

# **Privacy Policy Statement**

We strive to safeguard the privacy of the users of our web site ("Users") with respect to their personal data in compliance with the requirements of the Personal Data (Privacy) Ordinance, Chapter 486 of the laws of the Hong Kong SAR ("Ordinance"). In doing so, we will ensure compliance by our staff with the applicable standards of security and confidentiality.

It is the policy of our Group (or "we", "us" and "our" as hereinafter mentioning and collectively means iAdvantage Ltd. and its subsidiaries) to safeguard all personally identifiable information ("Personal Data") provided by Users. Except as set out in this Statement, we do not collect any other Personal Data from Users during their browsing of our web site. When Users visit our web site, we record their visit only as a 'hit' and do not collect any other Personal Data from them. We [and/or our Internet service provider] will however make a record of their visit that shows only the Domain Name Server addresses, and of the pages visited. We use such information only for preparing general statistics on the usage of our web site.

If Personal Data are collected in the process of making enquires or submitting applications for services provided by different operations within our Group, Users will be informed via the respective Personal Information Collection Statements of such purposes and uses, including the extent of their transfer and disclosure; and the right of access to and correction of the collected Personal Data.

In order for us to provide Users with customisable and personalised services, we use 'cookies' to store and sometimes track information about Users. The information collected by means of 'cookies' includes Users' log-in name and his or her navigation pattern. This is done without Users being aware that it is occurring. Generally, we use 'cookies' to estimate our audience size; to track Users' progress and number of entries in our promotional activities; and to measure Users' traffic patterns. Personal Data collected by means of 'cookies' will not be disclosed to any third parties except to those parties within our Group and the SHKP Group (i.e. our holding company, Sun Hung Kai Properties Limited, and its subsidiaries).

Once we have obtained User's Personal Data, it will be maintained securely in our system. We shall retain Users' Personal Data for so long as he or she is a registered user of our web site. Only the authorised staff, who have been properly trained, will be permitted access to such Personal Data, and we shall not release such Personal Data to any external parties except those parties set out in our Personal Information Collection Statement without User's consent.

We may from time to time send direct marketing materials promoting products and services to Users based on their Personal Data provided that we have received consent



or indication of no objection from the Users but shall stop doing so when being advised in writing that Users do not wish to receive further materials from us. Suitable opt-out facilities will be provided during the direct marketing process.

We shall implement necessary measures to ensure that the privacy of Users is properly protected. However, given the nature of the Internet, we cannot guarantee that there is "perfect security".

In order to provide Users with more information and services, we use third party content providers and service providers, and provide links to other web sites. These third parties may collect Personal Data about Users when Users make use of their services. These third parties are responsible for adhering to their own privacy policies and practices and our Privacy Policy Statement does not cover such third party practices and we will not assume any responsibility or liability to Users in connection with their dealing with Personal Data of Users.

Should Users have any queries about our privacy policy and practice, please e-mail to our Data Protection Officer at mailto:dpo@sunevision.com

#### **Personal Information Collection Statement**

Our Group is committed to safeguarding privacy of the Users with respect to their Personal Data. This statement is given in compliance with the requirements of the Ordinance, to notify Users of certain matters when collecting information from them. This statement may change from time to time, so please check back periodically. By visiting, browsing, subscribing and/or logging-in to this web site to use our services, Users agree to be bound by this statement at that time in force and agree to us (i.e. any person or bodies corporate or division within our Group, including SHKP Group) using, disclosing and transferring data of Users for the purposes and in the manner set out herein.

#### **Collection of Data**

At the time of subscription and at other times when using this web site, Users may be asked to provide us with Personal Data, such as name and e-mail address. It is necessary for us to collect information of Users for providing them with various services and allowing them to participate in various activities offered on this web site. If Users fail to provide the Personal Data requested, we will not be able to provide Users the services and allow Users to participate in activities available on this web site.

#### Purpose and Use of Data

The information we collected will be used for the following purposes :-

1. to monitor use of this web site and to help its further development;



2. to compile aggregate statistics about Users and to analyse web site usage;

3. to collect data for identity verification and records and to maintain contact lists for correspondence;

4. to operate internal control, resolve disputes, troubleshoot problems and enforce our terms of use;

5. to deliver information to Users that we believe they may have interest in, such as targeted banners, new services and products and other promotions and marketing materials;

6. to contact Users regarding administrative notices and communications relevant to use by Users of this web site and to respond to their request.

We may also use Personal Data of Users to match user information with third party data (i.e. to compare two sets of Personal Data collected for different purposes). By subscribing to this web site or by logging-in, Users consent to us carrying out this matching procedure when we deem it is necessary in order to provide our services.

In addition, we will also use information of Users in the following manner: -

1. We will share Personal Data of Users with our business partners, subsidiaries and associated companies, including SHKP Group, for any purpose(s) set out in this Personal Information Collection Statement.

2. In order to provide Users with more information and services, we have arranged content providers and service providers to provide information and services. It may be necessary for us to share Personal Data of Users with these content providers and service providers.

If we add new features or services that might require the sharing of Personal Data of Users with an additional advertiser or sponsor, we will provide Users with notice and the opportunity to opt-out to receive these offers.

# Transfer of Data

Personal Data of Users will not generally be disclosed or transferred to any other party in a form that would identify Users except in the following circumstances:

1. If we use third party suppliers or service providers to facilitate our services, we will have to provide Personal Data of Users to these suppliers or service providers offering such services where Users choose to use these services.

2. We may disclose or access Personal Data of Users when we believe in good faith that the law requires it.



3. We may also disclose or access Personal Data of Users for administrative and other purposes that we deem necessary to maintain, service, and improve our services.

In addition, Personal Data of Users will be accessed by, disclosed or transferred to our business partners, any person or bodies corporate or division within our Group and/or SHKP Group for any purpose(s) set out in this Personal Information Collection Statement.

As the parties mentioned above may have places of business outside Hong Kong, Personal Data of Users may be transferred out of Hong Kong. By subscribing to our web site or by logging-in, Users agree to us transferring their information to these parties outside Hong Kong. We will take all reasonable precautions and exercise all due diligence to ensure that such Personal Data transferred out of Hong Kong will be handled, held, processed and used in compliance with this Statement and the applicable requirements in Hong Kong.

Please also see our Privacy Policy Statement which sets out our general privacy policy and practices in respect of our collection, holding and use of information of Users.

## Access to Data

Users have the right to request access to, and correction of, Personal Data about Users held by us. If Users need to check whether we hold Personal Data of Users or if Users wish to have access to Personal Data of Users and/or to correct any Personal Data of Users which is inaccurate, please fill in the data access request form below and e-mail it to our Data Protection Officer at dpo@sunevision.com Users agree to pay us the reasonable charges incurred by us in relation to administering and complying with request of Users.

Please note that the Privacy Policy Statement and the Personal Information Collection Statement may be amended from time to time without prior notice, and Users are advised to refer to the most updated version whenever Users are using the web site. Users are to be bound by the Privacy Policy Statement and the Personal Information Collection Statement in force at the time when they log-in, browse or visit the web site or any part thereof.

## Personal Data Access Request

https://www.pcpd.org.hk/english/resources\_centre/publications/forms/files/Dforme.pdf