Capture Limited – Privacy Policy

Last Updated: November 25th, 2025

1. Introduction

Capture Limited ("**CaptureHK**", "**we**", "**our**", "**us**") operates in accordance with the Personal Data (Privacy) Ordinance (Cap. 486) of the Hong Kong SAR. We recognise the personal nature of the materials and information you entrust to us and are committed to responsibly managing, protecting, and processing your data and media.

For the purposes of this Terms, our "**Services**" and "**Products**" encompass a comprehensive range of offerings, including without limitation:

- physical-to-digital conversion, restoration, and enhancement of Customer Media;
- creation and delivery of Digital Files;
- access to Capture Storage Services, through which customers may store, download, or share their Digital Files; and
- other accessories or ancillary services, including electronic photo frame products, film products, camera rental services, disposal services and logistics.

This Privacy Policy explains how we collect, use, disclose, and safeguard your personal information.

By purchasing our Products or Services, you agree to the terms of this Privacy Policy.

2. Personal Data and Customer Media We Collect

a. Definition of Customer Media

"**Customer Media**" refers to any materials you provide to CaptureHK—whether physical or digital—for digitisation, enhancement, storage, or processing. This includes but is not limited to photographs, albums, negatives, slides, videotapes, film reels, audio cassettes, compact discs, portable drives, digital image or video files, and related items. These materials may contain personal images, voices, likenesses, or other sensitive family content.

b. Information You Provide

When you engage with us or purchase our Products or Service, you may provide:

- basic identification and personal data, such as your name, gender, date of birth;
- contact details, such as phone number, email address, and mailing or billing address;
- payment information and transaction records, such as credit card information;
- login username and password of our website and membership program;
- correspondence and instructions you send to us
- your Customer Media, including any physical or digital images, audio, video, or metadata contained in the materials you submit for digitisation or digital enhancement.

Providing your personal data to us is voluntary. However, if you do not provide the necessary information, or if the information provided is inaccurate or incomplete, we may be unable to deliver our products or services or to process your requests.

c. Automatically Collected Information

When you visit our website or use our applications, we automatically collect:

- device and connection information (browser type, operating system, IP address, hardware model, time zone, language);
- usage and diagnostic data (site activity, session duration, interaction logs)
- cookies and analytics data through, but not limited to, tools such as:
  - Google Analytics – usage and site-performance insights
  - Google Ads and Facebook Ads – advertising performance and demographics
  - HubSpot – customer management and marketing automation
  - Intercom – customer communication and support
  - Google Tag Manager – tag deployment and tracking management

We may update or add analytics and marketing tools from time to time. You can manage cookie preferences or disable tracking in your browser settings.

d. Google Photos Integration

If you choose to connect your Google Photos account, we will only access it after you grant permission. This integration enables you to upload your newly digitised or enhanced memories directly to your Google Photos library, and to view or organise them with ease.

We will only use the features necessary to provide this function, and will never view, share, or modify your existing Google Photos content unless you expressly request it. You can revoke CaptureHK's access at any time via your Google account settings.

All access and use of Google Photos information complies with Google's privacy and data protection rules, including the Google API Services User Data Policy and its Limited Use requirements.

3. How We Use Personal Data and Customer Media

Your Personal Data and Customer Media may be used for one or more of the following purposes (the "**Purposes**"):

- providing our Products and Services;
- processing orders, payments, and delivery logistics;
- performing scanning, restoration, and digital editing work on Customer Media;
- conducting internal quality control and securely transferring your digitised or enhanced files;
- providing customer support and responding to inquiries;
- fulfilling legal, regulatory, or insurance obligations;
- conducting anonymised analysis and AI research to improve our workflow, products, and service quality;
- communicating with you, including without limitation sending service notifications or, with your consent, marketing communications;
- verifying your identify and any accounts you have with us;
- administering any loyalty or other marketing programs;
- any other purposes reasonably related to any of the above.

We do not reproduce or distribute your identifiable Customer Media for any external or commercial purpose without your explicit written consent.

4. Direct Marketing

From time to time, we may send you marketing materials about our products, services, offers, promotions, campaigns, or events. You may withdraw your consent or opt out of receiving direct marketing communications at any time.

4. Data and Media Retention

- Customer Media (physical): Retained only for the time necessary to complete digitisation and order fulfilment, after which it is returned or securely disposed of in accordance with your selected option or signed disposal consent. Please refer to the section titled "*Shipping, Collection & Risk of Loss*" in our Terms of Service for details regarding any potential storage costs related to Customer Media.
- Digitised Files: Stored on secure servers for the duration of your active account.
- Personal Data: Retained only as long as necessary to fulfil service, billing, legal, or accounting obligations.

After the relevant retention period, CaptureHK securely deletes, anonymises, returns or destroys the personal data and Customer Media to prevent unauthorised recovery.

5. Disclosure and International Transfers

We may share limited personal data or Customer Media with trusted service partners who assist us in providing you the Products and Services and for the fulfilling the Purposes. These service providers include but are not limited to, logistics providers, payment processors and secure cloud-storage vendors. All such third parties act as data processors under strict confidentiality and data-protection agreements and are bound to handle Customer Media solely for the agreed purpose.

We may be required to disclose your information to government, regulatory authorities or law enforcement authorities that have legal jurisdiction over our operations.
When necessary, we may share your information with our professional advisers, including our lawyers, accountants and insurers.

Your information may be processed in Hong Kong or other jurisdictions where CaptureHK or its affiliates operate. When transferring data outside Hong Kong, we take appropriate safeguards to ensure an equivalent level of protection consistent with the PDPO.

6. Security of Data and Customer Media

We apply comprehensive technical and organisational safeguards to protect personal data and Customer Media, including restricted facility access, encryption of digital files, and confidentiality agreements with staff. While we maintain industry-standard protections, no digital or physical system is completely infallible.

7. Your Rights and Choices

You may, at any time, request access to, correction of, or deletion of your personal data or digitised files, withdraw consent for marketing communications, or request confirmation of secure disposal of your Customer Media. Requests can be made by emailing support@capture.hk. We will respond within a reasonable timeframe as required under the PDPO.

8. Children's Privacy

Our Service is intended for individuals aged 18 and above. We do not knowingly collect personal data or Customer Media directly from anyone we know to be under the age of 18. If you are under the age of 18, you should purchase our Products or use our Services only with the involvement of a parent and guardian and should not submit any personal data to us. If you believe that a minor's personal data has been submitted to us, please contact us immediately so that we can remove or return it securely.

9. Updates to This Policy

We may update this Privacy Policy periodically to reflect legal, technical, or operational changes. When updates are made, the revised version will be posted on our website with the updated "Last Updated" date.

10. Contact Us

If you have questions, requests, or concerns regarding this Privacy Policy or the handling of your Customer Media, please contact:

Capture Limited
10/F Sea Bird House
22–28 Wyndham Street, Central, Hong Kong SAR
Email: support@capture.hk