

PRIVACY POLICY

Last updated: April 2026

1. Data Controller

Star Castle Investments Limited

Hong Kong

For privacy-related inquiries: shanghaigather@gmail.com

2. Introduction

This Privacy Policy explains how personal data is collected and processed when users interact with this website.

We are committed to handling personal data in accordance with applicable data protection laws, including, where applicable, the General Data Protection Regulation (GDPR).

3. Data Collected

We may collect:

- contact data (name, email, phone)
- communication data
- technical data (IP address, browser type, device information)

We do not intentionally collect sensitive personal data.

4. Legal Basis for Processing

We process personal data based on:

- legitimate interest (communication and website security)
- pre-contractual measures (responding to user inquiries)
- legal obligations
- user consent (where required)

5. Purpose of Processing

Data is used for:

- responding to inquiries
- managing potential business relationships
- improving website functionality
- ensuring security

6. Data Sharing

Personal data may be shared with:

- service providers
- professional advisors
- competent authorities where required by law

We do not sell personal data.

7. International Data Transfers

Due to the international nature of the Company's activities, personal data may be transferred to and processed in jurisdictions outside the user's country of residence, including jurisdictions that may not provide the same level of data protection.

Where applicable, such transfers are carried out using appropriate safeguards in accordance with applicable data protection laws.

8. Data Retention

Personal data is retained only for as long as necessary to fulfill the purposes described or to comply with legal obligations.

9. User Rights

Where applicable, users may:

- access their data
- request correction or deletion
- object to processing
- request data portability

Users also have the right to lodge a complaint with a competent data protection authority.

10. Security

We implement reasonable technical and organizational measures to protect personal data, but absolute security cannot be guaranteed.

11. Cookies

For information on cookies, please refer to the Cookie Policy.

12. Updates

This Privacy Policy may be updated from time to time.

13. Contact

Users may contact the Company using the details provided above.