

Statement of Rights Relating to the Use of Children's Data

Date: 31 July 2025

Service: Kids CARE

Rights as the Parent or Legal Guardian of a Child Under 18

1. To safeguard the rights and interests of your child, we expect you to ensure that your child uses the Service and submits personal information to SmarTone Mobile Communications Limited (“**SmarTone**” or “**we**”) with your consent and under your direction, as permitted under the applicable laws. To use the Service, you (as a parent or a legal guardian) have read this Statement of Rights, Children’s Privacy Notice and [Privacy Policy \(T&C B03 / H03 / 04\)](#) **and agree that we may collect personal information from your child.** If you disagree with any of the above, please do not use the Service and also ask your child to immediately cease access to the Service.
2. If you create a profile for a child under 18, SmarTone will process data about that child’s device usage (including location, website restrictions, parental control settings you set, network activity, videos watched, applications downloaded) and other data stated in the Children’s Privacy Notice. This is necessary for you and your child to utilize all the features of the Service.
3. **If you create a profile for other guardians or other adults (e.g. aunts, uncles), you have consented to their use and access of the child’s data and you must notify your child of this. If you revoke consent to process your child’s data, you will not be able to use the Service.**
4. SmarTone will not sell or rent your child’s personal data to third parties for marketing purposes.
5. You will authorize that SmarTone may introduce any child-specific features or block any messages or calls which may be suspicious to prevent your child from being exposed to harmful content.

Children’s Privacy Notice

In addition to our [Privacy Policy \(T&C B03 / H03 / 04\)](#), this privacy notice provides further details about the personal data collected by or in connection with the use of the Service by

you, any other adults and the users of the monitored device (your “child”). Where there is any discrepancy between the Statement of Rights relating to the use of Children’s Data, this Notice and the Privacy Policy, this Notice shall prevail. We reserve the right, with or without notice, to amend or update the Notice and any changes will be posted at SmarTone’s website. Your continued use of the Service after the posting of such changes indicates your acceptance to the same.

What Personal Information Does SmarTone Collect From your child?

We may collect personal information about your child, such as child’s device name (which can be any word you choose), restriction level (child’s age range) and/or month and year of birth, picture (for avatar, if chosen) and gender.

We will also collect certain information automatically from a child’s device, including location, internet or other network activity information, voice, photos, videos, certain activity (such as visited websites, online search activity, and time spent) and device information and identifiers (such as cookies, device serial numbers, and IP addresses).

How We Use your child’s personal Information

We use the information we collect to provide the Service including recommendations for your child, communicating information, enforcing parental controls, and giving parents or legal guardians visibility into how your child uses our products and services. We may use the information that is collected automatically to provide personalized content; perform analytics and troubleshoot; protect the security and integrity of the user and our services; and ensure legal and regulatory compliance.

How We Share Your children’s Information

We may share the information that we collect with our corporate group or service providers as necessary for them to support the internal operations of the Service.

How we protect your child’s personal Information

SmarTone will take steps to protect this information, we cannot guarantee the security of information transmitted through the Service. Any transmission is at the user’s own risk.

We retain your child’s personal information for at least two years after the expiry or termination of the Service, or such a longer period as required by laws. The retention periods are different depending on different criteria, such as the type of information and the purposes for which we use the information.

We may transmit the information to our servers or data centers outside of Hong Kong for storage and/or processing. Other entities with whom SmarTone may share the child's information as described herein may be located outside of Hong Kong.

Rights of a user of a monitored device over 18

If the user of a monitored device is over 18, such user must have read this Statement of Rights, Children's Privacy Notice and [Privacy Policy \(T&C B03 / H03 / 04\)](#) and agree that we may collect personal information from him. Reference to "your child" in the Children's Privacy Notice is changed the "users".