

# 欧盟居民隐私政策

## Privacy Notice for EU Residents



## Overview

After four years of preparation, the General Data Protection Regulation (GDPR) was approved by the European Union (EU) Parliament on 14 April 2016, the Regulation 2016/679 of the European Parliament and of the Council requires controllers of personal data to implement data protection principles. In response to the regulation, this *Privacy Notice* gives a summary of:

- What do we collect about you
- How do we control the information about you
- With whom we might share it
- Measures taken to safeguard your privacy
- Your rights to your information

## Eligibility

We take the most appropriate approach to serve our diverse range of users, this privacy notice exclusively applies to the individuals within the European Union (EU) and the European Economic Area (EEA), including Switzerland and Croatia. As royal assent has already been granted to the *Data Protection Act 2018*, the scheduled withdrawal of United Kingdom (UK) from the EU will not impact the compliance of GDPR within UK. Hence, UK is considered as a part of the EU for the purpose of this privacy notice.

In the event that you have concealed your connection with EU or EEA and have not informed us otherwise, or, proven by overwhelming evidence that you are not a resident of EU, EEA, or UK. A different arrangement of data protection will be applied to you, kindly refer to our *Standardised User Agreement* [📄](#) for the privacy policies that apply to you.

## Who are we

We are the **DGJoy Co., Ltd.**; We are the legal entity that operates Keylol.com. DGJoy is a company registered in the People's Republic of China. We are the data controller in this privacy notice.

Although not registered within EU, we inevitably provide internet access to Keylol.com to EU residents. As a part of our objective to deliver a great online community to every country in the world, we are facilitating individuals to have a final say in their personal data.

## Data collection

Information about you – whether generated intentionally or unintentionally – might be collected from different venues such as:

- Directly from you or a third party acting on your behalf
- From our subsidiary services
- From public domain
- Generated by your inputs and user behaviours
- From other organisations

While most analytics data are randomised, some of the user portrait can still be traced back to your identity, they are still considered to be your personal data and protected by the GDPR.

## Data processing

Your information will be used to cater services you have requested. In addition to fulfilling our end of service agreement It will also be for other purposes such as:

- Confirming your identity
- Protect your interest from malicious attacks
- Enhancing user experience, e.g. content customisation as you have instructed
- Informing us about your account usage
- Offer updates and news information unless instructed not to do so
- To prevent delivering less-relevant commercial ads

## Who we are permitted to share data with

Occasionally, we are facilitated by the third-party service providers, we will share your data with organisations in partnership and contract. Our subsidiary services that operates under the same business entity will also be using the data collected at

Keylol for corresponding purposes. When ordered by the court or an authority with jurisdiction over us, your data will be shared accordingly given that doing so does not contradict the law.

## How long will information be kept

We will keep your information for as long as you have maintained an agreement with us or have upheld a relationship with us, whichever is later. After the termination of the agreement, your information will be kept as a part of continuation of the service we are providing, unless you have specifically instructed not to do so. It is possible that we will keep some information for legal purposes such as handling complaints from you or a third party, or other purposes such as to prevent cybercrimes.

## Data roaming

You should be informed that your data is very likely stored outside the European Economic Area, the place where it is physically stored may not have laws that provide the same level of protection for personal information. We will, however, ensure it will reach an adequate level of protection. We will endeavour to treat your personal data as private and confidential under all circumstances as much as the law permits.

## Rights as a data subject

Under the GDPR regulation, you are entitled several rights about your information. e.g. to see what we hold, to ask us to share it with another party, ask us to update incorrect or incomplete details, to object to or prevent nominated types of data process, to make a complaint etc.

However, we are currently unable to offer the *right to rectification* of a certain account due to technical difficulties. We will be offering an alternative solution upon requested, likely by transferring all your personal data to a new account.

## Exercise your rights


As mentioned above, you have certain rights as a data subject, and we will support you by honouring our duty as the data handler. Kindly note that these rights might

not be applicable in all circumstances, to access the data we are holding, or to exercise your right(s) as a data subject, you need to make a **Subject Access Request (SAR)**. To submit such a request, please write to us at:



Unit 21697  
PO Box 6945  
London  
W1A 6US  
United Kingdom

As recommended by the Information Commissioner's Office, we are taking reasonable steps to confirm your identity before providing you with details of any personal information we may hold about you. To do this, you need to attach identification documents and to show the proof that you are entering a contract with us while you are a long-term EU resident. Please provide any combination of **two** from the following list of (a) to (e):

- a) a photocopy of the profile page of your full current British or EU passport, please note that British National (Overseas) passport is not accepted for this purpose as they do not automatically guarantee the right of abode in UK and are not considered a UK national by the European Union (EU).
- b) A photocopy of both obverse and reverse side of your EU driving licence issued not more than 5 years ago.
- c) An original cheque from your chequebook (make sure you have voided the cheque); **and**, 3 separate bank statements within the last six months.
- d) 2 original letters from your local city/town council, one of which must be regarding to your voting registration or council tax status; **and**, 3 separate utility bills dated not more than six months ago.
- e) A photocopy of both obverse and reverse side of your current biometric residence permit (BRP) issued in the UK It can also be any EU residence permits featuring *Zeus bull* design  (Aufenthaltstitel, Uzturēšanās atļauja, Titre de séjour, Permiso de residencia, etc.).

Note that original letters and bills should be printed by the service provider and delivered through a public courier, self-printed documents are considered as photocopies. Unless requested and have the cost of delivery paid for, submitted documents will not be returned.

In order for us to understand your request, please download, print, and fill in the ***Subject Access Request Form*** (see form G1 in the appendix). Without which your request may face delay in process or even be rejected.

Once we have received your request and identification documents, we will have one month to fulfil your request. Where for some reason this will not be possible, for instance due to large volumes of data being involved, or having to deal with technical difficulties, we are permitted by law to take up to an additional two months to fulfil your request. Where any such delay is anticipated we will inform of you this as soon as possible along with details of when we expect to be able to provide you with the requested documentation.

You shouldn't be charged any fee by us in order to deal with your request in most circumstances. However, you are responsible for the cost to deliver your request, this will be charged by the postal service of your choice.



# Information we need to process a Subject Access Request (G1)

*Subject Access Request Form - Please write in English*

## Part 1 > About you

1.1 Given name(s)  
as shown in government document

1.2 Family name

1.3 Date of birth

D	D		M	M		Y	Y	Y	Y
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1.4 Sex  
cross (x) your selection

Male

Female

## Part 2 > Your proof of identity

2.1 Which 2 of the followings are you sending in as your proof of identity?  
cross (x) your answers; see article for details

(a) photocopy of your EU/EEC/EEA passport

(b) photocopy of your EU driving licence

(c) original cheque (voided) and 3 bank statements

(d) two original letters from local council and 3 utility bills

(e) photocopy of your EU/EEA residence permit

## Part 3 > Your Keylol.com account

3.1 Numeric User ID (UID)  
UID can be found by in the URL link of your Keylol profile page

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3.2 Do you still have the normal access to your account?  
cross (x) your answer and go to corresponding section

Yes -> go to Part 4

No -> go to question 3.3

3.3 Please provide as much as possible details about your account  
you may answer this question in Chinese

3.4 City or town where your account was registered, if able to provide

3.5 Associated email of your account, if able to provide

 @ 

3.6 Phone number associated to your account, if able to provide

3.7 Last geographic location this account was used, if able to provide



## Part 4 > Your Subject Access Request

### 4.1 Right(s) to be exercised

Cross (x) where appropriate

- The right to be informed about our processing of your personal data
- The right to have your personal data corrected if it is inaccurate, and to have incomplete personal data completed
- The right to object to the processing of your personal data
- The right to have your personal data erased (“right to be forgotten”)
- The right to move, copy, or transfer your personal data (“data portability”)
- Rights regarding automated decision making, including profiling
- Other right(s)  
please elaborate in the section 4.2

### 4.2 Detailed instructions

describe your requests in a measurable manner so that we may carry them out, you may answer this question in Chinese

Request 1

Request 2

Request 3

Other instructions

Attach extra paper if you require more space to outline your request

4.3 If applicable, draw the time period for your request

4.3.1 From

4.3.2 To

D	D		M	M		Y	Y	Y	Y
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D	D		M	M		Y	Y	Y	Y
---	---	--	---	---	--	---	---	---	---

4.4 Communication email

	@	
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**Part 5 > Declaration**

I declare:

- That the information given on this form whether input by myself, input on my behalf by a third party or automatically pre-populated is complete and correct to the best of my knowledge and belief.
- The documents supplied with this application are genuine and the statements I have made with this application are truthful.
- That, I am the rightful owner of the data being requested and believe I have the right to the request I am making.

I understand:

- Keylol.com (or a therefore entrusted party) may make reasonable checks to confirm the accuracy and authenticity of material I have provided and documents I have submitted with this application.
- All information provided by me will be processed in accordance with the Data Protection Act (DPA) 2018.
- Failure to communicate in English to an acceptable degree will slow down the request, and, in extreme cases, frustrate the request.

I confirm:

- That where a service fee occurs when it is not covered in the standard procedure of dealing with subject access request, or whereas the GDPR permits, I will bare all the cost if such a process cannot be carried on without my contribution.

5.1 Signature of the data subject

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5.2 Date

D	D		M	M		Y	Y	Y	Y
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5.3 Place

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