

PRIVACY POLICY

Last updated: 26 November 2025

Effective for: fms-go.com

Legal Entity: Asia Million Rapport Limited (Hong Kong)

PRIVACY POLICY

1. Introduction

This Privacy Policy (“Policy”) explains how **Asia Million Rapport Limited**, a company incorporated in Hong Kong (“Company”, “we”, “us”, “our”), collects, uses, stores, and protects personal data of individuals who use our website and digital platform (“Services”).

This Policy is an integral part of our **Terms & Conditions**.

Refund rules referenced regarding subscriptions are described in the **Refund & Cancellation Policy**.

By using the Services, you agree to this Policy.

If you do not agree, please discontinue use of the Services.

This Policy is prepared in accordance with the **Hong Kong Personal Data (Privacy) Ordinance (PDPO)**.

2. Definitions

- **Personal Data** — any data relating to an identifiable individual.
 - **Parent Account** — an adult User (18+) who manages a family account and subscription.
 - **Child Profile** — a profile created by a Parent for a child.
 - **Services** — the FMS digital platform, including digital content, tasks, and subscription access.
 - **Authorized Payment Provider** — a third-party provider handling subscription payments.
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3. Data We Collect

We collect only the data necessary to operate and improve the Services.

3.1. Data Provided by Parents

- Name
- Email
- Phone number
- Login information
- Family account settings
- Subscription information
- Payment confirmations (via our payment provider)
- Communication preferences

3.2. Data Related to Children

Parents may provide:

- name or nickname of the child,
- age or age range,
- in-platform activity (progress, completed tasks, preferences).

Children **cannot** provide payment information or manage subscriptions.

3.3. Automatically Collected Data

- IP address
- Device type
- Browser info
- Platform usage statistics
- Cookies and similar technologies
- Diagnostic and performance logs

3.4. Payment Information

We do **not** store or process bank card details.

The payment provider supplies us only with:

- payment confirmation,
- transaction metadata,
- subscription status.

4. Purpose of Data Processing

We use personal data for:

4.1. Providing and Maintaining the Services

- account creation,
- family account functionality,
- personalization,
- tracking progress.

4.2. Subscription Management

- payments and renewals,
- billing records,
- verifying payment status.

4.3. Platform Improvement

- analytics,
- debugging,
- user experience enhancement.

4.4. Communication

- service-related notifications,
- account updates,
- important policy updates.

Marketing communication is sent only with consent.

5. Legal Basis under PDPO

Processing is based on:

- User consent,
 - contractual necessity (subscription),
 - legitimate interests (security, improvement),
 - compliance with legal obligations.
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6. Children's Data and Parental Consent

6.1. Parent Control

Parents have full control over:

- creation and removal of Child Profiles,
- access to all child activity data,
- consent for all data processing.

6.2. What We Do NOT Collect from Children

We do **not** collect:

- payment information,
- direct contact details,
- login credentials,
- personally identifying information beyond what the Parent provides.

6.3. No Sharing of Children's Data

Children's data is used only:

- to provide platform functionality,
- to personalize content,
- for internal analytics.

It is **never** shared with advertisers or third parties for marketing.

7. Data Sharing

We may share data only with:

7.1. Service Providers

- hosting infrastructure,
- payment processors,
- analytics tools,
- communication tools.

These parties act strictly as **Data Processors**.

7.2. Legal Authorities

Only when required by law or a valid legal request.

7.3. No Sale of Data

We never sell or trade personal data.

8. International Data Transfers

Data may be stored or processed in:

- Hong Kong,
- Singapore,
- the EU,
- the United States,
- or other countries where our service providers operate.

We ensure adequate data protection standards through contractual safeguards.

9. Data Retention

We retain data only as long as necessary.

- Account data — while the account is active
- Child Profiles — until removed by the Parent
- Subscription records — as required by law (typically up to 7 years)
- Technical logs — 12–24 months
- Communication logs — 12 months

Users may request deletion at any time.

10. Data Security

We apply industry-standard protections:

- encrypted transmission (HTTPS),
- restricted internal access,
- secure storage,
- continuous monitoring.

No method is 100% secure, but we comply with PDPO requirements.

11. User Rights

Under PDPO, you may request:

- access to your personal data,
- correction of inaccurate data,
- deletion of data no longer needed,
- withdrawal of consent,
- opt-out of non-essential communications.

To exercise rights, contact: **df@fms-go.com**

12. Cookies

We use cookies for:

- session management,
- analytics,
- performance,
- security.

Users may disable cookies, but functionality may be limited.

13. Third-Party Links

External websites are not covered by this Policy.
We are not responsible for their privacy practices.

14. Changes to the Policy

We may update this Policy at any time.
Updates become effective upon posting.
Continued use of the Services means acceptance of the revised Policy.

15. Contact Information

Asia Million Rapport Limited
Hong Kong SAR
Email: df@fms-go.com