



Privacy Policy

Effective Date: 13 June 2025

Welcome to **Wellness With Ning** ("WWN", "we", "our", or "us"). We respect your privacy and are committed to protecting the personal data you share with us. This Privacy Policy explains how we collect, use, disclose, store, and protect your information when you visit <https://www.wellnesswithning.com> (the "Site") or use our digital products and services (collectively, the "Services").

Legal framework: WWN is headquartered and operates in Hong Kong. Accordingly, we comply with the **Personal Data (Privacy) Ordinance (Cap. 486) ("PDPO")**. Where feasible, we also align with the **EU General Data Protection Regulation ("GDPR")**. In the event of conflict, **PDPO requirements prevail**.

1. Who We Are — Data Controller

Details	Information
Business name	Wellness With Ning
Address	21 Discovery Bay Road, Hong Kong
Contact email	successwithning@gmail.com

WWN determines the purposes and means of processing your personal data and is therefore the **Data Controller** for PDPO and GDPR purposes.

2. Personal Data We Collect

Category	Examples
Identity data	First and last name, account username
Contact data	Email address, telephone number, postal address
Transaction data	Details of digital product purchases, payment status (processed via third-party processors; we do not store full card numbers)
Usage data	Pages visited, links clicked, referring pages, session times

Category	Examples
Marketing preferences	Subscription status, opt-in records
Wellness feedback (optional)	Self-reported wellness interests or survey responses

We do **not** intentionally collect sensitive categories of data (e.g. health records) as defined in GDPR Art. 9 or PDPO unless you voluntarily provide such information.

3. How We Collect Data

1. **Direct interactions** — When you complete a subscription form, buy a product, participate in surveys, contact us, or create an account.
2. **Automated technologies** — Cookies and similar technologies that gather Usage Data.
3. **Third parties** — Payment processors, analytics providers (e.g. Google Analytics), and social media platforms may send us limited data per their privacy terms.

4. Purposes & Legal Grounds for Processing

Purpose	PDPO Basis (DPP)	GDPR Legal Basis
Provide and manage the Site & Services	DPP1 – Collection for lawful purpose	Performance of a contract (Art. 6 (1)(b))
Process transactions & deliver products	DPP3 – Use consistent with purpose	Performance of a contract (Art. 6 (1)(b))
Respond to enquiries & support requests	DPP3	Legitimate interests (Art. 6 (1)(f))
Send marketing emails, newsletters & offers	DPP3 (with notice)	Consent (Art. 6 (1)(a))
Improve Site performance & user experience	DPP4 – Data Security	Legitimate interests (Art. 6 (1)(f))
Comply with legal or tax obligations	DPP3	Legal obligation (Art. 6 (1)(c))

You may withdraw consent for marketing at any time by clicking the **Unsubscribe (if one is provided)** link in any marketing message or by emailing us.

5. Data Retention

We keep personal data **only for as long as necessary** to fulfil the purposes outlined above or to satisfy legal, accounting, or reporting requirements, after which it is securely erased or anonymised. Subscription email data is retained until you unsubscribe or request deletion.

6. Data Disclosure & International Transfers

We may share data with:

- **Service providers** (e.g. Wix.com Ltd., payment gateways, email marketing tools) under written contracts that impose confidentiality and security obligations.
- **Professional advisers** (lawyers, auditors) under confidentiality obligations.
- **Regulators or authorities** when required by law.

Servers may be located **outside Hong Kong** (e.g. in the EU, US, or Israel). Where we transfer data internationally, we use **contractual safeguards** such as Standard Contractual Clauses or rely on PDPO s.33 exemptions until local regulations are updated.

7. Your Rights

7.1 Rights Under PDPO

- **Data Access Request (DAR)** — obtain a copy of your personal data we hold.
- **Data Correction Request** — correct inaccurate or incomplete data.

We will respond within the statutory 40-day period. An administrative fee may apply as permitted by law.

7.2 Additional Rights Under GDPR (where applicable)

- **Erasure ("Right to Be Forgotten")**
- **Restriction of processing**
- **Data portability** (machine-readable copy)
- **Objection to certain processing** (e.g. direct marketing)

We respond within **one month** (extendable by two months where complex).

How to exercise your rights: Email successwithning@gmail.com with (i) your name, (ii) data request details, and (iii) verification proof (e.g. email confirmation). We will confirm receipt and guide you through the process.

8. Data Security

We implement **technical and organisational measures** proportionate to the risk, including:

- SSL/TLS encryption on all Site traffic (HTTPS)
 - Role-based access controls & two-factor authentication for admin accounts
 - Secure data centres and firewalls managed by Wix
 - Regular backup and vulnerability scans
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9. Cookies & Tracking Technologies

We use cookies to:

- Remember preferences
- Analyse Site traffic (Google Analytics)
- Facilitate secure logins & shopping cart functionality

You can control cookies through your browser settings.

10. Third-Party Links

Our Site may include links to external sites (e.g. social media). WWN is **not responsible** for the privacy practices of those sites. Please review their policies before providing personal data.

11. Children's Privacy

Our Services are **not directed at children under 18**. We do not knowingly collect personal data from minors. If you believe we have done so inadvertently, please contact us and we will delete such data promptly.

12. Changes to This Policy

We may update this Privacy Policy from time to time. Material changes will be announced on our Site and, where appropriate, via email. The "Effective Date" above indicates when this policy was last revised.

13. Contact Us

If you have questions about this Privacy Policy or wish to exercise any data rights, please contact our **Data Protection Officer (DPO)**:

- **Email:** successwithning@gmail.com