

私隱聲明

本私隱聲明概述我們如何收集、使用、管理和保護我們可能向閣下收集或所收集到有關閣下的個人資料（「個人資料」），並適用於其個人資料可能由香港電訊集團（「香港電訊」或「我們」，即為香港電訊有限公司*、其附屬公司、聯營公司及關聯公司）作為控制者或處理者經手的所有個人，包括但不限於 1010、csl、網上行寬頻、LiKE100、HKT 家居電話、eye、國際電話、Now TV、Now E、香港黃頁、ypTrade、ypShop、uHub plus、HKT Smart Living、HKT 延長保養服務、升·聲·星級來電、HKT Premier、HKT education、HKT Financial Services、HKT Merchant Services、拍住賞、HKT Flexi、PayLater@、HKT Advance、HKT Care、Club Care、Club Shopping、Club Like、Club Travel、Club Hope、Club SIM、香港電訊固網電話、香港電訊商業寬頻及 one communications 服務的客戶、The Club 及 INSPIRE 的會員及 My HKT 用戶。

保障閣下的私隱

我們竭力按照規定的標準處理閣下的資料，其中包括保障閣下的私隱及確保閣下個人資料的安全，以遵守（尤其是及在適用情況下）香港法例第 486 章《個人資料（私隱）條例》（「條例」），以及歐洲議會和歐盟理事會在 2016 年 4 月 27 日通過有關處理個人資料及有關資料自由流通的個人保障的第 2016/679 號歐盟規則（「GDPR」，個人資料保護規則）（如適用）。

為本私隱聲明列明之目的使用或提供閣下的個人資料前，我們可能會因法例規定須要索取閣下的書面同意。在此情況下，我們只會在取得閣下的同意後，才會開始按指定的方式使用閣下的個人資料。

閣下的個人資料

我們或會收集、使用及保留閣下各種個人資料。為了經營我們的業務（包括核實閣下的身份以偵查、預防及處理欺詐、保安或技術問題、登記、啟動及管理閣下在香港電訊的帳戶，以及我們的產品和服務的帳單和收費（統稱「服務」）及遵從任何適用之政府相關部門、法院、執法或有關當局或監管機構所發佈的法律、規定、指引、規則及／或要求，閣下可能需要提供包括但不限於下列的個人資料：

- a. 姓名、出生日期及閣下的身份證或其他法定證明文件、旅遊證明文件、學生證及／或駕駛執照所記載的其他詳情；
- b. 聯絡資料，包括閣下的姓名、地址、電話號碼、手提電話號碼及／或電郵地址；
- c. 閣下與第三方社交媒體平台經營商分享的個人資料（例如帳戶登入姓名、圖像、聯絡資料）；
- d. 付款資料，包括信用卡、扣帳卡和其他網上銀行資料；

- e. 與登記使用我們的服務相關的帳戶詳情或個人資料，包括相關的 PIN、用戶名稱或密碼、帳戶號碼及／或服務號碼；
- f. 裝置的具體資料，例如硬件模型、作業系統、版本、唯一識別碼、序號、設定配置以及軟件和流動網絡配置；
- g. 有關閣下如何使用我們的服務的資料，例如閣下的網絡使用情況、閣下如何使用我們的網絡，以及閣下使用我們的服務時的位置；
- h. 使我們能識別以核實閣下身份的資料，包括生物識別資料，例如閣下的指紋和聲紋；
- i. 健康和生物識別資料（可能在閣下使用我們的健康及保健相關的產品和服務時向我們提供）；
- j. 閣下的信用及服務記錄，使我們能評估閣下是否合資格使用我們的服務或處理閣下轉移服務或帳戶的要求；
- k. 適用的政府相關部門、法院、執法或有關當局或監管機構所要求使我們能遵守任何法律、規定、規則、判決或法庭命令（不論是在香港境內或境外）或與此有關的所有個人資料；及
- l. 香港電訊任何成員及／或其各自的承辦商、分包商、中介、代理商、商業夥伴或代表、經紀或承包商可能不時要求就提供服務而言為必需的任何其他個人資料。

在某些情況下，如法律有所規定，我們可能會徵求閣下同意我們處理下列類別的「**特別個人資料**」，使我們能進一步改善服務及／或為閣下提供更適切的類別的資料或內容：

- a. 年齡；
- b. 性別及種族；
- c. 婚姻狀況；
- d. 薪金水平及就業資料；
- e. 教育程度及專業資格；
- f. 嗜好及休閒活動；
- g. 閣下已申請的服務；及
- h. 家庭及家居統計資料。

閣下可選擇是否提供上述的特別個人資料。但當所需服務是個人化服務，或產品的提供是建基於閣下已提供一切所需個人資料，若閣下屆時未能提供所需的個人資料，可能會有礙我們向閣下提供該等特定服務。

閣下或須向我們提供其他人士的個人資料（例如我們於《流動通訊服務協議》中所定義的使用者）。在此情況下，我們或會要求閣下確認閣下會遵從條例第 VIA 部，並確認閣下已告知該等人士：個人資料的使用、披露及轉移（包括由閣下向我們提供的個人資料以及由我們向第三者提供的個人資料），以及我們可能向閣下披露該等人士的詳情（包括該等人士使用我們的服務、會員獎賞計劃和 My HKT 的詳情）；而閣下已獲得該等人士就該等使用、披露及轉移的授權及／或同意（或者有關授權及／或同意的適用範圍）。閣下亦應提醒該等人士可以聯絡我們以索取進一步資料（請參閱下述之「**聯絡方式**」）。

經閣下提供的個人資料，將會由香港電訊的一名或以上成員保留，並在符合有關情況或為本私隱聲明列明之目的或事先通知閣下的其他目的或（如有需要）在取得閣下的同意後，供該等成員的僱員及獲授權的第三方使用。

我們如何收集個人資料

我們會通過不同的方式收集個人資料，包括：

- a. 直接向閣下收集，例如閣下透過電話或電郵、出席我們的活動、填寫我們某項服務的申請表格或協議，或通過我們的網站、流動或電視應用程式或任何客戶服務熱線或網上聊天室提交閣下的個人資料，或當閣下聯絡我們提出查詢或要求時，或在日常商業事務中與我們保持聯繫期間，或當我們根據法規要求收集該等個人資料；
- b. 經閣下同意後向第三方，例如相關的公司、業務合作夥伴、或其他客戶或閣下的代表收集；
- c. 從公開資料來源收集；
- d. 根據我們內部有關閣下如何使用我們的服務的記錄中收集；
- e. 當閣下瀏覽我們的網站、流動或電視應用程式（請參閱下述「私隱資料」）；及／或
- f. 當閣下參與由我們或我們的代表舉行的調查或促銷活動。

私隱資料

為了更能滿足閣下的需要和喜好，我們的網頁伺服器會收集與閣下的網站、裝置或應用程式活動有關的個人資料。我們亦會收集伺服器使用量的不記名集體統計資料，使我們能更適當地回應我們網站及流動和電視應用程式用戶的行為模式。這類個人資料可包括但不限於：

- a. 瀏覽器類型、版本及用戶代理；
- b. 操作系統；
- c. IP（互聯網通訊協定）地址及／或網域名稱；
- d. 連接數據、網頁瀏覽及／或推薦連結的統計數據及／或；
- e. 裝置識別資料、位置及電話聯絡人；
- f. 已觀看或搜尋的影片；
- g. 已點擊的連結或圖像；
- h. 「曲奇」（cookies）及／或瀏覽器、應用程式或網頁伺服器的日誌記錄；及
- i. 裝置及軟件特性及／或配置。

我們的一些網站會在閣下的電腦或裝置內使用「曲奇」（cookies）或類似的追蹤工具，以便我們（例如）為閣下提供個人化的服務及／或於閣下瀏覽不同網頁及／或互聯網期間進行身份識別。此等個人資料可包括但不限於登入及確認資料，以及有關閣下的裝置及閣下在我們網站及流動和電視應用程式內的活動和喜好設定的個人資料。我們的網站在最初會設定為接受「曲奇」。閣下可以透過更改閣下網頁瀏覽器的設定選擇拒絕或刪除「曲奇」的歷史記錄；但是，閣下在更改有關設定後，可能無法如常使用我們網站及／或應用程式的某些功能。

我們如何使用閣下的個人資料

我們可能收集、保留及使用閣下的個人資料以作如下用途：

- a. 核實閣下的身份；
- b. 處理閣下選用我們的服務及會員獎賞計劃的申請；
- c. 根據條例進行核對程序；
- d. 核實閣下選用或參加我們的服務、遊戲及／或推廣或其他活動的資格；

- e. 提供或啟動閣下已申請的服務、會員獎賞計劃及 My HKT 及／或就有關服務或計劃進行續期；
- f. 為閣下提供獎賞、推廣優惠、更新、優惠及活動邀請；
- g. 向閣下宣傳及促銷我們的服務；
- h. 遵照香港法例第 615 章《打擊洗錢及恐怖分子資金籌集條例》進行信用審查及偵查欺詐活動，以及其他合規目的；
- i. 進行研究或分析，以改進和完善我們為閣下所提供的服務及／或會員獎賞計劃；
- j. 為業務營運及／或商業規劃進行調查及促銷、宣傳及行為評分；
- k. 進行市場和產品分析作統計或精算報告（包含與任何已識別或可識別的個人無關的整體數據）；
- l. 執行我們的合約權利；
- m. 就我們向閣下提供服務處理付款指示、直接扣帳安排及／或賒帳安排；
- n. 維持和開發我們的業務系統和基礎設施，包括測試及更新該等系統；
- o. 維持、提升和開發我們的產品及服務；
- p. 開發理財服務及產品；
- q. 評估閣下的財務需要以及由或針對閣下提出的保險索償，以及處理與閣下有關係的索償（包括但不限於提出、辯護、分析、調查、處理、評估、釐定、回應或解決該等索償或進行和解）；
- r. 就我們與其他電訊服務營辦商的互連安排遵守我們的電訊牌照責任以及相關的行業守則；
- s. 就我們向閣下提供服務及／或會員獎賞計劃，遵守適用的政府相關部門、法院、執法或監管或調查當局所規定的香港境內或海外適用法律，包括協助預防或偵查犯罪或潛在犯罪活動；及
- t. 發佈我們的刊物及研究資料，以及我們的商業合作夥伴及對手方的刊物及研究資料。

我們使用閣下的個人資料（包括我們如何披露閣下的個人資料）的法律依據

妥善地執行服務關乎我們的合法利益。此外，為履行閣下所要求的服務，我們可能有必要使用閣下的個人資料。在適用法律和規例准許的範圍內，我們或會將您的個人資料披露給香港電訊以外

的機構或人士（可能位於香港境內或海外）（統稱「機構」），從而提供閣下所要求的服務。向該等機構披露閣下個人資料之目的，只會嚴格限制於使我們能向閣下提供我們的服務。

在上述的某些情況中，我們或需根據法律規定徵求閣下同意我們使用閣下的特別個人資料。

下列機構為我們的業務和運作提供支持服務，包括但不限於：

- a. 客戶查詢；
- b. 快遞、送貨、物流及倉庫服務；
- c. 郵件操作；
- d. 帳單和欠款收取；
- e. 資訊科技服務；
- f. 安裝、保養及維修服務；
- g. 市場促銷、廣告及電話促銷服務；
- h. 市場調查；
- i. 客戶使用量及行為分析；
- j. 程序管理；
- k. 售後服務；
- l. 調查；
- m. 網站使用量分析；及
- n. 雲端儲存服務。

我們會採取必要的措施，以確保該等機構是受有關保障閣下個人資料的保密及私隱責任的約束，且該等機構僅就他們受聘執行的服務之目的，而不能為自用或其他目的（包括直接促銷）使用閣下的個人資料。

此外，我們可能會向下列各方披露閣下的個人資料：

- a. 閣下的授權代表及／或法律顧問（在閣下要求下）；

- b. 下述為提供行政、付款、收款、商業、法律及/或業務支持的機構：
- i. 信貸報告和欺詐調查機構；
 - ii. 金融機構、付款卡或信用卡發卡公司、信貸機構、信貸資料公司、債務代收或證券代理；
 - iii. 電訊網絡營運商；
 - iv. 我們的附屬成員、海外辦事處、委托人、受讓方及代表；
 - v. 我們的專業顧問，包括我們的會計師、核數師、律師及保險人；
- c. 銀行、酒店、保險公司、保險經紀、承保人、帳單代理及其他商業夥伴，為會員獎賞計劃作兌換用途，包括但不限於協助會員登記參與有關的活動；
- d. 政府及監管機構及其他法律規定或授權的機構；
- e. 管理我們業務及企業策略的機構，包括為該等目的參與轉讓或出售我們全部或部份的資產或業務（包括帳戶和應收帳款）以及參與管理我們的企業風險和資金籌集功能（例如證券化）的機構；
- f. 有關我們的全部或部份運營業務的任何潛在或實際參與者、委托人或受讓方；及/或
- g. 慈善或非牟利機構。

直接促銷（如適用）

我們在遵守適用法律、規則、規例和牌照規定的情況下，或會使用閣下的資料（包括但不限於姓名、聯絡資料、電話號碼、住宅/辦公室地址、電郵地址及閣下已選購的產品的資料），以便我們（包括電訊盈科有限公司及其各子公司、附屬成員及關聯公司）及我們各自的經銷商、供應商、授權人、提供商及/或業務合作夥伴（統稱「服務供應商」）為閣下提供直接促銷資料（我們可能會、也可能不會就此獲得報酬），包括向閣下發出與我們及/或服務供應商提供的服務有關的禮品、折扣、尊享優惠、優惠和推廣的通知及/或最新情報，包括但不限於：電視、電訊、OTT 服務、資料服務、流動話音、短訊及數據通訊、IDD/國際漫遊、互聯網連接、雲端服務、手機付款、娛樂、秘書服務、個人助理服務和資訊服務（例如天氣、財經和新聞資訊）、裝置配件、流動應用程式和軟件、電腦周邊產品、配件和軟件（包括筆記型電腦、手提電話、流動裝置及配件、鍵盤、防禦裝置及流動應用程式）、獎賞、忠誠或尊貴計劃、生活方式、社交活動、旅遊、銀行、酒精及煙草、運動、音樂、遊戲、交通、家居產品、餐飲、金融、保險、財富管理服務和產品、退休金、投資、經紀服務、理財顧問、信貸及其他理財服務和產品、博彩、教育、健康及保健、美容產品和服務、時尚及配飾、電子產品、社交網絡、科技、電子商務、數碼資產及相關產品和

服務、物流、零售、家居佈置、媒體及高端消費類產品和服務。該等促銷可透過多種方式進行（包括以郵件、於帳單內夾寄／簡訊、電郵、數字短訊、多媒體短訊、即時消息、應用程式推送通知、針對性的電視消息、eye 設備上發佈消息、透過電話或社交媒體或網站顯示廣告或其他方式）。

在將你的個人資料用作本私穩聲明所述的目的之前，我們可能會因法例規定須要索取閣下的書面同意。在此情況下，我們只會在取得閣下書面同意後，才開始使用及提供你的個人資料作任何推廣或市場用途。

我們尊重所有停止使用個人資料作直接促銷的要求，你可選擇拒絕接收直接促銷資料及／或有關服務、會員獎賞計劃及／或 My HKT 的通訊。與此同時，若你有意重新收取該等資料（重收促銷資料要求只適用於以往曾經拒絕接收該等資料及／或有關服務、會員獎賞計劃及／或 My HKT 的通訊的客戶），你可連同註冊名字、帳戶號碼、註冊電話號碼或登入帳戶名稱（如適用）等郵寄通知我們的集團資料保護主任，告知我們你願意收取這些資料。

轉移個人資料至香港以外地方

本公司在有需要時會審慎地將你的個人資料轉移至香港特別行政區以外的地方以達到不同目的，例如預防、偵查或調查犯罪行為、或以達到儲存、處理此等資料及其他收集資料之目的。如本公司將你的個人資料轉移至香港特別行政區以外的地方，該轉移會遵守條例及 GDPR（如適用）的現行之規定。

我們重視閣下個人資料的安全性

我們盡力確保所有我們客戶的個人資料均儲存於可靠安全的地方。該等個人資料只有經我們授權的僱員或在本私穩聲明中提及的其他機構方可查閱。

若我們將你的個人資料轉交予第三方機構處理，我們會盡量確保該等機構有適當的安全措施來保護你的個人資料的安全性並遵守有關個人資料保護的適用原則。收到你的個人資料的一方可能會在海外處理這些個人資料。若閣下欲瞭解本公司爲了確保你的個人資料得到充分保護而使用的安全措施，閣下可以與本公司聯絡，索取更多資料。

個人資料的保存

本公司將會根據內部政策，持有你的個人資料。本公司的政策符合條例及 GDPR（如適用），及包括以下宗旨：

- a. 個人資料會保存至達到與收集上述資料之原來目的，或直接有關之目的為止；除非上述個人資料可根據任何適用法律、法規或合約規定須予以保存；及

- b. 基於上述標準及本公司的內部程序，個人資料會在本公司的電子、人手及其他儲存系統中被清除。

鏈結

我們網站（包括但不限於 www.hkt.com, <https://www.hktchina.com>, www.1010.com.hk, www.hkcs.com, www.netvigator.com, www.like100.hk, www.hkt-eye.com, www.nowtv.now.com, www.nowe.com, www.yip.com.hk, www.yptrade.com, www.ypshop.com.hk, www.uhub.com, <https://smartliving.hkt.com>, www.hkt-starhomecall.com, www.hktpremier.com, www.hkteducation.com, www.hktfinancialservices.com, www.hktmerchantservices.com, www.tapngo.com.hk, www.hktflexi.com, <https://www.pay-later.com.hk>, www.hktcare.com, <https://clubcare.theclub.com.hk>, <https://shop.theclub.com.hk>, www.clublike.com.hk, www.clubtravel.com.hk, <https://trip.clubtravel.com.hk>, www.clubhope.com.hk, www.clubsim.com.hk, www.theclub.com.hk, www.cs.hkt.com, www.biznetvigator.com 及 <https://www.hkt-enterprise.com>）及流動和電視應用程式（如有）或包含可通往其他地址、網頁及由第三者營運的流動和電視應用程式的鏈接。我們無法控制該等被鏈接網站、網頁及流動和電視應用程式的內容或該等網站、網頁及流動和電視應用程式營運商處理閣下個人資料的方式，並概不對該等第三方網站、網頁或流動和電視應用程式的內容負責。閣下應審閱該第三者網站、網頁及流動和電視應用程式上的私隱政策，以瞭解該等第三者可能使用閣下個人資料的方式。

閣下查閱、更正及刪除個人資料的權利

我們採取一切合理的預防措施，以確保我們收集、使用及披露的個人資料是準確、完整和最新的。然而，個人資料的準確性在很大程度上取決於你提供的個人資料。你有權要求查閱和更正你的個人資料，我們建議你：

- a. 當閣下發現個人資料記錄有任何錯誤時請通知我們；及
- b. 請通知我們若閣下的個人資料有所改變或更新。

若閣下希望查閱或更正我們持有的閣下的任何個人資料，或要求我們刪除（僅在有相關法律的要求下適用）任何不再因為我們提供的服務而需要保存的資料，你可以按照下述之「聯絡方式」與我們聯絡。

如閣下為 **My HKT** 之用戶，你可登入 **My HKT** 戶口以查閱和更正你的個人資料，行使閣下的查閱及修正權利。如閣下不是 **My HKT** 之用戶，你可以按照下述之「聯絡方式」致函本公司的集團資料保護主任。

我們可因應閣下的要求就所查閱的資料收取行政費。

閣下可以拒絕與我們分享你的個人資料及／或撤回你作出的任何同意，在這種情況下，我們可能無法向你提供我們的某些服務。

除非適用的法律允許本公司持有或處理你的個人資料，否則，閣下可以隨時以合法的理由反對我們持有或處理你的個人資料。

聯絡方式

任何有關香港電訊是否遵從條例及 GDPR（如適用）的責任查詢及任何查閱、更改或刪除個人資料的請求，請以書面形式致函：

香港電訊有限公司
集團資料保障主任

地址：香港郵政總局信箱 9896 號

或

電郵：privacy@pccw.com

如對有關個人資料之處理有任何疑問，請與我們聯絡，我們會盡力解決閣下的疑問。

本私隱聲明或曾經不時修訂，所有個人資料之處理將受制於本私隱聲明的最新版本（詳見 www.hkt.com/legal/privacy_c.html）。若中、英文版本有歧義之處，概以英文版本為準。

Privacy Statement

This Privacy Statement sets out how we collect, use, manage and protect the personal data or information (“Data”) that we may collect from or about you. It applies to all individuals whose Data may be handled, whether as controller or processor, by the HKT Group (“HKT”, “we”, “us” or “our”, being HKT Limited, its subsidiaries, affiliates and associated companies), including without limitation, customers of 1010, csl., NETVIGATOR, LiKE100, HKT Home Phone, eye, International Telephone, Now TV, Now E Hong Kong Yellow Pages, ypTrade, ypShop, uHub plus, HKT Smart Living, HKT Smart Warranty, Star Home Call, HKT Premier, HKT education, HKT Financial Services, HKT Merchant Services, Tap & Go, HKT Flexi, PayLater@, HKT Advance, HKT Care, Club Care, Club Shopping, Club Like, Club Travel, Club Hope, Club SIM, HKT Fixed Line, HKT Business Broadband, one communications services, members of The Club and INSPIRE and users of My HKT.

Protecting Your Privacy

We are committed to processing your Data in accordance with the required standards. This includes protecting your privacy and ensuring the security of your Data in compliance with, in particular and where applicable, the requirements of the Personal Data (Privacy) Ordinance (Chapter 486 of the Laws of Hong Kong) (the “Ordinance”), Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (the “GDPR”) where applicable.

Before using and providing your Data for the purposes as set out in this Privacy Statement, we may be required by law to obtain your written consent, and in such cases, only after having obtained such written consent, may we use your Data in the manner as specified.

Your Data

We may collect, use and hold a range of different Data about you. For the purposes of carrying on our business (including the verification of your identity to detect, prevent and address fraud, security or technical issues, the registration, activation and management of your account with us, and the billing and charging of our products and services (collectively, “Service(s)”) and complying with laws, rules, guidelines, regulations and/or requests issued by applicable government authorities, courts, law enforcement or other authorities or regulatory bodies, you may be requested to provide Data such as, but not limited to:

- a. the name, date of birth and other details documented on your Hong Kong Identity Card or other legal identity card, travel document, student card and/or driver’s licence;

- b. contact details including name, address, phone number, mobile telephone number and/or email address;
- c. Data that you have shared with third party social media platform operators (e.g. account login name, profile picture, contact details);
- d. payment details including credit card, debit card and other electronic banking Data;
- e. account details or Data relating to Services registered with us including the relevant PIN, username or password, account numbers and/or service numbers;
- f. device specific information such as hardware model, operating system, version, unique device identifier, serial numbers, setting configurations and software and mobile network configuration;
- g. information about how you use our Services such as your network usage, how you use our network, and your location when you are using our Services;
- h. information that allows us to identify you for verification purpose including biometric information like your fingerprints and voice pattern;
- i. health and biometric information (which could be provided to us when you use our health and wellbeing related services);
- j. your credit and service history to enable us to assess your eligibility to our offers of Services or to accommodate your request for transfer of Services or your account with us;
- k. all Data requested by applicable government authorities, courts, law enforcement or other authorities or regulatory bodies to enable us to comply with or in connection with any law, rule, regulation, judgment or court order (whether within or outside of Hong Kong); and
- l. any other Data as may be required by any members of HKT and/or their respective contractors, sub-contractors, intermediaries, agents, business partners or representatives, brokers, underwriters from time to time and which is necessary for the provision of the Services.

In some instances, where required by law to do so, we may seek your consent to process the following types of “Special Data” to us so that we may further improve our Services and/or better tailor the type of information or content that we present to you:

- a. age;
- b. gender and ethnicity;
- c. marital status;
- d. salary range and employment details;
- e. education and profession;

- f. hobbies and leisure activities;
- g. the Services that you have subscribed for; and
- h. family and household demographics.

Provision of the Special Data mentioned immediately above is optional although, where the requested Service is a personalised Service or provision of a product is dependent upon your provision of all requested Data, failure to provide the requested Data may prevent us from providing those particular Services to you.

Occasionally, you may need to provide Data about other individuals (e.g. “Users” as defined in our Mobile Service Agreement) to us. If so, we may require you to confirm your compliance with Part VIA of the Ordinance including confirming that you have informed those individuals of the use, disclosure and transfer of Data from you to us and from us to third parties and possible disclosure of the individual’s details (including their usage of our Services, loyalty programs and My HKT) by us to you; and that you have obtained those individuals’ authorisation and/or consent to such use, disclosure and transfer (or the extent to which such authorisation and/or consent was obtained). You should also advise them that we can be contacted for further information at the details stated under the “How to contact us” section below.

Data supplied by you will be held by one or more members of HKT, and will be accessible by employees of such member(s) and authorised third parties (consistent with the situations or for the purposes set out in this Privacy Statement) or as otherwise indicated by prior notice to you or, where required, by obtaining your consent.

How We Collect Data

We collect Data in a number of ways, including from:

- a. you directly, for example, when you provide Data by phone or via email, attend our functions, complete an application form or agreement for one of our Services, or when you submit your Data through our websites, mobile or TV apps, or over any customer service hotlines or online chat sessions; or when you contact us with a query or request; or during the ordinary course of the continuation of our business relationship with you; or when we are legally required to do so;
- b. third parties such as related entities, business partners, or other customers, or your representatives with appropriate consent from you;
- c. publicly available sources;
- d. our own records of how you use our Services;
- e. your visits on our websites, or mobile or TV apps (see “Privacy Data” section below); and/or

- f. your participation in surveys or marketing promotions organised by us or on our behalf.

Privacy Data

To better serve your needs and preferences, our web servers may collect Data relating to your website, device or app activity. We may also collect aggregated, anonymous, statistical data on the server's usage so that we may better cater to the behaviour of users of our websites and mobile and TV apps. This type of Data may include, but is not limited to:

- a. browser type, version and user agent;
- b. operating system;
- c. IP (Internet Protocol) address and/or domain name;
- d. connection data, statistics on page views and/or referral URLs;
- e. device ID, location and phone contacts;
- f. videos watched or searched for;
- g. links or images clicked on;
- h. cookies and/or browser, app or web server log data; and
- i. device and software characteristics and/or configuration.

Some of our websites use cookies or similar tracking tools on your machine or device in order for us to, for example, personalise your user experience and/or maintain your identity across multiple webpages and/or Internet sessions. This Data may include, but is not limited to, relevant login and authentication details as well as Data relating to your activities and the preference configurations on your device and across our websites and mobile and TV apps. Our websites are initially set up to accept cookies. You can opt out of or delete historical cookies by changing the settings on your web browsers; however, if you do so, you may find that certain features on our website and/or our app do not work properly.

How We Use Your Data

We may collect, retain and use your Data for the following purposes:

- a. to verify your identity;
- b. to process your application to subscribe to our Services and loyalty programs;
- c. to carry out matching procedures, as defined under the Ordinance;
- d. to verify your eligibility to our offers of Services, games and/or promotions or other events;

- e. to provide, activate and/or renew Services, loyalty programs and My HKT that you may have subscribed for;
- f. to provide you with rewards, promotional benefits, updates, offers and invitation to events;
- g. to promote and market our Services to you;
- h. to conduct credit checks and detect fraudulent activities in compliance with the Anti-Money Laundering and Counter-Terrorist Financing (Financial Institutions) Ordinance (Cap. 615) and in relation to other compliance purposes;
- i. to perform research or analyses so that we may improve and optimize the Services and/or loyalty programs that can be made available to you;
- j. to conduct surveys and marketing, promotional, behavioural scoring for business operations and/or planning purposes;
- k. to carry out market and product analyses in order to generate statistical or actuarial reports (containing aggregated data that does not relate to any identified or identifiable individual);
- l. to enforce our contractual rights;
- m. to process any payment instructions, direct debit facilities and/or credit facilities in relation to our supply of Services to you;
- n. to maintain and develop our business systems and infrastructure, including testing and upgrading of these systems;
- o. to maintain, enhance and develop our products and service offerings;
- p. to develop financial services and products;
- q. to evaluate your financial needs and insurance claims made by or against you, and to process claims involving you (including but not limited to making, defending, analysing, investigating, processing, assessing, determining, responding to, resolving or settling such claims);
- r. to comply with our telecommunications licence obligations in respect of interconnection arrangements with other telecommunications operators and related industry practices;
- s. to comply with applicable laws in or outside Hong Kong as may be required by applicable government authorities, courts, law enforcement, or regulatory or investigation bodies, in relation to the supply of Services and/or loyalty programs to you, including to assist in the prevention, detection of crime or possible criminal activities; and
- t. to distribute our publications and research materials as well as those of our business partners and counterparties.

Our Legal Basis for Using Your Data Including How We Disclose Your Data

We have a legitimate interest in properly administering the Services. In addition, our use of your personal data may be necessary for the performance of the Services that you have requested. In order to provide the Services that you have requested, we may, to the extent permissible under applicable laws and regulations, disclose your Data to organizations or parties outside of HKT (which may be within or outside of Hong Kong) (collectively, "Organizations"). Your Data is disclosed to these Organizations for the strict purpose of enabling us to supply our Services to you.

In some circumstances as mentioned above, we may need to ask for your consent to use your Special Data where required by law to do so.

These Organizations Provide Support Services to Our Businesses and Operations including without Limitation:

- a. customer enquiries;
- b. courier, delivery, logistic and warehouse services;
- c. mailing operations;
- d. billing and debt-recovery functions;
- e. information technology services;
- f. installation, maintenance and repair services;
- g. marketing, advertising and telemarketing services;
- h. market research;
- i. customer usage and behavioural analysis;
- j. process management;
- k. after sale services;
- l. surveys;
- m. website usage analysis; and
- n. cloud storage services.

We take the required steps to ensure that these Organisations are bound by appropriate confidentiality and privacy obligations in relation to the protection of your Data and that they use your Data for the sole purpose of carrying out the services for which they have been engaged, and not for their own or other purposes (including direct marketing).

In Addition, We May Disclose Your Data:

- a. to your authorised representatives and/or your legal advisers when requested by you to do so;
- b. for the purposes of providing administrative, payment, collection, business, legal and/or operational support, to the following parties:
 - i. credit-reporting and fraud-checking agencies;
 - ii. to financial institutions, charge or credit card issuing companies, credit providers, credit bureau, collection agencies or security agencies;
 - iii. telecommunications network operators;
 - iv. our affiliates, overseas offices, assignees, transferees and representatives;
 - v. our professional advisers, including our accountants, auditors, lawyers and insurers;
- c. to banks, hotels, insurance companies, insurance brokers, underwriters, billing agents and various business partners for reward redemption purposes and benefits applicable to members of our loyalty programs, including without limitation for the purpose of registering members for loyalty program related events;
- d. to government and regulatory authorities and other organisations, as required or authorised by law;
- e. to organisations who manage our business and corporate strategies, including those involved in a transfer or 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 (e.g. securitisation);
- f. to any proposed or actual participant, assignee or transferee of all or any part of the relevant member of our operations or business; and/or
- g. to charities or non-profit organisations.

Direct Marketing (If Applicable)

We may, in compliance with applicable laws, rules, regulations and licence requirements, use your Data (including without limitation name, contact information, phone number, residential/office address and email address and information about the Services you have purchased), for us (including PCCW Limited and its respective subsidiaries, affiliates and associated companies) and our respective dealers, suppliers, licensors, providers and/or business partners (collectively, "Service Providers") to provide you with direct marketing content (pursuant to which we may or may not receive remuneration in return), including sending to you notices and/or updates about gifts, discounts, privileged offers, benefits and promotions related to Services offered by us and/or the Service Providers, including without limitation: TV, telecommunications, over-the-top (OTT) services, content services, mobile voice, SMS and data communications, IDD/roaming, Internet connectivity, cloud services, mobile payment, entertainment, secretarial services, personal assistant services and information services (such as weather, finance and news information), device accessories, mobile applications and software, computer peripheral, accessories and software (including notebooks, handsets, mobile devices and accessories, keyboards, security installations and mobile applications), reward, loyalty and privilege programs, lifestyle, networking events, travelling, banking, alcohol and tobacco, sports, music, gaming, transportation, household products, food and beverages, finance, insurance, wealth management services and products, pensions, investments, brokering, financial advisory, credit and other financial services and products, betting, education, health and wellness, beauty products and services, fashion and accessories, electronics, social networking, technology, e-commerce, digital assets and related offerings and services, logistics, retail, home and décor, media and high-end consumer products and services. Marketing may be carried out in a variety of ways (such as in the form of a letter, bill insert/message, email, digital SMS, MMS, instant message, app push notification, targeted TV message, broadcast message on eye device, by telephone, social media or advertisements on websites or other means).

Before using and providing your Data for the purposes as set out in this Privacy Statement, where we are required by law to obtain your written consent, and in such cases, only after having obtained such written consent, may we use and provide your Data for any promotional or marketing purpose.

We will honour each individual's request to not use his/her Data for the purposes of direct marketing. You may opt-out from receiving direct marketing material and/or communications from the relevant Service, loyalty program and/or My HKT. At the same time, you may resume receiving the same (if you have previously opted- out of receiving such material and/or communications from the relevant Service, loyalty program and/or My HKT) by making a written request to our Group Data Protection Officer together with your registered name and service account number, registered telephone number or login name (as applicable).

Transfer of Data outside Hong Kong

At times it may be necessary and/or prudent for us to transfer your Data to places outside of Hong Kong, for instance, for the prevention, detection or investigation of crime or for storage, processing and other purposes for which the Data were collected. In the event that we do transfer your Data outside of Hong Kong, we will do so in compliance with the prevailing requirements of the Ordinance and the GDPR

where applicable.

The Safety of Your Data Is Important to Us

All required efforts are made to ensure that any Data held by us is stored in a secure and safe place and is accessible only by our authorised employees or other Organisations referred to in this Privacy Statement.

When we pass your Data to third party Organisations for them to process, we seek to ensure that they have appropriate security measures in place to keep your Data safe and to comply with applicable principles in relation to data protection. Some of the people we share your Data with may process it overseas. You can contact us for more information about the safeguards we use to ensure that your Data is adequately protected in these circumstances.

Retention of Your Data

We will retain your Data in accordance with our internal policies. Our policies are in compliance with the Ordinance and the GDPR where applicable, and cover the following principles:

- a. 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 Data is also retained to satisfy any applicable legal, regulatory or contractual obligations; and
- b. Data are purged from our electronic, manual and other filing systems based on the above criteria and our internal procedures.

Links

Our websites (including but not limited to www.hkt.com, <https://www.hktchina.com>, www.1010.com.hk, www.hkcs.com, www.netvigator.com, www.like100.hk, www.hkt-eye.com, www.nowtv.now.com, www.nowe.com, www.yip.com.hk, www.yiptrade.com, www.yipshop.com.hk, www.uhub.com, <https://smartliving.hkt.com>, www.hkt-starhomecall.com, www.hktpremier.com, www.hkteducation.com, www.hktfinancialservices.com, www.hktmerchantservices.com, www.tapngo.com.hk, www.hktflexi.com, <https://www.pay-later.com.hk>, <https://clubcare.theclub.com.hk>, <https://shop.theclub.com.hk>, www.clublike.com.hk, www.clubtravel.com.hk, <https://trip.clubtravel.com.hk>, www.clubhope.com.hk, www.clubsim.com.hk, www.theclub.com.hk, www.cs.hkt.com, www.biznetvigator.com and <https://www.hkt-enterprise.com>) and mobile and TV applications (if any) may contain links to other websites, webpages and mobile and TV applications operated by third parties. We have no control over the content of the

linked websites, webpages and mobile and TV applications or the way in which the operators of those websites, webpages and mobile and TV applications deal with your Data, and are not responsible for the content of such third party websites, webpages or mobile and TV applications. You should review the privacy policy of such third party websites, webpages and mobile and TV applications to understand the ways in which your Data may be used by those third parties.

Your Right to Access, Correct and Delete Data

We take all reasonable precautions to ensure that the Data we collect, use and disclose is accurate, complete and up-to-date. However, the accuracy of that Data depends to a large extent on the Data you provide. You have a right to request access to, and correction of, your Data and we recommend that you:

- a. let us know if there are any errors in your Data; and
- b. keep us up-to-date with changes to your Data.

If you wish to access or amend any of your Data we hold, or request that we delete (only applicable where the rights to erasure is required by law) any of your information that is no longer necessary for the provision of our Services, you may contact us in the manner as set forth under the “How to contact us” section.

If you are a user of My HKT, you may exercise your right of access and correction by logging on to your My HKT account where you will be able to view and correct the Data held by us about you. If you are not a user of My HKT, you may write to our Group Data Protection Officer at the details stated in the “How to contact us” section below.

We may apply an administrative charge for providing you with access to your Data in response to such request.

You may decline to share Data with us and/or withdraw any consents which you may have provided, in which case, we may not be able to provide you with some of our Services.

At any time, you may object to us holding or processing your Data, on legitimate grounds, save and except as otherwise permitted by the applicable law.

How to Contact Us

For all issues and enquiries regarding our compliance with our obligations under the Ordinance and the GDPR where applicable, and any request for access to, correction or deletion of your Data, please contact us in writing:

Group Data Protection Officer
HKT Limited

Mailing address: GPO Box 9896, Hong Kong

or

email: privacy@pccw.com

To raise an issue regarding our handling of your Data, please contact us in order that we can attempt to resolve your issue.

This Privacy Statement may be amended from time to time and all handling of Data will be governed by the most recent version of this Privacy Statement, available on our website at www.hkt.com/legal/privacy.html. If there is any inconsistency between the English and Chinese versions of the Privacy Statement, the English version will prevail.