

## RICH BRAND PROPERTY LIMITED

### Data Privacy and Security Policy

This policy (“**Policy**”) sets out how Rich Brand Property Limited and its subsidiaries (collectively, “**RBP**”, “**we**”, “**our**” or “**us**”) collect, use, store and handle personal data.

#### A. Commitment to Personal Data Protection

We are committed to protecting the privacy of the personal data (“**Personal Data**”) we hold. To ensure that you can make informed decisions and feel confident about providing your Personal Data to us, we outline in this Policy our practices and the choices you have concerning the collection and use of your Personal Data.

#### B. The Personal Data We Collect

For the purpose of complying with the Laws of Hong Kong SAR (including the Estate Agents Ordinance and its subsidiary legislations and regulations) in the verification of the identity of both the vendor/landlord and the purchaser/tenant, the prevention of money laundering and in order to market properties and provide services or market information, perform registration and administration functions of RBP, your Personal Data will be collected upon, without limitation:

- signing an estate agency agreement to appoint us as your estate agent;
- signing a provisional sale and purchase agreement/tenancy agreement;
- purchasing first hand property;
- applying customer due diligence;
- contacting us for enquiry or complaint;
- participating in marketing and promotion activities, competitions, prize draws through us;
- using our intermediary service; and/or
- using or visiting our website or mobile application.

The types of Personal Data we collect from you will depend on the specific type of services and products as requested by, or provided to you. The types of Personal Data may include (without limitation) the following:

- your personal information (e.g. your name, gender, date of birth, passport or other personally identifiable number);
- your contact information (e.g. telephone numbers, mailing addresses, email addresses and fax numbers);
- your business information (e.g. company name, business title and associated contact information);
- addresses of properties owned or leased by you;
- your preferences for particular properties or services;
- your credit or debit or other charge cards information (e.g. name of cardholder, card number, billing address, security code and expiry date);
- your account records, such as date of payment and transaction information;
- your travel details (e.g. flight information, travel companions' personal information and information related to traveler's special needs or preferences);
- your interests, personal preferences or comments;
- your comments and responses to market surveys, contests and promotional offers conducted by us or on our behalf; and/or
- information when you use our websites or other services or products (e.g. behavioural information, purchasing history, location information, browser details, IP addresses).

Certain Personal Data (e.g. relating to your personal information and contact information) are required for specific services and if you fail to supply such Personal Data as requested from each specific service, we may not be able to deliver you the services or products. By providing your Personal Data to us, you acknowledge that such provision is fair and reasonable in the circumstances. If you refuse to provide Personal Data, we have discretion not to provide services to you for the avoidance of breaching the relevant laws and regulations.

### C. Purposes for which your Personal Data are Collected and Used

The purposes for which your Personal Data are collected and used may include (without limitation) one or more of the following purposes:

- for the supply of any services, products, facilities and/or other subjects (together, the “**Services**”) which we or any of our subsidiaries, holding companies, joint ventures and associated companies (together, “**RBP Group**”) may offer to you, or you may require from us, from time to time;
- for payment purposes for any of the Services of RBP Group, including verification of credit card details with third parties;
- for use of the online services available at any of the websites of RBP Group and/or through other telecommunication channels;
- with your consent, for marketing or promoting any of the Services of RBP Group (e.g. sending you updates on our latest offers and promotions in relation to any of our Services from time to time);
- with your consent, for promoting and soliciting donations or contributions for charitable or nonprofit making causes;
- for leasing, development, sale or purchase of any of the Services of RBP Group and/or for management or other related services;
- for identification and verification purposes in connection with any of the Services that may be supplied to you;
- for reservations with or through us or any member of RBP Group;
- for communicating with you by email, mail, fax, phone or other means, including contacting you regarding your enquiries;
- for conducting research and/or analysis from time to time to better understand your shopping, dining, spending and/or other consumption needs, preferences, interests, experiences and/or habits;
- for designing new and/or enhancing existing Services, activities, contests, lucky draws and/or other events (together, the “**Activities**”) relating to RBP Group’s portfolio of properties or tenants in such portfolios of properties (“**Merchants**”), and/or administering any of the Activities conducted by RBP Group (or on its/their behalf) or by the Merchants;
- for managing customer relationship and relationship with RBP Group’s Merchants;

- for operating and administering any membership clubs or loyalty or reward programmes;
- for making disclosures when required by law, regulation, or court order of any jurisdiction and/or as requested by any government, regulatory or law enforcement authority or administrative organisation, which may be within or outside The Hong Kong Special Administrative Region of the People's Republic of China (“**Hong Kong**”);
- for establishing legal claims or defences, obtaining legal advice, and/or exercising, defending and/or protecting the rights or properties of any member of RBP Group, including identifying, contacting or bringing legal action against any person who may be causing interference with such rights or properties (whether intentionally or otherwise) or where any other person could be harmed or property of any other person could be damaged by such interfering activities;
- for the use by any member of RBP Group in connection with any of the above purposes and/or any of the Services that any member of RBP Group may offer or supply to you from time to time; and/or
- for any other incidental or associated purposes relating to the above, or any other purposes as specified in a personal information collection statement when your Personal Data is being collected, or any other purposes which you may from time to time agree.

We will not knowingly or intentionally use, share or sell your Personal Data in ways which are unrelated to the above purposes (or purposes as specified in a personal information collection statement when we collect your Personal Data) without your prior consent.

#### **D. Disclosure and Transfer of Personal Data**

To facilitate the purposes mentioned under “**C. Purposes for which your Personal Data are Collected and Used**”, we may transfer, disclose, grant access to or share your Personal Data with third parties located within or outside Hong Kong, and your Personal Data may be transferred within or outside Hong Kong. These third parties may include the following:

- any member of RBP Group;
- any agent, contractor or third party service provider who provides administrative, marketing, research, distribution, data processing, telemarketing, telecommunications, computer, payment or other services to or support the operation of RBP Group's business (including its/their direct marketing activities);
- other business associates such as loyalty programme operators and other companies involved in providing customer service or fulfilling customer requests;
- credit reference agencies, credit, debit and/or charge card companies and/or banks;
- medical professionals, clinics, hospitals, insurers and/or loss adjustors;
- any person, government or law enforcement authority or administrative organisation;
- any person under a duty of confidentiality to any member of RBP Group (including accountants, legal advisers or other advisers);
- any actual or proposed assignee or purchaser of all or any part of the business and/or asset of RBP Group and/or
- charitable or non-profit marketing organisations.

The Personal Data you provide to us may also be sourced from or transferred to other jurisdictions outside Hong Kong for the purposes mentioned above.

## **E. Direct Marketing**

If we intend to use your Personal Data (including your name and contact details) collected from you for direct marketing purposes (e.g. to send you marketing communications about news, offers or promotions in relation to the Services or Activities of RBP Group or its Merchants), we will first obtain your consent (or an indication of no objection) before doing so.

If we intend to provide your Personal Data (including your name and contact details) collected from you to third parties for their use in direct marketing, we will first obtain your consent (or an indication of no objection) before doing so.

If you agree to receive marketing communications but do not wish to receive them in the future, you may opt out of receiving them at any time, free of charge, by the following applicable means:

- unsubscribing by following the “Reply To” instructions contained in the marketing text message;
- following the unsubscribe instructions or hyperlink in the email;
- following the unsubscribe instructions in the mobile application;
- notifying us that you no longer wish to receive marketing communications when receiving our marketing calls; or
- contacting us at the address stated in paragraph J below to tell us that you no longer wish to receive marketing communication through any channel.

We may issue service-related announcements to you when necessary (e.g. when we suspend a service due to system maintenance). You may not be able to opt out of these announcements which are service-related and not promotional in nature.

## **F. Use of Cookies and Log Files**

If you visit any of our websites, we may use cookie files to store and track information about you and your preferences. A cookie is a small text file that our website transfers to your computer's or device's hard disk. We use cookies to better serve you and/or maintain your information across multiple pages within or across one or more sessions. Most web browsers automatically accept cookies, but if you prefer, you can edit your browser options to block them in future. However, if you disable cookies or refuse to accept a request to place a cookie, certain functionalities on our websites may not be available.

Cookies contain information about you and your preferences. For example, if you inquire about rates and availability, the site might create a cookie that contains the details you entered. Or it might only contain a record of which pages within the site you visited, to help the site customise the view for you the next time you visit.

Only the information that you provide, or the choices you make while visiting a website, can be stored in a cookie. For example, the site cannot determine your email name unless you choose to type it. Allowing a website to create a cookie does not give that or any other site access to the rest of your computer, and only the site that created the cookie can read it.

We may also collect information regarding your IP address, browser type, domain name and access time. This information is used for our own research purposes. As it is not linked to any personal information, it is separate from your Personal Data. In rare instances, IP addresses may be used to assist in deterring and/or preventing abusive or criminal activity on the website.

If you use the WiFi available at our properties, we may collect your location data (if you have consented to this on your device). We may use your location data to keep track of your activity patterns and preferences in order to improve the level of service you receive. Your location data may be combined with other information we receive from third parties to provide you with better service and, where you have consented to receive direct marketing, we may provide you with targeted advertisements, content, features, deals and offers in relation to the classes of marketing subject as set out in the relevant personal information collection statement when your Personal Data is being collected.

If you interact with us on social media platforms (for example if you "Like" our Facebook Page or post on our timeline), we can interact with you and send you messages via these platforms. We will interact with you in accordance with the social media platform's rules but we are not responsible for how the platform operators collect and handle your Personal Data. We are not responsible for what third parties post on our social media accounts.

## **G. Data Retention**

Subject to any legal, statutory, regulatory or accounting requirements, the Personal Data you provide to us will be kept by us in the appropriate form only for as long as is necessary to fulfil the purposes mentioned above after which it will be destroyed.

## **H. Data Security**

In order to ensure the correct use and to maintain the accuracy of the Personal Data collected from you, as well as preventing unauthorised or accidental access, processing, erasure or other use of the Personal Data, we have implemented various internal policies (including physical, electronic and management measures) to safeguard and secure the Personal Data we collect.

For example, where we collect Personal Data online, we use an industry standard for encryption over the Internet known as Secure Socket Layer (SSL) protocol, to protect the Personal Data.

Our websites have firewalls in place, which should protect the Personal Data collected from you against unauthorised or accidental access. However, complete confidentiality and security is not yet possible over the internet, and privacy cannot be assured in your communications to us. You are encouraged to protect against unauthorised access to your password and credit card details. Make sure you sign out from your account when finished particularly when using a shared computer.

## **I. Other Websites**

In order to anticipate your needs, our websites may contain links to third party sites that are operated under different privacy practices.

All such websites are independent from our websites. We have no control over the contents of such other websites or their privacy policies or compliance with the law. You should therefore be fully aware the provision of such links does not constitute an endorsement, approval, or any form of association by or with RBP Group. We have no control over Personal Data that is submitted to these other websites. You should remain alert when you leave our websites, and read the privacy statements of other websites.



## J. Your Rights and Contacting Us

You are entitled to access or correct your Personal Data held by us. You may also:-

- request deletion or erasure of your Personal Data;
- object to the sharing of your Personal Data; and/or
- object to the profiling of your Personal Data.

If you would like to exercise any of the above rights or obtain a copy of any of your Personal Data, or if you believe that any of your Personal Data which we collect and maintain is inaccurate or would like to request for information regarding our policies and practices and the kinds of Personal Data held by us, please contact us at the following address:

**Data Protection Officer**

**Rich Brand Property Limited**

**Shop 234, BLK 1-3 City Garden,**

**233 Electric Road, North Point**

**Hong Kong**

We will endeavour to use appropriate technical means to ensure that you can access, update and correct your Personal Data. In accessing, updating, correcting and/or deleting your Personal Data, we may ask you to authenticate your identity in order to protect the safety of your Personal Data.

To the extent permitted by relevant laws and regulations, we reserve the right to refuse unreasonable requests (for example, requests which infringe the privacy of others).

To the extent permitted by relevant laws and regulations, we reserve the right to charge a reasonable fee for the cost of processing any request set out above.

## K. Note

This Policy may be amended from time to time. You may access and obtain a copy of this Policy, as amended from time to time, at [www.richbrandproperty.com](http://www.richbrandproperty.com) so that you are always informed of the way we collect and use Personal Data.

This Policy is written in the English language and may be translated into other languages. In the event of any inconsistency between the English version and the translated version of this Policy, the English version shall prevail.

03/2020