

- Identity and contact details: name, title, organisation, role, business address, email address, telephone number, country or territory, and preferred language.
- Authority and business details: organisation represented, authority to act, sector, website, commercial background and relevant professional information.
- Enquiry and product details: requested service, intended use, specifications, drawings, photographs, samples, quantity, packaging, target market, budget, delivery destination and timing.
- Supplier and due-diligence details: supplier or factory identity, ownership and authority information, quotations, communications, certificates, manufacturing capability, quality information, delivery history, sanctions or restricted-goods checks, product-safety information, origin and customs information.
- Commercial and transaction details: quotation, project, order and contract references; correspondence; payment status; invoices; and transaction records when an enquiry progresses.
- Communications and preferences: form submissions, emails, call or meeting notes, feedback, event or newsletter choices, consent, objections and unsubscribe records.
- Technical and security information: Internet Protocol address, browser and device data, operating system, approximate network-derived location, referring page, page requests, timestamps, server and security logs, and any permitted cookie or preference identifier.

- Information voluntarily supplied in documents, images, catalogues, quotations, certificates or other attachments.

Please do not send unnecessary sensitive information. Do not send identity-document copies, payment-card data, passwords, confidential formulae, complete undisclosed supplier lists, unreleased designs, health information or criminal-record information through the public form or ordinary email unless we have requested it through an approved secure route.

5. Website contact form collection notice

The current website contact form asks for name and surname, email address and an enquiry. Those fields are required so that we can identify, understand and respond to the enquiry. A telephone number is optional. If required information is not supplied, the form may not be accepted and we may be unable to respond.

We use form information to deliver and secure the form, acknowledge and respond to the enquiry, assess commercial suitability, keep a proportionate record, prevent misuse and take requested steps towards a possible business relationship. It may be disclosed to authorised personnel, relevant suppliers or service providers, professional advisers and public authorities as described in section 9.

Submitting an enquiry does not enrol the sender in marketing. Any optional direct-marketing choice must be separate and will not affect our handling of the enquiry.

6. How we obtain information

We obtain information directly when a person completes the form, sends email, provides a document, requests a meeting or communicates through an approved business channel. We may also receive relevant information from the person's employer, colleague, client, supplier, manufacturer, distributor, adviser, logistics provider or another authorised representative.

For proportionate due diligence, we may use public company registers, sanctions and watchlist sources, product-safety databases, certification bodies, trade and customs sources, supplier websites, professional databases, search engines, testing or inspection providers and other lawful sources. Technical information is generated by the web server and security systems. The Cookie Policy records the current website technology position.

7. Purposes and legal grounds

Under the PDPO, personal data is used for the purpose notified when it is collected, a directly related purpose, or another purpose permitted by law or supported by prescribed consent. Where UK law applies, the principal Article 6 grounds are steps requested before a contract, performance of a contract, legal obligation, legitimate interests and consent where required.

Purpose	Typical information	Principal ground or justification
Respond to enquiries	Identity, contact, organisation and enquiry details	Requested pre-contract steps; legitimate interests; notified purpose
Assess commercial suitability	Product, supplier, budget, market, authority and timing information	Requested pre-contract steps; legitimate interests in evaluating opportunity and risk
Conduct supplier, product and compliance checks	Corporate, certification, sanctions, safety, origin and adverse-information records	Legitimate interests; legal obligations; legal claims; notified purpose
Provide an agreed service	Project, specification, communication, order, invoice and payment information	Contract performance; legal obligations; legitimate interests
Operate and secure the website	Form, request, device, network, log and security information	Legitimate interests; legal obligations; consent or a statutory exception for device technologies where required
Maintain governance and legal records	Contracts, accounts, due diligence, correspondence and rights requests	Legal obligations; contract; legitimate interests in audit, governance and legal claims
Send permitted business marketing	Business contact, service interest, consent and preference information	PDPO Part 6A consent or indication of no objection; PECR consent or permitted business-contact rule where applicable
Improve services and reporting	Feedback, enquiry trends and appropriately minimised usage information	Legitimate interests; consent where required; anonymisation or aggregation where practicable

Where we rely on legitimate interests, we consider necessity, proportionality, reasonable expectations and the effect on the individual. We do not rely on legitimate interests where the individual's rights and interests override the business purpose.

8. Supplier, product and compliance due diligence

A review may include identity, authority, corporate status, capability, certification, product safety, quality, sanctions, restricted-goods, anti-bribery, customs, origin, intellectual-property, ethical-sourcing, insurance and adverse-information checks. We seek to distinguish verified evidence from statements, assumptions and open-source information.

Due-diligence records support internal and client decisions; they are not public ratings or guarantees. We may invite clarification or correction where appropriate. A limited record of a prohibited, fraudulent or materially high-risk enquiry may be retained where necessary for sanctions, fraud, product-safety, intellectual-property or legal-risk controls.

9. Who receives personal information

We do not sell personal information and do not provide it to another organisation for that organisation's independent direct marketing. Where necessary, proportionate and lawful, recipients may include:

- directors, employees, consultants and authorised personnel of Ebor International Limited who need the information for enquiry handling, service delivery, finance, security or compliance;
- the client, buyer, supplier, manufacturer, distributor or product owner directly involved in the opportunity;

- testing, inspection, certification, quality-control, packaging, warehousing, freight, courier, customs and logistics providers;
- hosting, cloud, security, communications, customer-management, translation, meeting, document-storage and administrative providers acting under appropriate terms;
- banks, payment providers, insurers, auditors, accountants, solicitors and other professional advisers;
- regulators, customs bodies, tax authorities, courts, law-enforcement agencies or other public bodies where disclosure is required or permitted by law; and
- a genuine purchaser, investor, lender or successor in a proposed corporate transaction, subject to appropriate confidentiality and privacy controls.

Processors acting for us are required by contractual or other controls to use personal information only for authorised purposes, protect it, limit access, support rights requests and delete or return it when required.

10. International access and transfers

Ebor Trading operates from Hong Kong and supports cross-border trade. Information may be accessed, processed or stored in Hong Kong, mainland China, the United Kingdom and other countries involved in the relevant client, supplier, technology, professional or logistics relationship.

We assess purpose, necessity, sensitivity, recipient, destination and security before a cross-border disclosure. Measures may include minimisation, redaction, access controls, encryption in transit, confidentiality terms, supplier due diligence and the Privacy Commissioner's recommended model contractual clauses for transfers controlled from Hong Kong.

Where UK restricted-transfer rules apply, we use an applicable adequacy regulation, the UK International Data Transfer Agreement, the UK Addendum to approved contractual clauses, another recognised safeguard or a lawful exception, with a transfer-risk assessment where required. A person may ask for information about an applicable safeguard by contacting the Privacy Lead; commercially sensitive provisions may be redacted.

11. Direct marketing and business communications

We send marketing about Ebor Trading services, events or relevant business opportunities only where permitted. Where Hong Kong Part 6A applies, we provide the prescribed information and obtain an informed, express indication of consent or no objection before using personal data for direct marketing. Silence is not consent. We do not transfer personal data to a third party for that party's marketing without the separate written consent required by law.

Where UK electronic-marketing rules apply, we use consent or the relevant rule for corporate subscribers and business contacts. Every marketing message identifies the sender and provides a working, no-charge method of objection or unsubscribe.

Your direct-marketing right You may object or unsubscribe at any time, without charge, by using the link in a message or emailing office@ebortrading.com. We will stop marketing and may keep only the minimum suppression record needed to respect the choice. Necessary project, contractual, security and legal communications will continue.

12. Artificial intelligence and automated tools

Approved artificial-intelligence-assisted or automated tools may support translation, drafting, document classification, research, comparison, workflow management and quality assurance. The legal ground is the same as for the underlying business task; use of a tool is not a separate purpose.

We apply human oversight to material commercial, supplier and compliance decisions. We do not intentionally upload unnecessary identity documents, banking data, trade secrets, confidential supplier records or sensitive personal information to public or unapproved AI services. We do not permit personal information supplied through the website to be used to train a provider's general-purpose model unless the information has been effectively anonymised or a separate lawful and transparent arrangement applies.

We do not currently make solely automated decisions about website users that produce legal or similarly significant effects. If that changes, we will provide the information and safeguards required by applicable law before the processing begins.

13. Cookies and similar technologies

The current public website does not intentionally set non-essential analytics, advertising or social-media tracking cookies during ordinary page viewing. Server logs and the security token embedded in the enquiry form are not browser cookies. The Website Cookie Policy records the technology review completed on 18 July 2026 and lists cookies used only in the restricted WordPress administration area.

If a non-essential storage or access technology is introduced, it will not be activated until the required consent has been obtained or a lawful exception has been correctly implemented with the required information and objection control.

14. Security and data incidents

We use proportionate technical and organisational controls designed to protect personal information against unauthorised or accidental access, processing, alteration, disclosure, loss, erasure or use. Controls may include role-based access, multifactor authentication, encryption in transit, secure cloud services, logging, confidentiality duties, supplier checks, malware protection, backups, retention controls and incident procedures.

No website, email or storage system can be guaranteed completely secure. A suspected incident is assessed, contained, recorded and remedied promptly. We notify the Hong Kong Privacy Commissioner, affected people, the UK Information Commissioner or another competent authority where notification is required by applicable law or is appropriate to reduce a material risk of harm.

15. Retention and deletion

We keep personal information only for as long as reasonably required for the notified purpose, service delivery, risk management, legal claims and applicable company, tax, accounting, customs and contractual obligations. The following are standard maximum approaches, subject to a justified legal hold or shorter operational need:

Record category	Standard retention approach
General website enquiry that does not progress	Up to 24 months after the last meaningful contact
Quotation, supplier review or project enquiry	For the active relationship and normally up to 7 years after completion or last material activity
Supplier due diligence and compliance	Normally up to 7 years after the relevant decision, relationship or last review; longer only where justified for sanctions, safety, intellectual property or claims
Contracts, orders, invoices and transaction records	Normally 7 years after completion or the relevant accounting period, or longer where law requires
Marketing consent and suppression	Consent evidence while relied upon; a minimum suppression record for as long as needed to honour the objection
Website and security logs	Normally up to 12 months; longer only for an incident, investigation or legal claim
Rights requests and complaint records	For the period required to handle and evidence the response, including any statutory refusal-log requirement
Prohibited, fraudulent or materially high-risk enquiry	A limited record for up to 7 years where necessary and proportionate for fraud, sanctions, safety, intellectual-property or legal-risk controls

When information is no longer required, we take reasonable steps to delete, anonymise or securely destroy it, subject to backup cycles and legal holds.

16. Your privacy rights

Under Hong Kong law, a person may request access to personal data held about them and correction of inaccurate data, subject to statutory conditions and exemptions. A valid data access request may be made using the Privacy Commissioner's Data Access Request Form and is ordinarily handled within 40 days. We record any refusal as required by law.

Where UK data-protection law applies, rights may include access, rectification, erasure, restriction, objection, data portability, withdrawal of consent and safeguards concerning qualifying automated decisions. These rights are not absolute and depend on the processing ground and applicable exemptions. A UK rights request is normally answered without undue delay and within one month, subject to any lawful extension.

A request may be sent to office@ebortrading.com. It should identify the person, the information or right concerned and any relevant dates or context. We may request proportionate evidence of identity and authority. A fee is charged only where law permits it.

17. Complaints

Please first send a privacy concern to office@ebortrading.com so that we can investigate and respond fairly and without undue delay.

A person may also complain to the Office of the Privacy Commissioner for Personal Data in Hong Kong (www.pcpd.org.hk). Where UK data-protection law applies, a person may complain to the Information Commissioner's Office (www.ico.org.uk). Contacting us first does not remove the right to approach a regulator.

18. Children

The website is intended for business and professional enquiries and is not directed to children. We do not knowingly seek personal information from a person under 18 through the public form. If we learn that a child has submitted information without appropriate authority, we will restrict and delete it unless retention is required to protect the child or comply with law.

19. External websites

The website may link to an independent supplier, regulator, professional platform, map, video service, meeting tool or social-media page. When that organisation determines its own purposes and means, its privacy practices are outside our control. Users should review its privacy information before providing information or activating the service.

20. Changes to this policy

We may update this policy for a change in law, guidance, website technology, provider, service or processing activity. The current version and effective date will be published on the website. If a change materially affects how existing personal information is used, we will provide additional notice or obtain consent where required before the new use begins.

21. Contacting Ebor Trading

Questions, requests or complaints should be sent to office@ebortrading.com. Postal correspondence should be addressed to the Privacy Lead, Ebor International Limited trading as Ebor Trading, Room 912, 9/F, Lippo Sun Plaza, No. 28 Canton Road, Tsim Sha Tsui, Hong Kong.

22. Website form notice for publication

The following short notice is approved text for display immediately below or beside the Ebor Trading contact form. It forms part of the website's point-of-collection information:

Privacy notice Ebor International Limited, trading as Ebor Trading, uses your required name, email address and enquiry to respond, assess the opportunity, secure the form and keep a proportionate business record. A telephone number is optional. If required fields are not completed, we cannot receive or answer the enquiry. We may share information with authorised personnel, relevant suppliers and service providers, professional advisers and authorities where necessary and lawful, including across borders as explained in our Privacy Policy. Submitting this form does not subscribe you to marketing. You may request access or correction and contact our Privacy Lead at office@ebortrading.com. Read the full Website Privacy Policy.

Policy information and document control

The following information forms the formal document-control record for this public website document.

Control	Information
Document title	Website Privacy Policy
Legal entity	Ebor International Limited
Trading name	Ebor Trading
Website	https://ebortrading.com
Business Registration Number	64960969
Registered office	Room 912, 9/F, Lippo Sun Plaza, No. 28 Canton Road, Tsim Sha Tsui, Hong Kong
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Version	14.0
Status	Approved for website publication
Classification	Public
Policy owner	Board of Directors, Ebor International Limited
Operational responsibility	Privacy Lead
Approval date	18 July 2026
Effective date	18 July 2026
Review date	18 July 2027, or earlier after a material legal, regulatory, technological or operational change
Contact	office@ebortrading.com
Related documents	Website Cookie Policy; Website Terms and Conditions; form-level collection notice; applicable commercial agreements
Supersedes	Ebor Trading Website Privacy Policy Version 13.0 dated 16 July 2026

Revision record

Version	Date	Status	Summary
13.0	16 July 2026	Superseded	First consolidated Ebor Trading website edition.
14.0	18 July 2026	Current	Expert-reviewed publication edition aligned to the current website form and technology, with strengthened collection notice, legal grounds, marketing, transfers, AI, retention, rights and incident wording.

Approved for publication by Ebor International Limited

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