

# 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 IMC Networks (“IMC”, “we”, “us” or “our”, being IMC Networks, its subsidiaries, affiliates and associated companies), including without limitation, customers of IMC Networks.

## 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. To 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:

- 1.the name, date of birth and other details documented on your Hong Kong Identity Card or other legal identity card, travel document and/or student card;
- 2.contact details including name, address, phone number, mobile telephone number and/or email address;
- 3.Data that you have shared with third party social media platform operators (e.g. account login name, profile picture, contact details);
- 4.payment details including credit card, debit card and other electronic payment Data;
- 5.account details or Data relating to Services registered with us including the relevant PIN, username or password, account numbers and/or service numbers;
- 6.device specific information such as hardware model, operating system, version, unique device identifier, serial numbers, setting configurations and software and mobile network configuration;

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7.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;

8.information that allows us to identify you for verification purposes including biometric information like your fingerprints and voice pattern;

9.health and biometric information (which could be provided to us when you use our health and wellbeing services);

10.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;

11.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

12.any other Data as may be required by any members of IMC Networks and/or their respective contractors, sub-contractors, intermediaries, agents, business partners or representatives, brokers or 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” for us so that we may further improve our Services and/or better tailor the type of information or content that we present to you:

age; gender and ethnicity; marital status; salary range and employment details; education and profession; hobbies and leisure activities; the Services that you have subscribed for; and 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.

Data supplied by you will be held by one or more members of IMC Networks, 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.

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## How We Collect Data

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

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 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; third parties such as related entities, business partners, other customers, or your representatives with appropriate consent from you; publicly available sources; our own records of how you use our Services; your visits on our websites, or mobile (see “Privacy Data” section below); and/or 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. This type of Data may include, but is not limited to:

browser type, version and user agent; operating system; IP (Internet Protocol) address and/or domain name; connection data, statistics on page views and/or referral URLs; device ID, location and phone contacts; links or images clicked on; cookies and/or browser, app or web server log data; and device and software characteristics and/or configuration.

Some of our websites use cookies or similar tracking tools on your machine or device 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. 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.

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## How We Use Your Data

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

- 1.to verify your identity;
- 2.to process your application to subscribe to our Services and loyalty programs;
- 3.to carry out matching procedures, as defined under the Ordinance;
- 4.to verify your eligibility for our offers of Services, games and/or promotions or other events;
- 5.to provide, activate and/or renew Services that you may have subscribed for;
- 6.to provide you with rewards, promotional benefits, updates, offers and invitations to events;
- 7.to promote and market our Services to you;
- 8.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 with other compliance purposes;
- 9.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;
- 10.to conduct surveys and marketing, promotional, behavioural scoring for business operations and/or planning purposes;
- 11.to carry out market and product analyses to generate statistical or actuarial reports (containing aggregated data that does not relate to any identified or identifiable individual);
- 12.to enforce our contractual rights;
- 13.to process any payment instructions, direct debit facilities and/or credit facilities with our supply of Services to you;
- 14.to maintain and develop our business systems and infrastructure, including testing and upgrading of these systems;
- 15.to maintain, enhance and develop our products and service offerings;
- 16.to develop financial services and products;

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17.to comply with our telecommunications license obligations in respect of interconnection arrangements with other telecommunications operators and related industry practices;

18.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

19.to distribute our publications and research materials and 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 data may be necessary for the performance of the Services that you have requested. 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 IMC Networks (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:**

customer enquiries; courier, delivery, logistic and warehouse services; mailing operations; billing and debt-recovery functions; information technology services; installation, maintenance and repair services; marketing, advertising and telemarketing services; market research; customer usage and behavioural analysis; process management; after sale services; surveys; website usage analysis; and cloud storage services.

We take the required steps to ensure that these Organisations are bound by appropriate confidentiality and privacy obligations about 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).

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## In Addition, We May Disclose Your Data:

1. to your authorised representatives and/or your legal advisers when requested by you to do so;
2. To providing administrative, payment, collection, business, legal and/or operational support, to the following parties:
3. credit-reporting and fraud-checking agencies;
4. to financial institutions, charge or credit card issuing companies, credit providers, credit bureaus, collection agencies or security agencies;
5. telecommunications network operators;
6. our affiliates, overseas offices, assignees, transferees and representatives;
7. our professional advisers, including our accountants, auditors, lawyers and insurers;
8. to banks, insurance companies, billing agents and various business partners for reward redemption purposes and benefits applicable to members of our loyalty programs, including without limitation to registering members for loyalty program related events;
9. to government and regulatory authorities and other organisations, as required or authorised by law;
10. 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;
11. 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
12. to charities or non-profit organisations.

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## 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 IMC Networks 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: 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 honor 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. 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) 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. If 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.

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## 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 under our internal policies. Our policies are in compliance with the Ordinance and the GDPR where applicable, and cover the following principles:

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

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 <https://imc-networks.com.hk/>) and mobile may contain links to other websites, webpages and mobile applications operated by third parties. We have no control over the content of the linked websites, webpages and mobile applications or the way in which the operators of those websites, webpages and mobile applications deal with your Data, and are not responsible for the content of such third party websites, webpages or mobile applications. You should review the privacy policy of such third party websites, webpages and mobile applications to understand the ways in which your Data may be used by those third parties.



# Privacy Statement

## 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:

let us know if there are any errors in your Data; and  
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 IMC Networks, you may exercise your right of access and correction by logging on to your account where you will be able to view and correct the Data held by us about you. If you are not a user of IMC Networks, 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 a request.

You may decline to share Data with us and/or withdraw any consent that 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:

email: [cs@imc-networks.com.hk](mailto:cs@imc-networks.com.hk)

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 <https://imc-networks.com.hk/>. If there is any inconsistency between the English and Chinese versions of the Privacy Statement, the English version will prevail.