

T&C HR03

PRIVACY POLICY

1. General

This privacy policy sets out the policies and practices of the Connected Health 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.

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 related products and services, the Company will collect your personal information when you:
- (i) purchase a product from the Company through the telephone, online, in a SmarTone store (the Company’s authorized dealer) or through the Company’s authorized agents;
 - (ii) subscribe or register a service of the Company (including registration or subscription of the service at a SmarTone store (the Company’s authorized dealer), through the telephone or on-line or through the Company’s authorized agents;
 - (iii) enquire information about a product or service from the Company;
 - (iv) contact the Company with an enquiry or complaint;
 - (v) enter any promotions, competitions, prize draws through the Company’s services;
 - (vi) use the Company’s products or services; or
 - (vii) take part in market research;
 - (viii) visit or browse the Company’s websites.
- 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) 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 sale, provision, registration and administration of the Company’s related products and services (including relevant on-line services), the information that the Company collects include but is not limited to the following:
- (i) your name;
 - (ii) service installation address, correspondence address and/or billing address;
 - (iii) account details, including account numbers, service numbers or user accounts;
 - (iv) payment details including credit card information, bank account and other banking information;
 - (v) contact details, including contact name and fixed and mobile telephone number and email address;
 - (vi) your date of birth;
 - (vii) information for the verification of your identity, including identification type and identification number;
 - (viii) your preferences for particular products, services or your hobbies and leisure activities;
 - (ix) a note or recording of a call that you made to the Company’s hotlines;
 - (x) an email or letter you send to the Company; and other records of any contact you have with the Company;
 - (xi) 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;
 - (xii) data or information in connection with your health.

- 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 products and 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 and cost of such communications;
 - (ii) your searching, browsing history (including websites you visit) and location data;
 - (iii) internet PC location for broadband, address location for billing, delivery and installation.

4. Use of Customers' Personal Information

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

- (i) for the daily operation of the the Company's services provided to customers;
- (ii) conducting credit checks when required;
- (iii) designing services or products for customers' use;
- (iv) 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;
- (v) keeping you updated of the Company's latest offers or promotions;
- (vi) marketing the following products and services (in respect of which the Company may or may not be remunerated):
 - 1. all products or services by the Company;
 - 2. reward, loyalty or privileges programmes and related products and services; and
 - 3. products and services offered by the Company's business partners including travel, dining, entertainment, apparel, health and beauty, education, household, transportation, banking, insurance and other consumer products and services; and
- (vii) assisting you with any products or services enquiries, including investigating and resolving service affecting issues and dealing with any billing queries you may have;
- (viii) billing you for using the Company's products or services;
- (ix) analysing usage of products and services by you and other customers so that the Company can further improve the Company's products and services and/or better tailor the type of products and services presented to customers;
- (xi) carrying out research and statistical analysis and monitoring customer use of products and services on an anonymous or depersonalised basis;
- (xii) assisting the Company in fraud and crime prevention;
- (xiii) debt tracing, debt recovery and credit management;
- (xiv) contacting you if necessary.

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 unless the personal data is also retained to satisfy any applicable statutory or contractual obligations or for the purpose of investigation, detection and prosecution of crime.

6. Disclosure and Sharing of Personal Data

All personal data held by the Company will be kept confidential but the Company may disclose information about you to the following parties:

- (i) to the Company's parent company SmarTone Telecommunications Holdings Limited or any subsidiary companies of SmarTone Telecommunications Holdings Limited;
- (ii) contractors, agents or suppliers who are involved in delivering the products and services you have ordered or used;
- (iii) any banking or financial institutions, charge or credit card issuing companies;
- (iv) credit information or reference bureaux;
- (v) debit-collection agencies or other debt-recovery organizations;
- (vi) emergency services (if you make an emergency call), including your approximate location;
- (vii) professional advisers (which shall include lawyers and auditors);

- (viii) any agent, contractor or third party service provider who provides administrative, telecommunications, computer, payment or other services to the Company in connection with the operation of its business;
- (ix) law-enforcement or government bodies, regulatory bodies, courts or as required by law;
- (x) 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;
- (xi) third party reward, loyalty and privileges programme providers;
- (xii) 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.

7. 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.

8. 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 and products 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.

9. Your Privacy Rights

- (a) In accordance with the terms of the Personal Data (Privacy) Ordinance ("the Ordinance") and subject to exemptions specified in the Ordinance, any customer:
 - (i) has the right to check whether the Company holds personal data about him or her and has a right to receive copies of such data;
 - (ii) has the right to require the Company to correct any personal data relating to him or her which is inaccurate; and
 - (iii) has the right to 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 terms of 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
Connected Health Limited
31/F, Millennium City 2, 378 Kwun Tong Road, Kwun Tong, Kowloon, Hong Kong
Please identify yourself with your name and contact number when writing to the Data Protection Officer.

10. Privacy Policy Published @ healthreach.com.hk

This Privacy Policy is subject to change from time to time and any changes will be posted on the Company's website healthreach.com.hk

If there is any inconsistency or conflict between the version posted on the website and the previous versions, this version shall prevail.