



## **Octopus Rewards Limited**

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### **GENERAL**

1. Octopus Rewards Limited ("ORL"), the operator of a consumer rewards and targeted offers programme (which we will refer to as "Octopus Rewards programme" or the "Programme") in conjunction with Our Partners, respects the privacy of its Members and understands the importance of privacy to visitors to its website. ORL (the "Company", "we", "our" or "us") collects and retains information so that we can efficiently provide services to our Members. This Privacy Policy Statement is designed to help you understand what information the Company gathers and what we do with the information.

### **DEFINITIONS AND INTERPRETATION**

2. In this Privacy Policy Statement, unless the context otherwise requires,



"Application Form" means any form containing an application by the Member.

"*Octopus*" means the Octopus card or product ("product means a consumer item manufactured by Octopus Cards Limited ("OCL") or a third party authorized by OCL incorporating OCL's technology such as watch, phone cover, keyring etc.) issued subject to the Conditions of Issue, including the Personalised *Octopus* and, where applicable, the anonymous *Octopus*.

"Member" means any person who has registered as a member of the Programme by providing information in accordance with Clause 4.1 of the Terms and Conditions and activating his/her Membership *Octopus*. The expression "Members" shall be construed accordingly.

"Membership *Octopus*" means the *Octopus* you hold that you have registered in the Programme by providing the number of that *Octopus*. Your Membership *Octopus* will be your Membership ID for the Programme.

"Conditions of Issue" means the Conditions of Issue of Octopus published by OCL as amended from time to time, which can be obtained from OCL or downloaded from the OCL website at **[www.octopus.com.hk](http://www.octopus.com.hk)**

"Terms and Conditions" means the Terms and Conditions for the Octopus Rewards Programme published by the Company as amended from time to time which can be obtained from the Company or downloaded from our website at **[www.octopusrewards.com.hk](http://www.octopusrewards.com.hk)**

"Ordinance" means the Personal Data (Privacy) Ordinance (Cap. 486) of the Laws of the Hong Kong Special Administrative Region.



"Personal Data" means any personal data held by the Company including all information provided by Members in the Application Forms and all the information relating to the use of the *Octopus* in the Programme from which it is practicable for a Member's identity to be directly or indirectly ascertained.

"Our Partners" means our business partners including entertainment/recreation facilities providers, retailers (supermarkets, electronic products, pet shops, bakery shops, shopping malls, food and beverages, apparel, financial and telecommunication industries) and others who wish to offer you benefits and targeted offers ("Our Issuing Partners") or redemption offers ("Our Redemption Partners"), currently as listed on our official website at [www.octopusrewards.com.hk](http://www.octopusrewards.com.hk). Most of Our Partners will offer Reward\$ issuance, some will offer Reward\$ redemption and some will offer both Reward\$ issuance and redemption.

"Benefits" – Depending on the information provided by you in accordance with Clause 4.1 of the Terms and Conditions, this may include Reward\$, promotions and other carefully selected offers that you may receive from us.

"Reward Dollars" or "Reward\$" or "R\$" mean a standard Benefit issued and recognised under the Octopus Rewards programme that you can use for the redemption of certain goods and services with Our Redemption Partners.

"Octopus PC Reader Service" means the service where you may activate the Octopus Rewards functions on your Membership Octopus and check the balance of the Reward\$ on your Membership Octopus through our website [www.octopusrewards.com.hk](http://www.octopusrewards.com.hk) by using an Octopus PC Reader which is connected to your own personal computer.

"Octopus Rewards Activation" means the activation of the Octopus



Rewards functions on your Membership Octopus by visiting one of our Octopus Rewards Stations or our website [www.octopusrewards.com.hk](http://www.octopusrewards.com.hk) by using the Octopus PC Reader Service.

“Octopus Rewards Stations” means the servicing points that provide services relating to Octopus Rewards Activation, Reward\$ balance enquiries and Reward\$ downloads.

### **OUR COMPANY POLICY**

3. We pledge to meet fully, and where possible exceed, internationally recognised standards of personal data privacy protection in complying with the requirements of the Ordinance. In doing so, we promise to:
  - (i) collect adequate, but not excessive, Personal Data by lawful and fair means for lawful purposes directly related to our functions and activities;
  - (ii) take all reasonably practicable steps to ensure that all Personal Data collected or retained are accurate, having regard to the purposes for which they are to be used;
  - (iii) ensure that Personal Data are not used where there are reasonable grounds for believing that they are inaccurate, having regard to the purposes for which they are to be used;
  - (iv) erase Personal Data which are no longer necessary for the fulfillment of the purposes for which they are to be used;
  - (v) use Personal Data only for purposes for which the data were to be used at the time of the collection of the data, unless you have given your express consent for a change of use or such use is



required or permitted by the Ordinance or the law of Hong Kong Special Administrative Region ("Hong Kong");

- (vi) take all reasonably practicable steps to ensure that Personal Data are protected against unauthorized or accidental access, processing, erasure or other use;
- (vii) take all practicable steps to ensure that you can be informed of the kinds of personal data we hold and the main purposes for which the data are to be used; and
- (viii) allow you to access and request correction of your Personal Data held by us in a manner prescribed by the Ordinance. We may charge you a fee as permitted by the Ordinance in complying with your data access request.

## **STATEMENT OF PRACTICES**

### **TYPES OF PERSONAL DATA COLLECTED AND HELD**

- 4. For the purpose of conducting the Company's business (including relevant online services), we may collect from you and hold some or all of your Personal Data such as, but not limited to, the following to enable us to operate the Programme or provide other related services to you :
  - a. Your *Octopus* number;
  - b. Your name;
  - c. Your gender;
  - d. Contact details, including contact number, mailing address, or email address;
  - e. Your preferred language for communications;
  - f. Your marital status;
  - g. Your family status as to whether you have children;
  - h. Your age range;



- i. Your education level;
  - j. Your occupation;
  - k. Your monthly household income range;
  - l. Your interests;
  - m. Your *Octopus* usage data (only applicable when your identity can be directly or indirectly ascertained from the *Octopus* usage data).
5. Our web servers may also collect data relating to your online session including your IP address and/or domain name, the use of which is to provide aggregated, anonymous, statistical information on the server's usage so that we may better meet the demands and expectations of browsers to our websites.
6. We use cookies to identify a computer and it often includes an anonymous unique identifier. Cookies are small bits of information that are automatically stored on a person's web browser in their computer that can be retrieved by this site. The information collected by cookies is anonymous aggregated research data, and contains no name or address information or any information that will enable anyone to contact you via telephone, email or any other means. Most browsers are initially set to accept cookies. If you would so prefer, you can set your browser to disable cookies. However, by disabling them, you may not be able to take full advantage of our website, including online services.

## **PURPOSES OF KEEPING PERSONAL DATA**

7. Personal Data of the Member held by us may be used for the following purposes:
  - a. processing your registration for Membership *Octopus* ;
  - b. providing you with carefully selected offers, promotions and benefits by us, our subsidiaries, our affiliates (that is, our direct holding company and its subsidiaries) and/or Our Partners. We,



- our subsidiaries and/or our affiliates may need to carry out internal operational procedures to enable us:
- (i) to better understand your characteristics and to provide other services better tailored to your needs (such as offering special promotions to you);
  - (ii) to assist us in selecting goods and services that are likely to be of interest to you;
  - (iii) to establish whether you already have a relationship with Our Partners; and
  - (iv) to arrange marketing offers;
- c. providing you with regular communications from us with details of the Programme and its Benefits;
  - d. the management, operation and maintenance of the Programme, including audit and exercising our and your rights under the Terms and Conditions;
  - e. designing new or improving existing services provided by us, our subsidiaries and/or our affiliates ;
  - f. investigation of complaints, suspected suspicious transactions and research for service improvement;
  - g. prevention or detection of crime; and
  - h. disclosure as required by laws, rules, regulations, codes or guidelines.

## **DISCLOSURE OF PERSONAL DATA**

- 8. All Personal Data will be kept confidential by us but in accordance with the Terms and Conditions we may, for the purpose(s) set out in paragraph 7 above, transfer or disclose such Personal Data to the following parties within Hong Kong (except that the parties set out in sub-clause (a) below may be located outside Hong Kong):
  - a. our agents or contractors under a duty of confidentiality to us who provide administrative, telecommunications, computer, payment, data processing or other services to us in connection with the



operation of our business (such as professional advisors, call centre service providers, gift redemption centres, or data entry companies);

- b. our subsidiaries and/or our affiliates which owe a duty of confidentiality to us; and
- c. any law enforcement agencies and/or regulatory bodies for compliance with applicable laws, rules, regulations, codes and/or guidelines and/or any person or entity to whom we, our subsidiaries and/or our affiliates are under a binding obligation to make disclosure under the requirements of any law, rule, regulation, code and/or guideline and/or order of any competent court of law, law enforcement agencies and/or regulatory bodies, but such disclosure will only be made under proper authority.

## **SECURITY AND RETENTION OF PERSONAL DATA**

- 9. We treat security as our top priority. We will strive to ensure that Personal Data will be protected against unauthorized or accidental access, processing or erasure. In doing so, we have implemented appropriate physical, electronic and managerial measures and controls to safeguard and secure the Personal Data.
- 10. Our web servers are protected by appropriate firewalls which will be kept up-to-date. However, as the security of ordinary email cannot be guaranteed, you should not send to us any email containing any Personal Data.
- 11. We will not keep Personal Data longer than is necessary for the fulfillment of the purposes (including any directly related purpose) for which they are, or are to be, used. We will purge unnecessary Personal Data from our system in accordance with our internal procedures.

## **ACCESS AND CORRECTION OF PERSONAL DATA**



12. You have the right to ask us if we hold any Personal Data about you and if so, to request a copy of some or all of your Personal Data. If you would like to make such request, please submit the "Data Access Request Form" (the prescribed form (form:OPS003) can be downloaded from the following link <http://www.pcpd.org.hk/english/publications/files/Dforme.pdf> or obtained by fax through our Interactive Voice Response System on 3690-1313), along with appropriate proof of identity (a copy of the applicant's Hong Kong Identity Card or Passport) to our Data Protection Officer at the address below. We may charge you a fee at a level permitted by the Ordinance for this service.
13. You also have the right to ask us to correct your Personal Data which you consider as inaccurate by writing to our Data Protection Officer at the address below.
14. We will allow your data access request or correction request unless we consider that there is a sound reason under the Ordinance or other relevant law to reject the request.
15. The address of our Data Protection Officer is **46/F., Manhattan Place, 23 Wang Tai Road, Kowloon Bay, Kowloon, Hong Kong.** Our Data Protection Officer's email address is [dpo@octopus.com.hk](mailto:dpo@octopus.com.hk)

## **DIRECT MARKETING**

16. We will honour your request not to use your Personal Data for the purposes of direct marketing. If you do not wish to receive direct marketing material from us, please [click here](#).

## **LINKS TO OTHER WEBSITES**



17. Our website may, from time to time, contain links to other websites. This Privacy Policy Statement only applies to this website so when you link to other websites you should read their own privacy policies.

### **CHANGE OF OUR PRIVACY POLICY**

18. We keep our privacy policy under regular review and we will place any update on this webpage. Any change, update or modification will be effective immediately upon being posted on this webpage. This Privacy Policy Statement was last updated on 5 May 2011.

### **INTERNAL PRACTICES**

19. Our Data Protection Officer is responsible for monitoring and supervising compliance with the Ordinance within the Company. We maintain the following measures to ensure compliance with the Ordinance:
- a. log books are kept to record all refusal of data access and correction requests and the reasons for their refusal;
  - b. a "Personal Information Collection Statement" is included as far as practicable in the application forms for services provided by the Company;
  - c. internal privacy Policies, Guidelines and Manuals are provided for use by staff of the Company. Such policies, guidelines and manuals will be reviewed and revised in a timely manner to meet the up-to-date privacy protection developments and standards.

### **ENGLISH VERSION**

20. If there is any inconsistency or conflict between the English and Chinese versions, the English version shall prevail.



## **CONDITIONS**



21. Nothing in this Privacy Policy Statement shall affect the Company's rights and obligations under the Terms and Conditions.