

## **Personal Data Protection Policy and Practices (“the Policy”)**

Bolttech Device Protection Hong Kong Limited (“**the Company**”) is committed to implementation and compliance with the provisions of the Personal Data (Privacy) Ordinance (“**the Ordinance**”). In this context the Corporate Data Protection Officer is responsible for coordinating and overseeing compliance with the Ordinance and the upholding of the Data Protection Principles set out in the Ordinance.

This Policy applies to all products and services provided by the Company and sets out how the Company may collect, use and disclose your personal data.

### Personal Information Collection Statement (“**PICS**”)

1. From time to time, it is necessary for you to supply the Company or agents and representatives acting on its behalf with personal data and particulars in connection with our services and products. Failure to provide the necessary information and particulars may result in the Company being unable to provide or continue to provide these services and products to you.
2. The Company may also generate and compile additional personal data using the information and particulars provided by you. All personal data collected, generated and compiled by the Company about you from time to time is collectively referred to in the PICS as “**Your Personal Data**”.
3. “Your Personal Data” will also include personal data relating to any other individuals in relation to which you have provided information. If you provide personal data on behalf of any person you confirm that you are either their parent or guardian or you have obtained that person's consent to provide that personal data for use by the Company for the purposes set out in the PICS.
4. As detailed in the PICS, Your Personal Data may also be processed by the Company's subsidiaries, holding companies, associated or affiliated companies and companies controlled by or under common control with the Company (collectively, “**the Group**”). 5. The purposes for which Your Personal Data may be used are as follows:
  - (i) providing our services and products to you, including administering, maintaining, managing and operating such services and products;
  - (ii) processing, assessing and determining any applications or requests made by you in connection with our services or products;
  - (iii) development of services related to technology devices and helping you use them better;
  - (iv) development of insurance and other financial services and products by other members of the Group;

- (v) developing and maintaining credit and risk related models;
  - (vi) processing payment instructions;
  - (vii) determining any amounts owing to or from you, and collecting and recovering any amount owing from you;
  - (viii) exercising any rights that the Company may have in connection with our services and/or products;
  - (ix) carrying out and/or verifying any eligibility, credit and/or identity checks in connection with our services and products or those of other members of the Group;
  - (x) any purposes in connection with any claims made by or against or otherwise involving you in respect of any of our services or products, including, making, defending, analysing, investigating, processing, assessing, determining, responding to, resolving or settling such claims;
  - (xi) carrying out suitability or needs assessments in respect of insurance or other products offered by members of the Group;
  - (xii) meeting disclosure obligations and other requirements imposed by or for the purposes of any laws, rules, regulations, codes of practice or guidelines (whether applicable in or outside Hong Kong) binding on the Company or any other member of the Group, including making disclosure to any legal, regulatory, governmental, tax, law enforcement or other authorities (including for compliance with sanctions laws, the prevention or detection of money laundering, terrorist financing or other unlawful activities) or to any self-regulatory or industry bodies such as federations or associations of insurers;
  - (xiii) for statistical and data analytics undertaken by the Company or any member of the Group; and
  - (xiv) fulfilling any other purposes directly related to (i) to (xiii) above.
6. Your Personal Data will be kept confidential, but to facilitate the purposes set out in paragraph 5 above, the Company may transfer, disclose, grant access to or share Your Personal Data with the following:
- (i) other members of the Group;
  - (ii) any technicians, legal advisors and/or other professional advisors engaged in connection with the Company's business;
  - (iii) any agent, contractor or service provider providing administrative, courier, distribution, credit reference, debt collection, telecommunications, computer,

call centre, data processing, payment processing, printing, redemption, repair, warehousing or other services in connection with the Company's business; and/or

- (iv) any official, regulator, ministry, law enforcement agent or other person (whether within or outside Hong Kong) to whom the Company or another member of the Group is under an obligation or otherwise required or expected to make disclosures under the requirements of any law, rules, regulations, codes of practice or guidelines (whether applicable in or outside Hong Kong).
7. Your Personal Data may be transferred or disclosed to any assignee or transferee of all or any substantial part of the Company's business.

*Direct marketing*

8. The Company is only allowed to (i) use Your Personal Data in direct marketing; or (ii) provide Your Personal Data to another person or company for its use in direct marketing, if you provide your consent or do not object in writing.
9. In connection with direct marketing, the Company intends:
- (i) to use your name, contact details, services and products portfolio information, financial background and demographic data held by the Company from time to time in direct marketing in relation to the following classes of services and products offered by the Company, other members of the Group and/or our business partners ("**Business Partners**") from time to time:
    - a. technology device enhancement services and products;
    - b. insurance, wealth management, pensions, investments, brokering, financial advisory, credit and other financial services and products;
    - c. health-check and wellness services and products;
    - d. media, entertainment and telecommunications services;
    - e. reward, loyalty or privileges programmes and related services and products; and
    - f. donations and contributions for charitable and/or non-profit making purposes; and
  - (ii) to provide your name and contact details to any members of the Group and/or Business Partners for their use in direct marketing the classes of

services and products described in paragraph 9(i) above (including, in the case of Business Partners, for money or other commercial benefit).

10. **If you do NOT wish the Company to use Your Personal Data in direct marketing or provide Your Personal Data to other members of the Group and/or Business Partners for their use in direct marketing (as set out in paragraph 9 above) you may opt out on the Application Form for the Restart program or subsequently write to the Corporate Data Protection Officer of the Company at the address below, or call our call centre, to opt out from direct marketing at any time.**
  
11. To facilitate the purposes set out in paragraphs 5 and 9 above, the Company may transfer, disclose, grant access to or share certain of Your Personal Data with the parties set out in paragraphs 6 and 9(ii) and you acknowledge that those parties may be based outside Hong Kong and that Your Personal Data may be transferred to places where there may not be in place data protection laws which are substantially similar to, or serve the same purposes as, the Ordinance.
  
12. Under the Ordinance:
  - (i) you have the right to request access to Your Personal Data held by the Company and request correction of any of Your Personal Data which is incorrect; and
  - (ii) the Company has the right to charge you a reasonable fee for processing and complying with your data access request.
  
13. Requests for access to or correction of Your Personal Data should be made in writing to the Corporate Data Protection Officer of the Company at the address below.
  
14. The Company reserves the right, at any time effective upon notice to you, to add to, change, update or modify the PICS.

#### Accuracy of Personal Data

The Company will ensure the accuracy of all personal data collected and processed by the Company. Appropriate procedures are implemented so that all personal data is regularly checked and updated to ensure that it is reasonably accurate having regard to the purposes for which that data is used. If personal data is transferred to third parties, the Company will notify such third parties of any correction to be made.

#### Retention of Personal Data

No personal data is kept for longer than is necessary and the Company will comply with all statutory and regulatory requirements in the Hong Kong Special Administrative Region concerning the retention of personally identifiable information.

## Data Security

The Company will ensure an appropriate level of protection for personal data in order to prevent unauthorized access, processing or other use of that data, commensurate with the sensitivity of the data and the harm that would be caused by unauthorized access to that data. It is the practice of the Company to achieve appropriate levels of security by restricting physical access to data, 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 and prudent security measures are taken with regard to the transmission of data.

## Use of Cookies and Third Party Links

The Company's website may include hyperlinks to third party websites. The Company has no control over the content, accuracy, opinion expressed, and other links provided at these third party websites or how these third party websites deal with your personal data. You should visit these third party websites for details of their privacy policies in relation to their handling of your personal data.

The Company may use "cookies" to improve our internet service to you. Cookies are small data files that are automatically stored on your web browser in your computer that can be retrieved by the Company's website. Cookies enable the Company's website to remember you and your preferences when you visit the website and enable us to tailor the website to your needs. The information collected by cookies is anonymous visitor's personalised settings information and contains no name or address information or any information that will enable anyone to contact you via telephone, e-mail or any other means. No customer personal data is stored in cookies. However, you can disable cookies by changing the settings of your web browser.

In case of discrepancies between the English and Chinese versions of these Personal Data Protection Policy and Practices, the English version shall apply and prevail.

Further enquiries regarding the Company's Personal Data Protection Policy and Practices may be directed to:

The Corporate Data Protection Officer

Units 2501-06, 25/F, FWD Financial Centre, 308 Des Voeux Road Central, Hong Kong  
Telephone: 5803 2496

## 《個人資料保障政策及措施》（「本政策」）

Bolttech Device Protection Hong Kong Limited（「本公司」）承諾實行和遵守《個人資料

（私隱）條例》（「該條例」）的條文。就此而言，公司資料保障專員負責協調和監督該條例的遵守情況，以及該條例所列資料保障原則的秉持。

本政策適用於本公司提供的所有產品及服務，並列明本公司收集、使用和披露您個人資料的方式。

## 《個人資料收集聲明》（「PICS」）

1. 您必須不時向本公司或代其行事的代理及代表提供就著我方服務及產品的個人資料及詳情。如未能提供必需的資料及詳情，本公司或許不能向您提供或繼續提供此等服務及產品。
2. 本公司亦可使用您提供的資料及詳情，以製作和編纂額外的個人資料。本公司所不時收集、製作和編纂關於您的所有個人資料在 PICS 中統稱為「您的個人資料」。
3. 「您的個人資料」亦將包括有關您所提供資料的任何其他個別人士的個人資料。如您代表任何人士提供個人資料，即確認您是其家長或監護人，或您已獲其同意提供該個人資料以供本公司用於 PICS 中列明之目的。
4. 就如 PICS 所述，您的個人資料亦可能經本公司的附屬公司、控股公司、有聯繫公司或聯屬公司以及本公司所控制或共同控制的公司（統稱為「本集團」）處理。
5. 您的個人資料亦可能用作以下目的：
  - (i) 向您提供我方服務及產品，包括給予、維持、管理和操作該等服務及產品；
  - (ii) 處理、評估和決定您就著我方服務或產品提出的任何申請或要求；
  - (iii) 開發有關科技裝置的服務，並助您獲享更佳的使用體驗；
  - (iv) 發展本集團其他成員提供的保險以及其他金融服務和產品；
  - (v) 開發和維持信貸及風險相關模型；

- (vi) 處理付款指示；
  - (vii) 釐定向您欠付或您所欠付的任何款額，並收取和追回您所欠付的任何款額；
  - (viii) 行使本公司就著我方服務及／或產品而擁有的任何權利；
  - (ix) 就著我方或本集團其他成員的服務及產品進行和／或核實任何資格、信貸及／或身份檢查；
  - (x) 用於由或針對您所提出或以其他方式涉及您的任何申索的任何相關目的，包括提出、抗辯、分析、調查、處理、評估、決定、回應、解決或結束該等申索；
  - (xi) 就著本集團成員提供的保險或其他產品進行適合性或需要評估；
  - (xii) 履行對本公司或本集團任何其他成員公司具有約束力的或為任何法律、規則、規例、工作守則或指引（不論在香港境內或境外適用）之目的規定的披露義務及其他要求，包括向任何法定、監管、政府、稅務、執法或其他機構（包括為遵守制裁法律、防止或偵測洗黑錢、恐怖主義融資或其他非法活動）或向任何自我監管或行內組織（例如保險公司聯盟或協會）進行披露；
  - (xiii) 用於本公司或本集團任何成員進行的統計及數據分析；且
  - (xiv) 實現直接有關上述 (i) 至 (xiii) 的任何其他目的。
6. 您的個人資料將會被保密，但為促成以上第 5 段所列之目的，本公司可能向以下各方轉移、披露、授予訪問或分享您的個人資料：
- (i) 本集團的其他成員；
  - (ii) 就著本公司業務而聘用的任何技術人員、法律顧問及／或其他專業顧問；
  - (iii) 就著本公司業務提供管理、遞送、分配、信貸資料、債務追討、電訊、電腦、電話聯絡中心、資料處理、付款處理、列印、換領、維修、存倉或其他服務的任何代理、承包商或服務供應商；及／或

- (iv) 本公司或本集團的其他成員根據任何法律、規則、規例、行為守則或指引（不論在香港境內或境外適用）有義務或以其他方式必須或預期對之披露的任何官員、監管者、政府部門、執法機構或其他人士（不論在香港境內或境外）。
7. 您的個人資料可能轉移或披露予本公司業務整體或任何重大部分的任何承讓方或受讓方。直銷
8. 本公司只在您透過書面方式表示同意或不反對的情況下，才獲許 (i) 將您的個人資料用於直銷；或 (ii) 向其他人士或公司提供您的個人資料以供其用於直銷。
9. 就著直銷而言，本公司旨在：
- (i) 將本公司所不時持有的您的姓名、聯絡資料、服務及產品組合資料、財務背景及基本資料，用於不時直銷本公司、本集團其他成員及／或我方業務夥伴（「業務夥伴」）所提供的以下服務及產品類別：
- a. 科技裝置提升服務及產品；
  - b. 保險、財富管理、退休金、投資、經紀、財務諮詢、信貸以及其他金融服務和產品；
  - c. 健康檢查及保健服務及產品；
  - d. 媒體、娛樂及電訊服務；
  - e. 獎賞、忠誠或禮遇計劃以及相關產品及服務；以及 f. 作為慈善及／或非牟利用途的捐款及捐獻；且
- (ii) 將您的姓名及聯絡資料提供予本集團的任何成員及／或業務夥伴，以供其用於直銷以上第 9(i) 段所述的服務及產品類別（包括在提供予業務夥伴的情況下用於獲取金錢或其他商業利益）。
10. 若不希望本公司將您的個人資料用於直銷或將您的個人資料提供予本集團的其他成員及／或業務夥伴以供其用於直銷（如以上第 9 段所述），您可在重啟計劃申請表上拒



絕，或隨後以書面方式聯絡本公司的公司資料保障專員並將函件郵寄至下列地址，或致電我們的電話聯絡中心，以隨時拒絕直銷。

11. 為促成以上第 5 段及第 9 段所列的目的，本公司可能向第 6 段及第 9(ii) 段的各方轉移、披露、授予訪問或分享某些您的個人資料，而您確認該等各方可能位於香港境外，且您的個人資料的轉移目的地可能不設與該條例大致類似或滿足相同目的之資料保障法律。
12. 根據該條例：
  - (i) 您有權要求訪問本公司所持關於您的個人資料，並在您的個人資料有誤時要求更正；且
  - (ii) 為處理和遵行您的資料訪問要求，本公司有權向您收取合理費用。
13. 如欲要求訪問或更正您的個人資料，應以書面方式向公司資料保障專員提出，並將函件郵寄至以下地址。
14. 本公司保留隨時（一經通知隨即生效）對 PICS 新增、更改、更新或修訂內容的權利。

### 個人資料的準確性

本公司將確保本公司所收集和處理的所有個人資料之準確性。本公司已實施適當程序以定期檢查和更新所有個人資料，從而確保個人資料就著資料使用目的而言是為合理準確。若然個人資料已轉移予第三方，本公司將就須作出的任何更正通知該等第三方。

### 個人資料的留存

所有個人資料不會被留存超過所需期限，且本公司將遵守香港特別行政區就著個人身份識別資料留存所訂立的一切法定及監管要求。

### 資料安全性

本公司將確保與資料敏感度以及未經授權訪問資料所將導致的損害相稱的適當水平的個人資料保障措施，以防資料遭未經授權訪問、處理或作其他用途。本公司通過限制對資料的物理訪問，提供安全儲存設施，並將保安措施納入持有資料的設備，以達致適當的資料安全水

平。為確保訪問個人資料的人士正直、謹慎和稱職，已採取相應措施；另亦就著資料傳輸採取謹慎的保安措施。

### Cookies 及第三方連結的使用

本公司的網站可能載有第三方網站的超連結。本公司不能控制此等第三方網站的內容、準確性、所表達之意見以及提供的其他連結，亦無法控制此等第三方網站處理您的個人資料的方式。您應瀏覽此等第三方網站，以查閱其處理您的個人資料有關的私隱政策之詳情。

本公司可能使用“Cookies”以改善向您提供的互聯網服務。Cookies 是小型資料檔案，自動存於您電腦的網絡瀏覽器，並可由本公司網站擷取。透過 Cookies，本公司網站可在您瀏覽網站時記住您及您的偏好，我們亦可從而按照您的需要度身定制網站。Cookies 收集的資料是匿名的訪客個人化設定資料，不會載有姓名或地址資料或讓任何人士得以透過電話、電郵或任何其他方式聯絡您的任何資料。顧客個人資料概不存於 Cookies。然而，您可更改網絡瀏覽器設定來停用 Cookies。

一旦本《個人資料保障政策及措施》的英文及中文版本有所差異，須以英文版本為準。

如果對於本公司的《個人資料保障政策及措施》抱有其他疑問，可聯絡：公司資料保障專員

香港上環德輔道中 308 號富衛金融中心 2501-06 室 電話號碼：5803 2496