

Website Privacy Policy

Updated and effective as of 20 January 2026

1. TOPICS

This Privacy Policy is divided into the following sections:

[About Us](#)

[Contacting Us](#)

[Personal information we collect](#)

[What we do with your personal information](#)

[Disclosure of your personal information to third parties](#)

[International transfers](#)

[Security of your personal information](#)

[How long we keep your personal information](#)

[Your rights](#)

[Exercising your rights](#)

[Cookies and other tracking technologies](#)

[Links](#)

[Complaints](#)

[Changes to our Privacy Policy](#)

2. ABOUT US

At Ivanyan & Co (“Ivanyan & Co”, “we” or “us”), we are committed to respecting your privacy. This Privacy Policy explains how we collect, use and disclose personal information that we receive when you visit and use this website (the “Site”), communicate with us, or otherwise interact with us, whether online or offline.

It is important that you read this Privacy Policy so that you are fully aware of how and why we are using your data.

The Site is owned and operated by Ivanyan & Co, a registered foreign law firm holding a Certificate of Registration issued by the Law Society of Hong Kong since September 2025, having its address at R.702 China Building 29 Queen’s Road Central Hong Kong.

3. CONTACTING US

If you have any questions about our Privacy Policy or your information, or wish to exercise any of your rights as described in this Privacy Policy or under data protection laws, you can contact us by email: privacy@ivanyanco.hk.

4. PERSONAL INFORMATION WE COLLECT

Personal information means any information relating to an individual which can be used to identify that individual, whether directly or indirectly. It does not include data where identifiers have been removed such that it is no longer possible to relate that information to an individual (which is referred to as anonymous data).

5. INFORMATION YOU GIVE US

You may choose to provide us with personal information when:

- you use our Site;
- you are introduced to us;
- we meet you in person; or
- we are in contact by phone, email or otherwise.

The categories of personal information you provide include:

- **Identity Data**, such as first name, maiden name, last name, username or similar identifier, title, date of birth and gender;
- **Contact Data**, such as email address, phone number and delivery and billing address;
- **Employment Information**, such as name of employer and job title; and
- **Marketing and Communications Data**, such as your preferences in receiving marketing information from us and our third parties and your communication preferences.

We will indicate to you where the provision of certain personal information is required in order for us to provide certain services. If you choose not to provide such personal information, we may not be able to provide the services you have requested.

6. INFORMATION WE PROCESS AUTOMATICALLY

We also collect, store and use information about your use of the Site, and about your computer, tablet, mobile or other device through which you access the Site.

This includes the following information:

- **Technical Data**: including Internet protocol (IP) address, browser type, internet service provider, device identifier, your login information, time zone setting, browser plug-in types and versions, preferred language, activities, operating system and platform, and geographical location; and
- **Usage Data**: including the full Uniform Resource Locators (URL), clickstream to, through and from the Site, pages you viewed and searched for, page response times, length of visits to certain pages, referral source/exit pages, page interaction information (such as scrolling, clicks and mouseovers), date and time pages are accessed, website navigation and search terms used,
(referred to together in this Privacy Policy as “**Technical and Usage Data**”).

7. INFORMATION WE COLLECT FROM THIRD PARTIES

We may obtain personal information about you from the following third parties:

- publicly accessible sources, to the extent permitted by law (such as Companies House, websites associated with your company, LinkedIn etc.);
- client due diligence providers; and
- other third parties, such as other professionals you have engaged.

8. AGGREGATED DATA

We may also collect, use and share “**Aggregated Data**” such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal information but is anonymised and is not considered personal information as it will **not** directly or indirectly reveal your identity.

9. CHILDREN

The Site is not intended for or directed at children under the age of 18 years and we do not knowingly collect information relating to children under this age.

10. WHAT WE DO WITH YOUR PERSONAL INFORMATION

As a data controller, we will only use your personal information if we have a legal basis for doing so. The purpose for which we use and process your information and the legal basis on which we carry out each type of processing is explained in the table below.

Types of data	Purposes for which we will process the information	Legal Basis for the processing
Identity Data, Contact Data, Employment Information, Marketing and Communications Data	To manage our relationship with you which will include: • Notifying you about changes to our policies, terms and other administrative information such as reminders, technical notices, updates and security alerts. • Asking you to leave a review or take a survey	Necessary for our legitimate interests (to keep records about changes to our terms and policies, to ensure that any changes are communicated to you and obtain feedback about our Site and our services)
	To respond to complaints and provide you with information and materials that you request from us.	It is in our legitimate interests to respond to your queries and provide any information and materials requested in order to maintain good customer relations.

Identity Data, Contact Data, Technical and Usage Data	To administer and protect our business and the Site (including troubleshooting, data analysis, testing, systems maintenance, support, reporting and hosting of data).	Necessary for our legitimate interests (for running our business and the Site).
Marketing and Communications Data, Contact Data and Technical and Usage Data	To deliver relevant website content and marketing materials to you, invite you to events and other functions we believe may be of interest to you and measure or understand the effectiveness of the information we provide to you.	Consent (if required under applicable law); or Necessary for our legitimate interests (to grow our business and to inform our marketing strategy)
Technical and Usage Data	To use data analytics to improve our website, services, marketing, relationships and experiences.	Consent

11. DISCLOSURE OF YOUR PERSONAL INFORMATION TO THIRD PARTIES

We may share your personal information with the following (as required in accordance with the uses set out above):

- **Service providers and advisors:** we may share your personal information with third party vendors and other service providers that perform services for us or on our behalf, which may include providing email, advertising, web hosting or analytics services.
- **Business partners:** we may share your personal information (such as contact details) with our business partners, such as other professional advisors, where this is necessary in the normal course of our business.
- **Purchasers and third parties in connection with a business transaction:** your personal information may be disclosed to third parties in connection with a transaction, such as a merger, sale of assets, reorganisation, financing or acquisition of all or a portion of our business.
- **Law enforcement, regulators and other parties for legal reasons:** we may share your personal information with third parties as required by law or if we reasonably believe that such action is necessary to (i) comply with the law and the reasonable requests of law enforcement; (ii) detect and investigate illegal activities and breaches of agreements; and/or (iii) exercise or protect the rights, property, or personal safety of Ivanyan & Co, its users or others.

We will not sell, rent, lease or otherwise share your personal information except as outlined in this Privacy Policy or without obtaining your consent beforehand.

12. SECURITY OF YOUR PERSONAL INFORMATION

We use appropriate technical and organisational security measures (including encryption) to protect personal information both online and offline from unauthorised use, loss, alteration or destruction. Where data processing is carried out on our behalf by a third party, we take steps to ensure that appropriate security measures are in place to prevent unauthorised disclosure of personal information.

Despite these precautions, however, we cannot guarantee the security of information transmitted over the Internet or that unauthorised persons will not obtain access to personal information.

13. HOW LONG WE KEEP YOUR PERSONAL INFORMATION

We will only retain your personal information for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal information for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal information, we consider the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information, whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

14. YOUR RIGHTS

In accordance with applicable privacy law, you have the following rights in respect of your personal information that we hold:

- **Right of access.** You have the right to obtain access to your personal information.
- **Right of portability.** You have the right, in certain circumstances, to receive a copy of the personal information you have provided to us in a structured, commonly used, machine-readable format that supports re-use, or to request the transfer of your personal information to another person.
- **Right to rectification.** You have the right to obtain rectification of any inaccurate or incomplete personal information we hold about you without undue delay.
- **Right to erasure.** You have the right, in some circumstances, to require us to erase your personal information without undue delay if the continued processing of that personal information is not justified.
- **Right to restriction.** You have the right, in some circumstances, to require us to limit the purposes for which we process your personal information if the continued processing of the personal information in that way is not justified, such as where the accuracy of the personal information is contested by you.
- **Right to object.** You have the right to object to any processing based on our legitimate interests in certain circumstances. You can also object to

our direct marketing activities for any reason by clicking the “unsubscribe” link set out in any marketing communication you receive.

- **Right to withdraw consent.** If you have provided consent to any processing of your personal information, you have a right to withdraw that consent but without affecting the lawfulness of processing based on consent before its withdrawal.

Please note that not all of the above rights are absolute and we may be entitled to refuse requests, wholly or partly, where exceptions under applicable law apply.

For example, we may refuse a request for erasure of personal information where the processing is necessary to comply with a legal obligation or necessary for the establishment, exercise or defence of legal claims. We may refuse to comply with a request for restriction if the request is manifestly unfounded or excessive.

15. COOKIES AND OTHER TRACKING TECHNOLOGIES

We use cookies and similar technologies on the Site for various purposes, including improving your experience of the Site. For more information about cookies and why we use these, please refer to our [Cookies Policy](#).

16. ENQUIRIES

If you have any questions or concerns regarding our Privacy Policy or practices, please contact us using the details provided in the [Contacting Us](#) section above.

17. CHANGES TO OUR PRIVACY POLICY

We reserve the right to change this Privacy Policy from time to time. Any changes will be posted on the Site with an updated revision date. If we make any material changes to this Privacy Policy, we may notify you by email or by means of a prominent notice on the Site prior to the change becoming effective.