

Privacy Policy

This Privacy Policy describes how SMX Operations Limited (“Company”, “we”, “us”, “our”) collects, uses, discloses and protects Personal Data when you use our website and web application at <https://www.sendico.io/> and any related interfaces (the “Platform” or “Website”).

We process Personal Data in accordance with the Personal Data (Privacy) Ordinance (Cap. 486) of Hong Kong and the Data Protection Principles set out in its Schedule 1 (together, the “PDPO”).

By using the Platform, you agree to the collection and use of information in accordance with this Privacy Policy.

1. Interpretation and Definitions

1.1. Interpretation

Capitalised terms have the meanings given in this section. The same meaning applies whether they appear in singular or plural.

1.2. Definitions

Account – a unique account created for you to access the Platform or parts of it.

Company / We / Us / Our – SMX Operations Limited, a company incorporated in Hong Kong with its registered office at Room 607, 12/F., Block C, Hong Kong Industrial Centre, 489-491 Castle Peak Road, Lai Chi Kok, HongKong.

Platform / Website – <https://www.sendico.io/> and any related subdomains or interfaces through which we provide the Service.

Service – access to and use of the Platform and related functionality we provide.

Device – any device that can access the Platform (e.g. computer, mobile phone, tablet).

Cookies – small text files stored on your Device by a website, containing information about your browsing.

Personal Data – any data relating directly or indirectly to a living individual, from which it is practicable for the identity of the individual to be ascertained and in a form in which access to or processing of the data is practicable, as defined under the PDPO.

Data User – a person who, alone or jointly with others, controls the collection, holding, processing or use of Personal Data (for this Policy, the Company acts as a “data user”).

Data Processor / Service Provider – any person or entity (including third-party companies or individuals) that processes Personal Data on behalf of the Company and not for their own purposes.

Data Subject / You – the individual whose Personal Data is collected, held or processed by us, including contractors using the Platform and representatives of our clients.

2. Types of Data We Collect

We collect Personal Data directly from you, automatically from your Device, and from third-party sources, in accordance with the PDPO's data protection principles regarding purpose and manner of collection.

2.1. Data You Provide To Us

- Contact and Personal Information
- First and last name
- Country and address
- Email address, phone number, messenger accounts
- Password and registration date on the Platform
- Communications you send or receive via the Platform
- Pictures, images, audio (including your voice and voices of others), and video you upload or generate when using the Platform
- Identification Information
- Proof of identity (e.g. passport, ID card)
- Proof of address
- Facial images as part of identity verification (where applicable)
- Financial Information
- Payment card details (processed by payment providers where applicable)
- Tax or VAT numbers (if applicable)
- Bank account details
- E-wallet or other payment account information
- Business Information
- Company name and details
- Role, job title and hierarchy/relationship (e.g. contractor, representative of a client)
- Business contact details
- Information about your business needs and how you intend to use the Platform

If you fail to provide Personal Data that we reasonably require to perform a contract with you or to provide access to the Platform, we may be unable to provide some or all Services and may have to suspend or terminate your Account.

2.2. Data We Collect Automatically

When you access or use the Platform, we may automatically collect:

- Cookies and Similar Technologies

- Information stored in Cookies and similar tracking technologies (e.g. to maintain sessions, remember preferences and analyse usage).
- You can control Cookies through your browser settings; however, disabling Cookies may affect some Platform functions.
- Device and Technical Data
- IP address
- Device type, operating system and version
- Browser type and version
- Language settings
- Mobile network information and carrier
- Device identifiers (e.g. advertising ID where applicable)
- Usage and Activity Data
- Pages visited and time spent on the Platform
- Clicks and interactions with UI elements
- Access times and referring pages
- Error logs and performance data
- Location Data
- Non-precise location derived from your IP address (country, city, region or approximate area), not GPS coordinates.

2.3. Data From Third-Party Sources

We may receive Personal Data about you from:

- Analytics providers (e.g. aggregated usage data)
- Payment service providers (e.g. confirmation of payments)
- KYC/AML service providers (e.g. results of identity verification and screening)
- Business partners and publicly available sources (e.g. business contact details, company information)
- We may combine such data with data we collect directly from you to maintain accurate records, prevent fraud and improve the Platform.

2.4. Special Categories and Sensitive Data

We generally do not intentionally collect sensitive data such as information on race, religion, health, political opinions or criminal records. The main exception is facial images used for identity verification (where applicable). Where required by law, we will obtain your clear consent before collecting such information and will limit use and retention to what is strictly necessary.

3. How We Use Your Personal Data

We use your Personal Data only for purposes that are directly related to our functions and activities and are not excessive in relation to those purposes.

3.1. Provision and Operation of the Platform

We use Contact, Personal, Financial, Business and Usage Data to:

- Provide, operate and maintain the Platform
- Manage your Account and authentication
- Enable you to use Platform functions
- Process payments and fulfil contractual obligations
- Monitor and improve performance, functionality and user experience

3.2. Identity Verification, Security and Fraud Prevention

We use Identification Information (including facial images where applicable), Contact Information, Financial Information and Device/Usage Data to:

- Verify your identity and eligibility to use the Platform
- Comply with our anti-fraud, security and compliance procedures
- Detect and prevent abuse, suspicious behaviour, unauthorised access or other unlawful activities
- Enforce our terms and protect our rights and those of our users

3.3. Communications

We use your Contact and Business Information to:

- Send service-related communications (e.g. account notices, security alerts, operational updates)
- Respond to your questions and support requests
- Manage and document our communications with you
- These communications are necessary for the operation of the Platform and are not direct marketing.

3.4. Direct Marketing

If you consent, we may use your Contact Information and Business Information to send you information about:

- Updates and new features of the Platform
- Events, news, promotions and offers related to our services
- Where required by the PDPO's direct marketing provisions, we will:
- Inform you of the intended use of your Personal Data for direct marketing and the types of marketing communications;

- Obtain your prescribed consent (which may include an indication of no objection) before using your data for direct marketing or transferring it to another party for direct marketing; and
- Provide you with a clear and simple way to opt out at any time.
- If you opt out, we will stop using your Personal Data for direct marketing while still sending essential service communications.

3.5. Requests, Disputes and Legal Obligations

We may use any relevant Personal Data to:

- Handle and record your requests, complaints or queries
- Prevent, detect and investigate security incidents and abuse
- Comply with legal obligations, court orders, regulatory requirements or requests from competent authorities
- Establish, exercise or defend legal claims, including in connection with audits, investigations or disputes

3.6. Analytics and Service Improvement

We may use anonymised or aggregated data (or Personal Data, where allowed by law) to:

- Analyse usage of the Platform and identify trends
- Improve functions, security and performance
- Develop new features, products or services
- Conduct internal reporting and statistics
- Where possible, we anonymise or aggregate Personal Data so that it no longer identifies you.

3.7. Business Transfers

We may use Personal Data in connection with:

- A merger, acquisition, restructuring or sale of all or part of our assets
- Due diligence and transaction-related processes

If control of the Company or Platform changes, your Personal Data may be transferred to the new operator, who will continue to use it in accordance with this Policy or a privacy policy providing at least a comparable level of protection.

4. Disclosure and Sharing of Personal Data

We will not sell your Personal Data. We may share your Personal Data in the following situations:

4.1. Service Providers and Data Processors

We may share Personal Data with third-party Service Providers that process data on our behalf, for example:

- Cloud hosting and infrastructure providers
- Payment processors and banks
- Analytics and monitoring providers
- Identity verification and KYC/AML providers
- IT, security, audit, legal and accounting advisers

These parties may only process Personal Data on our instructions and must implement appropriate security measures. We contractually require them to protect Personal Data consistently with the PDPO and this Policy.

4.2. Affiliates and Group Companies

We may share Personal Data with our affiliates and group companies, where necessary for:

- Operating and supporting the Platform
- Internal administration and reporting
- Managing group-level services and infrastructure

Where such entities are outside Hong Kong, we will adopt appropriate safeguards as described in section 5.

4.3. Business Partners and Clients

If you are a contractor, some of your Personal Data (e.g. name, role, profile information and relevant work outputs) may be shared with our clients when this is required to operate the Platform and fulfil contractual arrangements.

We may also share limited Personal Data with selected business partners to provide or integrate specific functions and services, where this is necessary and lawful.

4.4. Business Transfers

If we are involved in a merger, acquisition, restructuring, asset sale or similar transaction, Personal Data may be disclosed to potential or actual counterparties, advisers and their representatives, subject to confidentiality obligations, and may be transferred as part of the transaction.

4.5. Legal and Regulatory Disclosure

We may disclose Personal Data where we reasonably believe it is necessary to:

- Comply with applicable laws, regulations, court orders or requests from competent authorities
- Assist law enforcement, regulators or other authorities in preventing or investigating crime, fraud or security incidents
- Protect the rights, property or safety of the Company, our users or the public

- Enforce our contracts, policies and terms of use, or to manage disputes and claims

5. Cross-Border Transfers of Personal Data

Your Personal Data may be stored and processed in locations outside Hong Kong, including where:

- Our servers, cloud infrastructure or Service Providers are located; or
- Our affiliates and business partners operate.

When we transfer Personal Data outside Hong Kong, we will:

- Take reasonably practicable steps to ensure that the recipient offers a level of protection of Personal Data that is comparable to that under the PDPO; and
- Use contractual or other safeguards where appropriate, following applicable guidance of the Hong Kong Privacy Commissioner for Personal Data.

By using the Platform, you understand that your Personal Data may be transferred and processed in jurisdictions that may have different data protection laws from Hong Kong, but we will treat your Personal Data in accordance with this Privacy Policy at all times.

6. Retention of Personal Data

We take reasonably practicable steps to ensure that Personal Data is:

- Accurate, having regard to the purposes for which it is to be used; and
- Not kept longer than necessary for the fulfilment of the purposes for which it is collected and used.

In practice:

- We retain Personal Data for as long as your Account is active or as needed to provide you with access to the Platform and to fulfil our contractual obligations.
- We may retain Personal Data for an additional period where necessary to comply with legal obligations, to resolve disputes, to enforce our rights, or to maintain accurate business records.
- Audio and video recordings used for quality control or training (if applicable) are typically retained for up to 18 months, unless a longer period is required for legal, security or dispute-related reasons.

Once retention periods expire, we will:

- Erase Personal Data; or
- Anonymise it so that it no longer identifies you (in which case we may use it for analytics, research or service improvement).

7. Security of Personal Data

We take reasonably practicable steps to protect Personal Data against unauthorised or accidental access, processing, erasure, loss or use, including where appropriate:

- Restricted access to Personal Data on a need-to-know basis
- Password protection, access controls and authentication
- Technical security (e.g. firewalls, encryption in transit where appropriate, system monitoring)
- Organisational and administrative controls (e.g. staff training, internal policies)

However, no method of transmission over the Internet or method of electronic storage is completely secure. You are responsible for:

- Keeping your Account credentials confidential
- Using secure networks and up-to-date software
- Informing us promptly if you suspect any unauthorised access to your Account

To the maximum extent permitted by law, we are not liable for unauthorised access that is beyond our reasonably practicable control.

8. Your Rights Under Hong Kong Law

Under the PDPO, you generally have the following rights in relation to your Personal Data:

8.1. Right of Access

You may request confirmation of whether we hold Personal Data about you and, if so, request:

A copy of such Personal Data; and

Information about how we have used or are using that Personal Data.

We may charge a reasonable fee to cover the direct costs of processing a data access request, as permitted by law.

8.2. Right of Correction

You may request that we correct Personal Data about you that is inaccurate, incomplete or misleading, having regard to the purposes for which it is used.

8.3. Direct Marketing – Right to Opt Out

Where we use your Personal Data for direct marketing under the PDPO, you may at any time:

Withdraw your consent or indication of no objection; or

Request that we stop using your Personal Data for direct marketing.

We will respect your request and, where legally required, update our records within the time limits prescribed by law.

8.4. How to Exercise Your Rights

To exercise any of the rights above or to make enquiries about our data handling practices, please contact us using the details in section 11. We may need to reasonably verify your identity before processing your request.

We will handle all requests in accordance with the PDPO. In some cases, we may refuse a request where a PDPO exemption applies (for example, if disclosure would likely cause serious harm to the physical or mental health of any individual, or would prejudice certain law enforcement or security interests).

8.5. Complaints to the Regulator

You also have the right to lodge a complaint with the Office of the Privacy Commissioner for Personal Data, Hong Kong (PCPD).

9. Children's Privacy

The Platform is not directed to children under 13 years of age and we do not knowingly collect Personal Data from children under 13. If you are a parent or guardian and believe that your child has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from a child under 13 without parental consent (where required), we will take steps to delete such data as soon as reasonably practicable.

10. Third-Party Websites and Services

The Platform may contain links to third-party websites or services that are not operated or controlled by us. This Privacy Policy applies only to our Platform.

We are not responsible for the content, privacy practices or policies of any third-party websites or services. You should review the privacy policies of those third parties before providing any Personal Data to them or using their services.

11. Contact Us

If you have any questions, requests or complaints about this Privacy Policy or our handling of your Personal Data, please contact us at:

Company name: SMX Operations Limited

Registered address: Room 607, 12/F., Block C, Hong Kong Industrial Centre, 489-491 Castle Peak Road, Lai Chi Kok, HongKong

Email: compliance@smartx.consulting

This Privacy Policy and any non-contractual obligations arising out of or in connection with it are governed by the laws of Hong Kong Special Administrative Region.

12. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, technologies, legal requirements or other factors.

We will post the updated Privacy Policy on this page and update the "Last updated" date at the top.

If changes are material, we may also notify you by email or through the Platform, where appropriate.

Your continued use of the Platform after any changes take effect will constitute your acknowledgement of the updated Privacy Policy.

Last updated: 20.11.2025

Annex 1 – Cookies Policy

This Cookies Policy explains what Cookies are and how we use them on the Website.

You should read this Cookies Policy so you can understand what types of Cookies we use, what information we collect using Cookies and how that information is used.

Cookies do not typically contain information that directly identifies you, but Personal Data that we store about you may be linked to the information stored in and obtained from Cookies. For further information on how we use, store and keep your Personal Data secure, see our Privacy Policy above.

We do not store sensitive Personal Data, such as mailing addresses or account passwords, in the Cookies that we use.

1. Interpretation and Definitions

1.1. Interpretation

The words with an initial capital letter have meanings defined under the following conditions. The following definitions shall have the same meaning regardless of whether they appear in singular or plural.

1.2. Definitions

For the purposes of this Cookies Policy:

Company / We / Us / Our has the meaning given in the Privacy Policy and refers to SMX Operations Limited.

Cookies means small files that are placed on your computer, mobile device or any other device by a website, containing details of your browsing history on that website, among other uses.

Website refers to <https://www.sendico.io/>.

You means the individual accessing or using the Website, or a company or any legal entity on behalf of which such individual is accessing or using the Website, as applicable.

2. The Use of Cookies

2.1. Types of Cookies We Use

Cookies can be “Persistent” or “Session” Cookies:

- Persistent Cookies remain on your personal computer or mobile device when you go offline;
- Session Cookies are deleted as soon as you close your web browser.

We use both session and persistent Cookies for the purposes set out below.

(a) Necessary / Essential Cookies

Type: Session Cookies

Administered by: Us

Purpose:

These Cookies are essential to provide you with services available through the Website and to enable you to use some of its features. They help to authenticate users and prevent fraudulent use of user accounts. Without these Cookies, the services that you have asked for cannot be provided, and we only use these Cookies to provide you with those services.

(b) Cookies Policy / Notice Acceptance Cookies

Type: Persistent Cookies

Administered by: Us

Purpose:

These Cookies identify if users have accepted the use of Cookies on the Website.

(c) Functionality Cookies

Type: Persistent Cookies

Administered by: Us

Purpose:

These Cookies allow us to remember choices you make when you use the Website, such as remembering your login details or language preference. The purpose of these Cookies is to provide you with a more personal experience and to avoid you having to re-enter your preferences every time you use the Website.

(d) Tracking and Performance Cookies

Type: Persistent Cookies

Administered by: Third parties

Purpose:

These Cookies are used to track information about traffic to the Website and how users use the Website. The information gathered via these Cookies may directly or indirectly identify you as an individual visitor. This is because the information collected is typically linked to a pseudonymous identifier associated with the device you use to access the Website.

We may also use these Cookies to test new advertisements, pages, features or new functionality of the Website to see how our users react to them.

3. Your Choices Regarding Cookies

If you prefer to avoid the use of Cookies on the Website, you must first disable the use of Cookies in your browser and then delete the Cookies saved in your browser associated with this Website. You may use this option to prevent the use of Cookies at any time.

If you do not accept our Cookies, you may experience some inconvenience in your use of the Website and some features may not function properly.

If you would like to delete Cookies or instruct your web browser to delete or refuse Cookies, please visit the help pages of your web browser.

Last updated: [●]