

PRIVACY POLICY (T&C B03 / H03 / 04)

1. General

This privacy policy sets out the policies and practices of SmarTone-Vodafone Group (“SmarTone-Vodafone”) in the collection, use, sharing and protection of customers’ personal information. SmarTone-Vodafone may update or change this policy and these changes will be posted in SmarTone-Vodafone’s website.

2. Collection of Customer’s Personal Information

- a) For the purpose of carrying on SmarTone-Vodafone’s business including sale, provision, registration and advertisements of SmarTone-Vodafone’s telecommunications and related products and services, SmarTone-Vodafone will collect your personal information when you:
- purchase a product from SmarTone-Vodafone through the telephone, online, in a SmarTone-Vodafone store or through SmarTone-Vodafone’s authorized dealers or agents;
 - subscribe or register a service of SmarTone-Vodafone (including registration or subscription of the service at a SmarTone-Vodafone store, through the telephone or on-line or through SmarTone-Vodafone’s authorized dealers or agents);
 - enquire information about a product or service from SmarTone-Vodafone;
 - contact SmarTone-Vodafone with an enquiry or complaint;
 - enter any promotions, competitions, prize draws through SmarTone-Vodafone’s services;
 - use SmarTone-Vodafone’s products or services; or
 - take part in market research;
 - visit or browse SmarTone-Vodafone’s websites.
- b) SmarTone-Vodafone 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) SmarTone-Vodafone may also collect information indirectly from you when you use SmarTone-Vodafone’s services including but not limited to when you:
- visit or browse SmarTone-Vodafone’s websites;
 - browse or otherwise access the Internet, WAP sites and/or the mobile internet through SmarTone-Vodafone’s services;
 - use SmarTone-Vodafone’s networks (mobile / broadband or others).

3. Types of Personal Data Collected

- a) For the purpose of carrying on SmarTone-Vodafone’s business including sale, provision, registration and administration of SmarTone-Vodafone’s telecommunications and related products and services (including relevant on-line services), the information that SmarTone-Vodafone collects include but is not limited to the following:
- your name;
 - service installation address, correspondence address and/or billing address;
 - account details, including account numbers, service numbers or user accounts;
 - payment details including credit card information, bank account and other banking information;
 - contact details, including contact name and fixed and mobile telephone number and email address;
 - your date of birth;
 - information for the verification of your identity, including identification type and identification number;
 - your preferences for particular products, services or your hobbies and leisure activities;
 - a note or recording of a call that you made to SmarTone-Vodafone’s hotlines;
 - an email or letter you send to SmarTone-Vodafone; and other records of any contact you have with SmarTone-Vodafone;
 - 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.

- b) In support of the telecommunications and other services provided by SmarTone-Vodafone, information may be automatically collected by SmarTone-Vodafone on how you use SmarTone-Vodafone's products and services, including but not limited to:
- 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;
 - your searching, browsing history (including websites you visit) and location data;
 - internet PC location for broadband, address location for billing, delivery and installation.

4. Use of Customers' Personal Information

- (a) SmarTone-Vodafone may use and analyse your information for the following purposes including but not limited to:
- carrying out a credit check to consider your application for SmarTone-Vodafone's services;
 - processing your order and providing the products that you have bought from SmarTone-Vodafone and keeping you updated with the progress of your order;
 - processing the services that you have registered;
 - keeping you updated of SmarTone-Vodafone's latest offers or promotions;
 - assisting you with any product or services enquiries, including investigating and resolving service affecting issues and dealing with any billing queries you may have;
 - billing you for using SmarTone-Vodafone's products or services;
 - responding to your enquiries or complaint in relation to SmarTone-Vodafone's products and services;
 - protecting SmarTone-Vodafone's network including managing the volume of calls, texts, data and other use of SmarTone-Vodafone's network;
 - analyzing usage of SmarTone-Vodafone's network, products and services by you and other customers so that SmarTone-Vodafone can further improve SmarTone-Vodafone's products and services and/or better tailor the type of products and services presented to you;
 - carrying out research and statistical analysis and monitoring customer use of SmarTone-Vodafone's network, products and services on an anonymous or depersonalized basis;
 - assisting SmarTone-Vodafone in fraud and crime prevention;
 - debt tracing, debt recovery and credit management;
 - contact you if necessary.

5. Retention of Personal Data

SmarTone-Vodafone will destroy any personal data it may hold in accordance with its internal policy. Personal data will only be retained for as long as SmarTone-Vodafone need 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

- (a) All personal data held by SmarTone-Vodafone will be kept confidential but SmarTone-Vodafone may disclose information about you to the following parties:
- companies in the SmarTone-Vodafone Group;
 - contractors, agents or suppliers who are involved in delivering the products and services you have ordered or used;
 - any banking or financial institutions, charge or credit card issuing companies;
 - credit information or reference bureaux;
 - debit-collection agencies or other debt-recovery organizations;
 - law-enforcement or government bodies, regulatory bodies, courts or as required by law;
 - emergency services (if you make an emergency call), including your approximate location;
 - professional advisers (which shall include lawyers and auditors).

7. Security of Personal Data

- (a) SmarTone-Vodafone has adequate measures to protect your personal information from unauthorized access, accidental loss or destruction.
- (b) If SmarTone-Vodafone has a contract with another third party organization to provide a service on its behalf, SmarTone-Vodafone will ensure they have appropriate security measures and only process your information as SmarTone-Vodafone has authorized. Those organizations will not be entitled to use your personal information for their own purposes. SmarTone-Vodafone will take reasonable steps to check these organizations to make sure that they are meeting the security requirements set by SmarTone-Vodafone.

8. Transfer of Personal Data Outside of Hong Kong

At times it may be necessary and/or prudent for SmarTone-Vodafone 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 SmarTone-Vodafone’s servers or suppliers and service providers are based outside of Hong Kong or if you use SmarTone-Vodafone’s services and products while visiting countries outside Hong Kong. SmarTone-Vodafone 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:
 - has the right to check whether SmarTone-Vodafone holds personal data about him or her and has a right to receive copies of such data;
 - has the right to require SmarTone-Vodafone to correct any personal data relating to him or her which is inaccurate; and
 - has the right to ascertain SmarTone-Vodafone’s policies and practices in relation to personal data and to be informed of the kind of personal data held by SmarTone-Vodafone.
- (b) In accordance with the terms of the Ordinance, SmarTone-Vodafone 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 and information relating to the kind of data held, may be made in writing by fax or post to:

The Data Protection Officer
SmarTone Communications Limited / SmarTone Mobile Communications Limited
P.O. Box 68864, Kowloon East Post Office, Kowloon
Fax: 3128 2266

10. Privacy Policy Published @www.smartone-vodafone.com

This Privacy Policy is subject to change from time to time and any changes will be posted on SmarTone-Vodafone’s website www.smartone-vodafone.com. If there is any inconsistency or conflict between the version posted on the website and the previous versions, the version posted on the website shall prevail.

For the purpose of this Privacy Policy “SmarTone-Vodafone Group” means SmarTone Telecommunications Holdings Limited, its holding company and any company which is a subsidiary of SmarTone Telecommunications Holdings Limited. Companies in the SmarTone-Vodafone Group shall include, without limitation, SmarTone Mobile Communications Limited, SmarTone Communications Limited.

Registered office: 31/F, Millennium City 2, 378 Kwun Tong Road, Kwun Tong, Kowloon, Hong Kong