

## Privacy Policy Statement

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### GENERAL

1. This Statement is made by i-CABLE Telecom Limited (collectively "iMobile" , "we" or "us" ) in accordance with the Personal Data (Privacy) Ordinance (Cap. 486) of the Laws of Hong Kong Special Administrative Region (the "PDPO" ).
2. This Statement explains what personal data we collect, how it will be used, and to whom the personal data will be transferred and to whom data access requests are to be addressed. For the purpose of this Statement, personal data shall carry the meaning as defined in PDPO.

### WHAT PERSONAL INFORMATION DO WE COLLECT AND WHY WE COLLECT IT?

3. From time to time, it is necessary for us to collect your personal data in order for us to provide you with the goods or services required, which may include:
  - a. Your names;
  - b. Service installation address, correspondence address and/or billing address;
  - c. Account details, including account numbers, service numbers or user accounts;
  - d. Identity card numbers, passport numbers and House Visit Permit numbers;
  - e. Payment details, including credit card and banking information; and
  - f. Contact details, including contact name, telephone numbers, fax numbers or email address.

You are not obliged to supply to us your personal data, however, we may be unable to provide you with the required goods and services if you are unwilling to do so.

4. In order to enhance your customer experience, further personal data may also be collected on a voluntary basis such as your age, date of birth, gender, education, profession, salary range, hobbies, interests and leisure activities, other related products and services subscribed, family and household demographics, and etc. We will indicate in the relevant forms or application whether the provision of the required personal data is on a voluntary basis.
5. In addition, your online session data may also be collected indirectly on an aggregated and anonymous basis.
6. If you are under the age of 13, you are required to ask your parent or guardian before providing any personal data to us.

### HOW DO WE USE YOUR PERSONAL DATA?

7. Your personal data may be used for one or more of the following purposes depending on the context:
  - a. Verifying your identity;
  - b. Processing your orders for goods and application to subscribe our services;
  - c. Provision of goods and services;
  - d. Administration, operation and management of loyalty programs;
  - e. Administration and management of the goods and services including renewal of services contracts;
  - f. Keeping you informed about our goods and services;
  - g. Marketing and promoting goods and services in the manners set forth in Paragraph 10 hereof;

- h. Matching your personal data with other data collected from other purposes and from other sources including third parties to enhance your customer experience;
- i. Conducting internal analysis and demographic studies;
- j. Designing and improving services and products to cater your needs;
- k. Handling enquiries, complaints and feedbacks;
- l. Daily administration and management of our business;
- m. Communicating with you by email, phone, mail or other means;
- n. Billing;
- o. Processing payment instructions;
- p. Debt recovery (including the use of debt recovery agents and civil proceedings) and credit checking;
- q. Obtaining legal advice and establishing legal claims or defences and in legal proceedings;
- r. Prevention and investigation of fraud and crimes;
- s. Disclosure as permitted or required by law, regulations and court orders in any jurisdiction, and/or as required by any government, regulatory or law enforcement authorities;
- t. Any other incidental or associated purposes relating to the aforesaid and/or any other purposes which you may agree from time to time.

#### **DISCLOSURE & TRANSFER OF PERSONAL DATA**

- 8. To facilitate the purposes set out in paragraph 7 above, we may transfer, disclose, grant access to or share your personal data with the following parties (whether within or outside Hong Kong), and your personal data may be transferred within or outside Hong Kong:
  - a. Any subsidiaries, holding companies associated companies, or affiliates of, or companies controlled by, or under common control with the Company;
  - b. Any person or company who is acting for or on behalf of the Company, or jointly with the Company, in respect of the purpose or a directly related purpose for which the data was provided;
  - c. Any other person or company who is under a duty of confidentiality to the Company and has undertaken to keep such information confidential, provided such person or company has a legitimate right to such information;
  - d. The Company's dealers, agents, contractors, suppliers and other telecommunication, information service providers and content providers; its professional advisers, including its accountants, auditors and lawyers;
  - e. Government and regulatory authorities and law enforcement agencies and other organizations, as required or authorized by law;
  - f. Any financial institutions, charge or credit card issuing companies, credit providers, credit information or reference bureaux, or collection agencies, security agencies, necessary to establish and support the payment of any services being requested;
  - g. Your authorized representatives or your legal advisers when requested by you to do so;
  - h. Telecommunications network operators;

- i. Third Party reward and loyalty programs providers;
- j. Organizations who manage our business and corporate strategies (and for such Purposes), including those involved in a transfer/sale of all or part of our assets or business (including accounts and trade receivables) and those involved in managing our corporate risk and funding functions; and
- k. Any actual or proposed assigned of all or any part of the Business and/or asset of the Company.

#### **SECURITY & RETENTION OF PERSONAL DATA**

9. We strived at all times to ensure that your personal data will be protected against unauthorized or accidental access, processing, erasure or other use. We maintain this commitment to data security by implementing appropriate physical, electronic and managerial measures to safeguard and secure your personal data. Personal data will only be retained for as long as is necessary to fulfil the original or directly related purposes for which it was collected, unless the personal data is also retained to satisfy any applicable statutory or contractual obligations.

#### **USE OF PERSONAL DATA IN DIRECT MARKETING**

10. Subject to your consent and in strict accordance with the provisions of PDPO, we intend to use your personal data including but not limited to the personal data set forth in Paragraphs 3 to 5 hereof to deliver to you information about any goods and services, loyalty programs, activities (including joint collaboration with third parties), newsletters, contests, lucky draws and etc of us and our business partners. The said information may include various classes of marketing subjects including but not limited to mobile devices and accessories, network services such as TV, mobile voice, SMS and data communications, IDD/roaming, Internet connectivity, mobile applications, entertainment and data communications on Internet, other value-added services, as well as computer peripheral, accessories and software (including notebooks, handsets, keyboards, security installations and mobile applications), secretarial services, personal assistance services and information services, gaming, sports, music, beauty products, electronics, technology, ecommerce, mobile payment, travelling, banking, investment, entertainment, transportation, household, fashion, food and beverages, alcohol and tobacco, insurance, education, health and wellness, social networking, charity activities, media and high-end consumer products and services. The said information may be delivered to you by mail, phone, email, fax or other means.
11. We may not use your personal data for direct marketing unless we received your consent or indication of no objection. If you wish to stop receiving direct marketing materials from us, you may write to us in the manner set forth in Paragraph 14 hereof at any time. In any such request, please state clearly your personal information and contact details for identification purposes.

#### **USE OF COOKIES & LOCATION DATA**

12. If you visit any of our websites, we may use cookie files to store and track information about you and your preferences. A cookie is a small text file that our website transfers to your device. The use of cookies means we can better serve you and/or maintain your information across multiple pages within or across one or more sessions. Most web browsers automatically accept cookies, but if you prefer, you can edit your browser options to block them in future. Cookies contain information about you and your preferences. For example, if you inquire about rates and availability, the site might create a cookie that contains the details you entered. Or it might only contain a record of which pages within the site you visited to help the site customize the view for you the next time you visit. Only the information that you provide or the choices you make while visiting a website can be stored in a cookie. For example, the site cannot determine your email address unless you choose to type it. Allowing a website to create a cookie does not give that or any other site access to the rest of your device, and only the site that created the cookie can read it.

13. We may use your location data to keep track of your activity patterns and preferences in order to improve the level of service you receive. Your location data may be combined with other information we receive from third parties to provide you with better service and, where you have consented to receive direct marketing, we may provide you with targeted advertisements, content, features, deals and offers in the manner set forth in Paragraph 10 hereof.

#### **DATA ACCESS OR CORRECTION**

14. You are entitled to access or correct your personal data held by us. If you wish to obtain a copy of any of your personal data or if you believe that any of your Personal Data which we collect and maintain is inaccurate, please write to us at the address below:

**Data Privacy Officer**

**i-CABLE Telecom Limited**

**P.O. Box 357 Tsuen Wan Post Office**

A request for access to or correction of your personal data, or for information regarding policies and practices and kinds of personal data held by us may be sent to us at the following address. In accordance with the PDPO, we have the right to charge a reasonable fee for the processing of any data access request.

#### **OTHERS**

15. We reserve the right to amend this Statement from time to time.
16. If there is any discrepancy between the English version and Chinese version of this Statement, the English version shall always prevail.