

私隱政策聲明

學聯海外升學中心有限公司（“本公司”）

私隱政策聲明

1. 引言

- 1.1 此聲明乃採納為本公司的私隱政策聲明（“本聲明”）。訂立本聲明的目的，是為確立本公司全力執行及遵守保障資料原則的政策及實務，以遵守個人資料（私隱）條例（“條例”）各項條款及條文，以及由本公司頒布的相關指引。
- 1.2 為確保依從條例規定，本公司備有不時更新的保障個人資料內部指引以供員工參考及使用。
- 1.3 本公司保留修改本聲明的權利。

2. 本公司持有的個人資料的種類

概括而言，本公司持有的個人資料只有二大類，包括與客戶有關的個人資料及與僱傭有關的個人資料。

3. 使用個人資料的目的

- 3.1 當客戶需要本公司提供產品或服務或向本公司作出有關查詢，或與本公司進行其他業務運作時，需不時向本公司提供有關的資料。如客戶未能提供該等資料將可能導致本公司未能進行交易，建立或延續業務關係或提供其它服務。
- 3.2 準客戶及客戶的資料可能會用於下列用途：
 - (i) 處理客戶所作查詢或處理客戶所要求的產品或服務，包括訂購產品或服務；
 - (ii) 為客戶提供所要求的產品或服務，包括訂購產品或服務及處理客戶就本公司的產品或服務提出的其他要求，包括但不限於要求增加、更改或取消要求的產品或服務、付款、投訴及復效申請等；
 - (iii) 於客戶所作的產品或服務要求、查詢或相關的事宜上執行及處理有關功能及活動，如核實身份、資料核對；
 - (iv) 行使本公司因不時向閣下提供訂購產品及服務而享有的權利，例如

向閣下要求繳付款項；

- (v) 設計產品及服務以提升本公司的服務質素；
- (vi) 製作數據及進行研究；
- (vii) (在已取得資料當事人的同意 (包括表示不反對) 下,但條例所指明的豁免情況除外) 營銷下列服務、產品及其他標的：
 - (a) 旅遊、升學、遊學、國際學生証、保險及相關服務及產品；
 - (b) 獎賞、客戶或會員或優惠計劃及相關服務及產品；及
 - (c) 本公司的品牌合作夥伴提供之服務及產品 (該等品牌合作夥伴的名稱會在有關服務和產品的申請表格及/或宣傳資料上列明)：(請參閱本公司收集個人資料聲明第(4)段有關本公司如何在直接促銷中使用個人資料的詳情。任何資料當事人如不希望本公司使用其個人資料作直接促銷用途,可根據本聲明第(8)段的聯絡方法,向本公司的個人資料保障組提出。)
- (viii) 履行根據下列對本公司具有約束力或適用或期望其遵守的就披露及使用資料的義務、規定及/或安排:
 - (a) 不論於香港特別行政區 (『香港』)境內或境外及不論目前或將來存在的對其具法律約束力或適用的任何法律；
 - (b) 不論於香港境內或境外及不論目前或將來存在的任何法律、監管、政府、稅務、執法或其他機關,或第三方服務供應者的自律監管或行業組織或協會所作出或發出的任何指引或指導；
 - (c) 本公司跟相關本地或外地的法律、監管、政府、稅務、執法或其他機關,或第三方服務供應者的自律監管或行業組織或協會的司法管轄區有關的金融、商業、業務或其他利益或活動,而向該等本地或外地的法律、監管、政府、稅務、執法或其他機關,或有關的自律監管或行業組織或協會承擔或被彼等施加的任何目前或將來的合約或其他承諾;
- (ix) 允許本公司的權益或業務的實際或建議承讓人、受讓人、參與人或附屬參與人,就擬涉及的轉讓、出讓、參與或附屬參與的交易進行評估；及
- (x) 與上述有關的其他用途。

3.3 與僱傭有關的個人資料(包括準僱員的個人資料)可能會用於下列用途:

- (i) 處理受聘申請；
- (ii) 釐定及檢討工資、獎金及其他福利；
- (iii) 考慮升職、培訓、調用或調職；
- (iv) 評審僱員福利和享有權的資格及有關管理；
- (v) 為僱員出具諮詢證明書；
- (vi) 為僱員向法定機關或有關機構申領與僱傭直接有關或相關的持牌資格；
- (vii) 監察遵守本公司內部規則的情況；
- (viii) 遵守任何適用法例，或對本公司具有約束力或適用或要求其遵守的指引或指導(不論於香港境內或境外及不論目前或將來存在的)，或任何其跟本地或外地的法律或其他機關或有關的自律監管或行業組織或協會訂立的任何目前或將來的合約或其他承諾；及
- (ix) 與上述有關的其他用途。

4. 個人資料的保安

本公司的政策為確保個人資料的保安及會因應資料的敏感程度及因擅自查閱所造成的損害程度提供適度的保障，以防止資料被擅自或意外地查閱、處理、刪除或作其他用途。為達到適當程度的保安，本公司的一貫做法為透過提供安全的儲存設施，以及在資料存置設備實施保安措施，來嚴格限制資料被查閱。本公司亦會採取措施以確保處理該等資料的人士具備良好操守、審慎態度及辦事能力。資料只會以妥善保安的方式傳送，從而防止資料被擅自或意外地查閱。如本公司聘用(不論是在香港或香港以外聘用)資料處理者，以代本公司處理個人資料，本公司將採用合約規範方法或其他方法，以防止轉移予該資料處理者作處理的個人資料未獲准許或意外地被查閱、處理、刪除、喪失或使用。

5. 從互聯網收集個人資料

5.1 有關本公司從互聯網收集個人資料，本公司會採納以下實務：

(i) 網上保安

本公司會按照嚴格的保安及保密標準保障在互聯網提供給本公司的任何資料。但是，由於互聯網的急速發展，同一時間亦帶來必須留意及預防的新風險，因此本公司仍無法保證任何互聯網上的傳輸有百分之百的安全。客戶明確同意使用網絡服務所存在的風險及如有損失將完全由客戶承擔。

(ii) 「曲奇」的使用

本公司網站採用「曲奇」來儲存瀏覽本公司網頁(包括客戶的瀏覽)的記錄。「曲奇」是從一個資訊網內的伺服器傳送小檔案至瀏覽網頁使用者的電腦硬碟內，使用者再次瀏覽該網站時更簡單快捷，並享受更個人化的網站功能，而網頁提供者亦能查閱曾瀏覽其網頁的使用者。

6. 查閱資料要求及改正資料要求

6.1 本公司的政策為按照條例的規定，依從及處理一切查閱資料及改正資料要求；及讓所有有關職員熟悉有關的規定，以協助各人士作出有關要求。

6.2 本公司或會在符合條例或由個人資料私隱專員公署頒布之指引的規定下，就查閱資料要求徵收費用或要求償還相關開支。本公司只可收取與依從查閱資料要求直接有關及必需之費用。倘若任何提出查閱資料要求的人士要求本公司提供按早前的查閱資料要求提供過的個人資料的額外副本，本公司或會收取費用以全數彌補因提供該額外副本而涉及的行政成本或其他成本的費用。

6.3 有關查閱及改正資料的要求，可向本公司所指定的個人資料保障組提出。

7. 個人資料的存檔

本公司將採取一切合理及實際可行步驟，確保不會保留個人資料超過必需的時間。一般而言，本公司會在業務關係終止後保存相關的個人資料1年或按照有關法律或法規所規定的期限保留個人資料。如本公司聘用(不論是在香港或香港以外聘用)資料處理者，以代本公司處理個人資料，本公司將採用合約規範方法或其他方法，以防止轉移予該資料處理者作處理的個人資料的保存時間超過該資料所需的時間。

8. 如對本聲明有任何疑問，請以書面經以下聯絡方法向本公司提出：

九龍長沙灣荔枝角道 777 號田氏企業中心 2007-11 室

個人資料保障組

電郵地址：sincerity@hkst.com

2013 年 10 月

本公司發出

Privacy Policy Statement

Hong Kong Overseas Studies Centre Ltd (“the Company”)

Privacy Policy Statement

1. INTRODUCTION

- 1.1 This Statement is adopted as the Privacy Policy Statement (this “Statement”) of “The Company”. The purpose of this Statement is to establish the policies and practices of the Company’s commitment to protect the privacy of personal data and to act in compliance with the provisions of the Personal Data (Privacy) Ordinance (the “Ordinance”), Data Protection Principles and relevant guidelines issued by the Company.
- 1.2 To ensure compliance with the Ordinance, internal guidelines on protection of personal data are established and updated from time to time for reference and use by the staff of the Company.
- 1.3 The Company retains the right to change this Statement.

2. KINDS OF PERSONAL DATA HELD BY THE COMPANY

There are two broad categories of personal data held in the Company. They are personal data related to customers and employees of the Company.

3. PURPOSES THE PERSONAL DATA ARE HELD

- 3.1 It may be necessary for customers to supply the Company from time to time with data in connection with their request for the products or services of the Company or their enquiry thereof, or in the ordinary course of operation of business of the Company. Failure by customers to supply such data may result in the Company being unable to process transaction, establish or continue business relationship, or provide other services.
- 3.2 The purposes for which data relating to customers or potential customers may be used are as follows:
 - (i) Handling enquiries or processing requests for our products or services including reservations for our

products or services;

- (ii) supplying the products or services of the Company including reservations for our products or services and handling other requests made by customers in relation to the products and services of the Company, including but not limited to the requests for addition, alteration or deletion of products or services, setting up of direct debit facilities, complaint and reinstatement of contract;
- (iii) performing functions and attending activities incidental to the provision of the products or services of the Company such as identity verification, data matching and matters in relation thereto;
- (iv) exercising the Company's rights in connection with the provision of the products or services of the Company to customers from time to time, for example: to request the payment from customers;
- (v) designing products or services with a view to enhancing the Company's quality of service;
- (vi) preparing statistics and conducting research;
- (vii) marketing the following products, services or other subject matters (after obtaining the relevant consent including an indication of no objection of the data subject, save in the relevant circumstances as exempted under the Ordinance):
 - (a) travel information, overseas studies, study tours, ISIC Card, insurance and related services and products;
 - (b) reward, loyalty or privileges programs for customers and related services or products; and
 - (c) services and products offered by the co-branding partners of the Company (the names of such co-branding partners can be found in the application form(s) and/or promotional material for the relevant

services and products, as the case may be);

(Please see further details on how does the Company use personal data in direct marketing in paragraph (4) of the Company's Personal Information Collection Statement ("PICS"). Any data subject who does not wish the Company to use his/her personal data in direct marketing may contact the Company's Corporate Data Protection Officer according to the information provided in paragraph 8 of this Statement.)

- (viii) complying with the obligations, requirements and/or arrangements for disclosing and using data that bind on or apply to the Company or that it is expected to comply according to:
 - (a) any law binding or applying to it within or outside the Hong Kong Special Administrative Region ("Hong Kong") existing currently and in the future;
 - (b) any guidelines or guidance given or issued by any legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations of third party service providers within or outside Hong Kong existing currently and in the future; or
 - (c) any present or future contractual or other commitment with local or foreign legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations of third party service providers that is assumed by or imposed on the Company by reason of its financial, commercial, business or other interests or activities in or related to the jurisdiction of the relevant local or foreign legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations;

- (ix) enabling an actual or proposed assignee, transferee, participant or sub-participant of the Company's rights or business to evaluate the transaction intended to be the subject of the assignment, transfer, participation or sub-participation; and
- (x) any other purposes relating to the purposes listed above.

3.3 The purposes for which data relating to employees and potential employees may be used are as follows:

- (i) processing employment applications;
- (ii) determining and reviewing salaries, bonus and other benefits;
- (iii) consideration for promotion, training, secondment or transfer;
- (iv) consideration of staff benefits and eligibility for staff benefits and relevant management;
- (v) providing employee references;
- (vi) assisting employees in their applications to the statutory authorities or relevant organization for licences directly related to or associated with the employment;
- (vii) monitoring compliance with internal rules of the Company;
- (viii) according to any applicable law or any guidelines or guidance within or outside Hong Kong and existing currently and in the future binding on or applying to the Company or with which it is expected to comply, or any present or future contractual or other commitment with local or foreign legal or other authorities or relevant self-regulatory or industry bodies or associations,.
- (ix) any other purposes relating to the purpose listed above.

4. SECURITY OF PERSONAL DATA

It is the policy of the Company to ensure an appropriate level of protection for personal data in order to prevent unauthorised or accidental access, processing, erasure or other use of that data, commensurate with the sensitivity of the data and the harm that would be caused by occurrence of any of the aforesaid events. It is the practice of the Company to achieve appropriate levels of security protection by restricting physical access to data by providing secure storage facilities, and incorporating security measures into equipment in which data is held. Measures are taken to ensure the integrity, prudence, and competence of persons having access to personal data. Data is only transmitted by secure means to prevent unauthorised or accidental access. If the Company engages a data processor (whether within or outside Hong Kong) to process personal data on the Company's behalf, the Company will adopt contractual or other means to prevent unauthorised or accidental access, processing, erasure, loss or use of the data transferred to the data processor for processing.

5. COLLECTION OF PERSONAL DATA BY INTERNET

5.1 In relation to the collection of personal data by internet, the following practices are adopted:

(i) Online Security

The Company will follow strict standards of security and confidentiality to protect any information provided to the Company by internet. However, due to the rapid development of internet technology, there may be new risk in security through the use of internet which shall receive attention and shall be prevented contemporaneously. Hence, the Company still cannot render a guarantee that transmission through internet is absolutely safe. Customers expressly agrees to be responsible for the potential risk in security with the use of internet and any damages as a result thereof.

(ii) Cookies

The website of the Company has a record through Cookies of the visits (including visits by customers) to the website. Cookies are small pieces of data transmitted from a web server to a web browser. Cookie data is stored on a local hard drive. This is useful for web browser to easily come back to the website and enjoy websites to his/her preference. For Web server, it may read back the cookie data about the visit by a web browser.

6. DATA ACCESS REQUESTS AND DATA CORRECTION REQUESTS

6.1 It is the policy of the Company to process all data access and data correction requests in accordance with the provisions of the Ordinance and to ensure the staff concerned to be familiar with the relevant requirements so as to assist individuals in making such requests.

6.2 The Company may, subject to the Ordinance and the guidelines issued by the Office of the Privacy Commissioner for Personal Data, impose a fee or reimbursement for complying with a data access request ("DAR"). The Company is only allowed to charge a DAR requestor for the costs which are directly related to and necessary for complying with a DAR. If a person making a DAR requires an additional copy of the personal data that the Company has previously supplied pursuant to an earlier DAR, the Company may charge a fee to cover the full administrative and other costs incurred in supplying that additional copy.

6.3 Data access and data correction requests may be addressed to the Corporate Data Protection Team of the Company as specifically advised.

7. RETENTION OF PERSONAL DATA

The Company will take reasonable and practicable steps to ensure that personal data will not be kept longer than necessary. In general the Company shall usually hold the related personal data for a period of 1

year after termination of the business relationship or such period as prescribed by applicable laws and regulations. If the Company engages a data processor (whether within or outside Hong Kong) to process personal data on the Company's behalf, the Company will adopt contractual or other means to prevent any personal data transferred to the data processor from being kept longer than is necessary for processing of the data.

8. Should you have any question on this Statement, please in writing to the Corporate Data Protection Team of the Company at the following address or e-mail address:

The Corporate Data Protection Team

Hong Kong Student Travel Ltd

Room 2007-11 ,

Tins Enterprises Centre,

777 Lai Chi Kok Road,

Cheung Sha Wan, Kowloon,

Hong Kong

e-mail address : sincerity@hkst.com

October 2013

Issued by the Company