

## **PRIVACY POLICY OF O.F.W. SERVICES LIMITED**

### **1. General**

This privacy policy sets out the policies and practices of O.F.W. Services Limited (“the Company”) in the collection, use, sharing and protection of customers’ personal information. The Company may update or change this policy and these changes will be posted in the Company’s website and applications.

### **2. Collection of Customer’s Personal Information**

- a. For the purpose of carrying on the Company’s business including sale, provision, registration and advertisements of the Company’s products and services, the Company will collect your personal information when you:
  - (i) purchase products and services from the Company (including purchase through on-line or the Company’s authorized dealers or agents);
  - (ii) subscribe or register a service of the Company;
  - (iii) update your personal information in relation to your registration or subscription to the Company’s services;
  - (iv) enquire information about a service from the Company;
  - (v) contact the Company with an enquiry or complaint;
  - (vi) enter any promotions, competitions, prize draws through the Company’s services;
  - (vii) use the Company’s services;
  - (viii) take part in market research;
  - (ix) visit, browse or download the Company’s applications.
- b. The Company may also collect information about you from other organizations including general business directories and credit information or reference bureau necessary to establish and support the payment of any services being requested by you.
- c. The Company may also collect information indirectly from you when you use the Company’s services including but not limited to when you:
  - (i) visit or browse the Company’s websites;
  - (ii) download the Company’s applications;
  - (iii) browse or otherwise access the Internet, WAP sites and/or the mobile internet through the company’s services

### **3. Types of Personal Data Collected**

- a. For the purpose of carrying on the Company’s business including provision, registration and administration of the Company’s services (including relevant on-line services), the information that the Company collects includes but is not limited to the following:
  - (i) your name;
  - (ii) account details, including user accounts;
  - (iii) contact details, including contact name and mobile telephone number and email address;
  - (iv) your date of birth;
  - (v) information for the verification of your identity, including identification type and identification number
  - (vi) your preferences for particular products, services or your hobbies and leisure activities;
  - (vii) an email or letter you send to the Company; and other records of any contact you have with the Company;
  - (viii) your account information, such as dates of payment, top-up information, the service plans you have subscribed; and any other information relating to your account;
  - (ix) payment details including credit card information, bank account and other banking information.
- b. In support of the services provided by the Company, information may be automatically collected by the Company on how you use the Company’s services, including but not limited to:

- (i) the telephone numbers and/or email addresses of calls, texts, MMS, emails and other communications made and received by you and the date, duration, time, origin and destination and cost of such communications;
- (ii) your browser type and version, searching, browsing and downloading history (including websites you visit), IP address and location data;
- (iii) internet PC location for broadband, address location for billing, delivery and installation.

The Company may use cookies across its websites in order to improve their performance and enhance your online experience. You may disable cookies on your web browser but if you do so, you may not be able to access certain areas or features of our websites.

- c. In certain situations, you may need to provide personal data of other individuals to the Company. By providing the Company with such personal data, you represent to the Company that you have obtained those individuals' authorisation and/or consent to the use, disclosure and transfer of personal data from you to the Company and from the Company to third parties and possible disclosure of the individual's details (including information on service usage) by the Company to you.
- d. If you choose not to provide your personal data, the Company may not be able to provide you with its services or carry out the activities mentioned in this policy.

#### **4. Use of Customers' Personal Information**

The Company may use and analyse your information for purposes including but not limited to:

- (i) the daily operation of the Company's services;
- (ii) verifying your identity and conducting credit checks when required;
- (iii) designing products and services for customers' use;
- (iv) keeping you updated of the Company's latest offers or promotions;
- (v) marketing services (in respect of which the Company may or may not be remunerated) in the manner set out in the "Direct Marketing" section below.
- (vi) assisting you with any services enquiries, including investigating and resolving service affecting issues;
- (vii) analysing usage of the Company's products and services by you and other customers so that the Company can further improve the Company's services and/or better tailor the type of products and services presented to customers;
- (viii) carrying out research and statistical analysis and monitoring customer use of the Company's services on an anonymous or depersonalised basis;
- (ix) assisting the Company in fraud and crime prevention;
- (x) contacting you if necessary.
- (xi) processing your order and providing the products and services that you have bought from the Company and keeping you updated with the progress of your order;
- (xii) billing you for using the Company's products or services;
- (xiii) protecting the Company's network service provider including managing the volume of calls, texts, data and other use of the Company's network service provider.

#### **5. Retention of Personal Data**

The Company will destroy any personal data it may hold in accordance with its internal policy. Personal data will only be retained for as long as the Company needs it for the purposes of use stated in this policy (and directly related purposes) unless the personal data is also retained to satisfy any applicable statutory, regulatory or contractual obligations or for the purpose of investigation, detection and prosecution of crime.

#### **6. Disclosure and Sharing of Personal Data**

- a. All personal data held by the Company will be kept confidential but the Company may disclose information about you to the following parties to use, disclose, process or retain your personal data for the purposes mentioned above and any other purposes indicated in this paragraph below:
  - (i) contractors, agents or suppliers who are involved in delivering the services you have used;
  - (ii) any banking or financial institutions, charge or credit card issuing companies;
  - (iii) credit information or reference bureaux;

- (iv) debit-collection agencies or other debt-recovery organizations;
  - (v) emergency services (if you make an emergency call), including your approximate location.
  - (vi) professional advisers (which shall include lawyers and auditors);
  - (vii) any agent, contractor or third party service provider who provides administrative, telecommunications, computer, payment, data analytics or other services to the Company in connection with the operation of its business;
  - (viii) law-enforcement or government bodies, regulatory bodies, courts or as required by law;
  - (ix) any person to whom the Company is under an obligation to make disclosure under the requirements of any law binding on the Company or under and for the purposes of any guidelines issued by regulatory or other authorities with which the Company is expected to comply;
  - (x) third party reward, loyalty and privileges programme providers;
  - (xi) external service providers (including but not limited to mailing houses, telemarketing and direct sales agents, call centres, data processing companies and information technology companies) that the Company engages for the purposes set out in paragraph 4.
- b. The Company may promote or refer to online stores or websites operated by its business partners or other third parties on the Company's website and application. If you want to use or order any services or products from them and click on their links, any information that you provided which is transferred to them will be beyond the Company's control. The Company takes no responsibility over such links. You are advised to study their privacy policies.

## **7. Direct Marketing**

- a. The Company intends to use your personal data such as your contact details, including contact name, mobile telephone number, email address, correspondence address and other information such as information about the products or services you have viewed online or purchased and your location data so that the Company and/or its business partners can send you information, materials, products, offers and news about the following products and services (in respect of which the Company may or may not be remunerated):
- (i) all products and services by the Company including its online platforms, mobile applications, entertainment and information services, Internet connectivity and data communications on the Internet;
  - (ii) reward, loyalty or privileges programmes and related products and services; and
  - (iii) products and services offered by the Company's business partners including travel, dining, entertainment, apparel, health & beauty, education, household, transportation, banking, insurance and other consumer products and services.

The Company will seek your consent or indication of no objection before the Company uses your personal data in direct marketing.

- b. You may opt out (free of charge) from receiving direct marketing communications at any time in writing by post to the address stated in paragraph 10(c) below or by other means stated in the Company's website and applications from time to time.

## **8. Security of Personal Data**

- a. The Company has adequate measures to protect your personal information from unauthorized access, accidental loss or destruction.
- b. If the Company has a contract with another third party organization to provide a service on its behalf, the Company will ensure they have appropriate security measures and only process your information as the Company has authorized. Those organizations will not be entitled to use your personal information for their own purposes. The Company will take reasonable steps to check these organizations to make sure that they are meeting the security requirements set by the Company.

## **9. Transfer of Personal Data Outside of Hong Kong**

At times it may be necessary and/or prudent for the Company to transfer certain personal data to other group companies or service providers outside of the Hong Kong Special Administrative Region

(“Hong Kong”). This may happen if the Company’s servers or suppliers and service providers are based outside of Hong Kong or if you use the Company’s services while visiting countries outside Hong Kong. The Company will take steps to ensure that your personal information is used by such third parties in accordance with this policy.

## **10. Your Privacy Rights**

- a. In accordance with the Personal Data (Privacy) Ordinance (“the Ordinance”) and subject to exemptions specified in the Ordinance, you have the right to:
  - (i) check whether the Company holds personal data about you and to receive copies of such data;
  - (ii) require the Company to correct any personal data relating to you which is inaccurate; and
  - (iii) ascertain the Company’s policies and practices in relation to personal data and to be informed of the kind of personal data held by the Company.
- b. In accordance with the Ordinance, the Company has the right to charge a reasonable fee for processing a data access request.
- c. Requests for access to personal data, correction of personal data, information relating to the kind of data held and to stop receiving or re-start receiving direct marketing, may be made in writing by post to:

The Data Protection Officer  
O.F.W. Services Limited  
P.O. Box 68202, Kowloon East Post Office, Kowloon

Please identify yourself with your name and contact number when writing to the Data Protection Officer.

## **11. Privacy Policy Published at the Company’s Website and Application**

This Privacy Policy is subject to change from time to time without prior notice and any changes will be posted on the Company’s website and applications. You are advised to check for the latest version regularly. If there is any inconsistency or conflict between the version posted on the Company’s website and applications and the previous versions, this version shall prevail. All handling of personal data will be governed by the most recent version of the policy. If there is any inconsistency or conflict between the English and Chinese versions of this Privacy Policy, the English version will prevail.