



iAdvantage - Privacy Policy

Privacy Policy Statement

We pledge to safeguarding the privacy of the customers of our products and/or services ("**Customers**") and their authorized representatives ("**Authorized Representatives**") with respect to their personal data in compliance with the requirements of the Personal Data (Privacy) Ordinance, Chapter 486 of the laws of the Hong Kong SAR ("**Ordinance**"). In doing so, we will ensure compliance by our staff with the applicable standards of security and confidentiality. For the purpose of this Privacy Policy Statement, "**Personal Data**" means, in relation to any of the Customers and the Authorized Representatives ("**Data Subject**"), any personally identifiable information of such Data Subject, including, but not limited to, his or her name, gender, age, identity document number, telephone number, fax number, home address, email address, credit card / smart card information, bank account number, education level and occupation, etc.

It is the policy of our Group (or "**we**", or "**us**", which shall collectively mean SUNeVision Holdings Ltd. and its subsidiaries (including iAdvantage Ltd.)) to safeguard all Personal Data provided by the Data Subjects. We do not collect any Personal Data from any person during their browsing of our web sites. When any person visits our web sites we record their visit only as a 'hit' and do not collect any Personal Data from them. Our Internet service provider will however make a record of their visit that shows only the Domain Name Server address, part of their e-mail address, and of the pages visited. They will only disclose to us aggregate information about the number and types of visitors by reference to their Domain Name Server address. We use this information only for preparing general statistics on the usage of our web sites.

If Personal Data will be collected in the process of making enquires or submitting applications for products and/or services provided by different operations within our Group, Data Subjects will be informed via the [Personal Information Collection Statement](#) of the purposes of collecting such data and its uses, including the extent to which their Personal Data will be transferred and/or disclosed, and their right of access to, and correction of, the Personal Data.

In order for us to provide Data Subjects / visitors of our web site with customizable and personalized services, we use 'cookies' to store and sometimes track information

about Data Subjects / visitors of our web site. The information collected by means of 'cookies' includes Data Subjects' / visitors' log-in name and his or her navigation pattern. This is done without Data Subjects / visitors being aware that it is occurring. Generally, we use 'cookies' to estimate our audience size; to track Data Subjects' / visitors' progress and number of entries in our promotional activities; to assist merchants in tracking visits to, and business at, their stores, and to measure Data Subjects' / visitors' traffic patterns. Personal Data collected by means of 'cookies' will not be disclosed to any third parties except to those companies within our Group and to Sun Hung Kai Properties Limited (our holding company) and its subsidiaries ("**SHKP Group**").

Once we have obtained Personal Data, it will be maintained securely in our system. We shall retain such Personal Data for 3 years after the Customer ceases to be our customer and after the Authorized Representative ceases to be authorized as such. Only the authorized staff, who have been properly trained, will be permitted access to such Personal Data, and we shall not release such Personal Data to any external parties (except those parties set out in our [Personal Information Collection Statement](#)) without the agreement of the Data Subject.

We may from time to time send direct marketing materials promoting products and/or services to Data Subjects based on their Personal Data but shall stop doing so when being advised in writing that Data Subjects do not wish to receive further materials from us. Suitable opt-out facilities will be provided during the direct marketing process.

We shall implement necessary measures to ensure that the privacy of the Data Subjects is properly protected. However, given the nature of the Internet, we cannot guarantee that there is "perfect security".

In order that we can offer and provide more information and services, we use third party content providers and service providers, and provide links to other web sites. These third parties may collect Personal Data about you when you acquire their products or use their services. These third parties are responsible for adhering to their own privacy policies and practices, and we will not assume any responsibility or liability to you in connection with their use of your Personal Data.

Data Subjects may review and edit his or her Personal Data on-line by visiting our web sites at [iAdvantage Limited](#). Should Data Subjects have any queries about our

privacy policy and practice, please e-mail to our Data Protection Officer at dpo@sunevision.com.

Personal Information Collection Statement

We are committed to safeguarding your privacy with respect to your Personal Data. This statement is given in compliance with the Ordinance to notify you of certain matters when collecting your Personal Data from you. This statement may change from time to time, so please check back periodically. By (a) visiting our website, or (b) continuing to remain as our Customer and (in the case of the Authorized Representatives of the Customer) by continuing to remain authorized as such and by subscription and every time you log-in to this web site, you agree to be bound by this statement at that time in force and agree to us using, disclosing and transferring your Personal Data for the purposes and in the manner set out herein.

Collection of Data

At the time of subscription / when you apply for any of our products and/or services and at other times when using this web site, you may be asked to provide us with your Personal Data. It is necessary for us to collect your Personal Data for providing you with various products and/or services and activities offered on this web site. If you fail to provide your Personal Data as requested, we will not be able to provide you the products and/or services and activities available on this web site.

Purpose and Use of Personal Data

The Personal Data we collected will be used for the following purposes:-

1. to monitor use of this web site and to help its further development;
2. to compile aggregate statistics about our users / visitors of our web site and to analyze their usage of our products and/or services;
3. to collect data for identity verification and records and to maintain contact lists for correspondence;
4. to operate internal control, resolve disputes, troubleshoot problems and enforce our terms of use (see [Legal Statement](#));
5. to recover any overdue payment;
6. to deliver information to you that we believe you may have interest in, such as

targeted banners, new services and products and other promotions and marketing materials; and

7. to contact you regarding administrative notices, communications and any other matters relevant to your use of this web site, our products and/or services, and to respond to your request (such as to liaise with you about moving or removing your equipment and cabling).

We may also use your Personal Data to match user information with third party data (i.e. to compare two sets of Personal Data collected for different purposes). By subscribing to this web site or by logging-in, you consent to the carrying out of this matching procedure when we deem it is necessary in order to provide our products and/or services.

In addition, we will also use your Personal Data in the following manner:-

1. We may share your Personal Data with our business partners, subsidiaries and associated companies, including the SHKP Group for any of the purposes set out in this [Personal Information Collection Statement](#).
2. We may share your Personal Data with debt collection agencies, credit reference agencies, professional advisers, regulatory bodies, law enforcement agencies, the court, and any actual or proposed assignees or transferees of our rights with respect to you.
3. In order to provide you with more information (including information about our products and/or services), we have arranged content providers and service providers to provide information and services. It may be necessary for us to share your Personal Data with these content providers and service providers.

If we add new features, products and/or services that may require the sharing of your Personal Data with an additional advertiser or sponsor, we will provide you with notice and the opportunity to opt out of receiving these offers.

Transfer of Data

Your Personal Data will not generally be disclosed or transferred to any other party in a form that would identify you except in the following circumstances:-

1. If we use third party suppliers or service providers to facilitate the provision of

our products and/or services, we will have to provide your Personal Data to these suppliers or service providers.

2. We may disclose or access your Personal Data when we believe in good faith that applicable laws, rules and regulations require it.
3. We may also disclose or access your Personal Data for administrative and other purposes that we deem necessary to maintain, service, and improve our products / services.

In addition, your Personal Data may be accessed by, disclosed or transferred to our business partners, subsidiaries and associated companies, including the SHKP Group for any of the purposes set out in this [Personal Information Collection Statement](#).

As the parties mentioned above may have places of business outside Hong Kong, your Personal Data may be transferred out of Hong Kong. By subscribing to our web site or by logging-in or by continuing to remain as our Customer or (in the case of the Authorized Representatives of the Customer) by continuing to remain authorized as such, you agree to us transferring your Personal Data to these parties outside Hong Kong. These third parties are responsible for adhering to their own privacy policies and practices and we have no control over their use of your Personal Data. Therefore, we will not assume any responsibility or liability to you in connection with their use of your Personal Data.

Please also see our [Privacy Policy Statement](#) which sets out our general privacy policy and practices in respect of our collection, holding and use of your Personal Data.

Access to Personal Data

You have the right to request access to, and correction of, your Personal Data held by us. If you need to check whether we hold your Personal Data or if you wish to have access to your Personal Data and/or to correct any of your Personal Data which is inaccurate, please fill in the personal data access request form and e-mail it to our Data Protection Officer at dpo@sunevision.com. You agree to pay us reasonable charges incurred by us in relation to administering and complying with your request.

Please note that the [Privacy Policy Statement](#) and the [Personal Information Collection Statement](#) may be amended from time to time. Notices regarding amendments will



be posted at the homepage of the website of iAdvantage Ltd. (at [iAdvantage Limited](#)) on the effective dates of the amendments. Amendments will not have retrospective effect.