## **Data Privacy Policy**

## Objectives

To protect our information assets from any internal, external, deliberate or accidental threats. To ensuring that all information, including internal, third party, personal and electronic data, is treated with complete confidentiality; and complying with all applicable statutory and regulatory requirements

## Measures

- Records which include administration and operational files, personal data provided to the company from individuals for participating in promotional activities, data relating to consultancy services, compliance check records, matching procedure applications, records of inspections of personal data systems and enquiries from the public, etc. are kept for various purposes which vary according to the nature of the record, such as administration of office functions and activities, seeking advice on policy or operational matters, organising and delivering promotional, acquisition of services, subscription of publications, handling of compliance checks, matching procedure applications, enquiries from the public and conduct of inspections of personal data systems, etc.
- Personal data held in complaint and investigation records are kept for the purposes of responding to and taking follow-up action on complaints, including conciliation between the parties concerned, investigation, if appropriate, and any enforcement or prosecution; legal assistance records are kept for purposes which are directly related to the processing of legal assistance applications and any subsequent legal proceedings
- Records collected on webservers access log are for the purpose of maintaining and improving our websites such as to determine the optimal screen resolution, which pages have been most frequently

visited, etc. We use such data only for website enhancement and optimisation purposes. We do not use, and have no intention to use the visitor data to personally identify anyone.

- The Company takes appropriate steps in accordance with guideline and regulations of Office of Privacy Commissioner for personal data, Hong Kong to protect the personal data we hold against unauthorised or accidental access, processing, erasure, loss or use - which includes disclosure or transfer.
- The Company maintains and executes retention policies of records containing personal data to ensure personal data is not kept longer than is necessary for the fulfilment of the purpose for which the data is or is to be used. The personal data collected for complaint, investigation, compliance check and enquiry purposes is used only for purposes directly related to the discharge of our statutory and administrative functions and activities.