

Privacy Policy

We are committed to providing you with the highest level of customer service. This includes protecting your privacy with respect to your personal data.

1. Introduction

S Rewards Limited (referred to in this policy as "we", "our" and "us") operates a club under the name of SmarTone Plus. This Privacy Policy provides information on our obligations and policies under the Personal Data (Privacy) Ordinance - Cap. 486 (the "Ordinance") and other applicable laws. It applies to all members of SmarTone Plus. In this privacy policy, "personal information" or "personal data" shall have their corresponding meanings under the applicable laws and regulations. Certain terms of this privacy policy are only applicable if you are located in or if you are a resident in a particular jurisdiction.

This policy explains:

- (i) What information we collect about you;
- (ii) How we collect information about you both directly and indirectly;
- (iii) The ways in which we may use and share that information; and
- (iv) How you can access or update any personal information we hold about you.

Please read this Privacy Policy in conjunction with the applicable terms and conditions of SmarTone Plus and any other product or service terms of which you have been notified.

The meaning of terms adopted in this Privacy Policy is defined in paragraph 11.

2. For the purpose of carrying on the business of SmarTone Plus including registration, management and administration of membership and other products and services (including relevant on-line products and services), rewards, loyalty and privileges programs, the personal information that we and SmarTone Plus collect includes but not limited to the following:

- (i) your name as registered on your Hong Kong Identity Card or other travel document;
- (ii) your contact details including names, telephone number, email address, correspondence address and billing address;
- (iii) information for verification of identity including your date of birth, **type of identification document, identify proof and identification number**;
- (iv) payment details for handling payment matters including **credit card, debit card and banking information**;
- (v) account details including account number, service number, user accounts, login ID, electronic device serial number, social media account information;
- (vi) your receipt or redemption of the Privileges;
- (vii) any information such as customer reviews, wish list which you may communicate through SmarTone Plus;
- (viii) a note or recording of your interactions/exchanges with our appointed service agents;
- (ix) an email or letter you send to us; and other records and any contact you have made with us;
- (x) any other information as may be required by us and/or on contractors, sub-contractors, intermediaries, agents, business partners, Merchants or representatives from time to time;
- (xi) information that you provide on an optional basis to enable us to improve our Privileges, websites and other platforms, products and services to you

such as gender, ethnicity, salary range, employment details, subscription of related products and services, education, profession, hobbies, leisure activities, family and household demographics.

SmarTone Plus will not knowingly collect personal information of minors under the age of 14. Where it is necessary for SmarTone Plus to collect personal information of such minors, we will seek the consent of their parents or guardians.

If you reside or are located in Mainland China, SmarTone Plus may process certain categories of sensitive personal information (as in bold above) in accordance with the applicable laws in Mainland China.

3. How we collect information

- (i) We collect information directly from you when you:
 - (a) provide information by phone, complete an application form or agreement to be a Member or when you submit your personal data in your membership;
 - (b) update your personal information with us;
 - (c) submit enquiries to us or contact us;
 - (d) enter any promotions, competitions or prize through SmarTone Plus;
 - (e) take part in market research;
 - (f) from third parties such as our related entities, business partners, Merchants or other customers or your representative with consent from you;
 - (g) from our records of your membership with SmarTone Plus;
 - (h) from our own records of how you use our products or services.

- (ii) We collect information indirectly from you in a number of ways including but not limited to:
 - (a) when you visit or browse our websites, mobile applications or social media accounts (e.g. WeChat public account);
 - (b) when you download or use any application from our websites, mobile applications or social medias;
 - (c) when you interact with the Merchants through SmarTone Plus such as redemption of Privileges;
 - (d) in support of the Privileges, products and services provided by SmarTone Plus, and for analysing and enhancing user experience, information may be automatically collected by SmarTone Plus or its service providers on how you use the Privileges, 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, origin and destination;
 - your browser type and version, operating system, device type and identifiers, the IP address and/or domain, URLs, searching and browsing preference and history including websites you visit;
 - information about user behaviour such as browsing pattern, duration and preference, visitor counts and statistics, preferred language, user interactions, response rates, marketing messages, offers viewed and/or redeemed, your interactive engagement activities with the Merchants of the Privileges, etc.

We may use "cookies" and other analytic technologies on your machine /device and across our websites and other platforms in order to improve their performance and enhance user experience. The information may include, but

is not limited to, relevant login and authentication details as well as information relating to your activities and preferences across on websites. You may disable cookies on your web browser but if you do so, you may not be able to access certain areas or features of our websites.

- (iii) We may also collect from you personal information of other persons (e.g. guarantors, referrers) for the purposes mentioned in this privacy policy. You shall confirm to us that you have obtained the relevant consent from such persons when providing their personal information to us.

4. How We Use Your Information

We may collect, use, retain and analyse information about you to:

- (i) provide you with membership to SmarTone Plus;
- (ii) offer you Privileges, rewards, promotions and share promotional benefits;
- (iii) process your membership with SmarTone Plus, the Privileges and loyalty programs for you;
- (iv) contact you if necessary;
- (v) verify that you are a member of SmarTone Plus for security purposes;
- (vi) assist with crime and fraud investigation and prevention;
- (vii) assist you with any of your enquiries, including the investigation and resolution of membership affecting issues and dealing with any queries you may have;
- (viii) investigate any complaints or other enquiries that you submit to us;
- (ix) provide updates, offers and invitations to events and deliver relevant advertising;
- (x) enhance the Privileges, products and services that are available to you through SmarTone Plus;
- (xi) analyses markets and product reports, perform research and statistical analysis by us and/or any other independent contractors instructed by us in order for us to improve our products and services, the Privileges and for marketing, promotional and/or business planning purposes;
- (xii) aggregate information about you to improve SmarTone Plus;
- (xiii) analyse information about you on an anonymous or aggregated basis for delivery of customized discounts, promotions, rewards, offers and other incentives to you;
- (xiv) carry out research, statistical and behavioural analysis, and monitoring and analysing customer use of SmarTone Plus, websites and other platforms, products and services on an anonymous or depersonalised basis;
- (xv) carry out market and product analysis in order to generate statistical reports and/or marketing insights which we may use ourselves or share with external companies for their own use. These reports are/or marketing insights are aggregated or anonymous and will not contain any information that identifies you; and
- (xvi) keep you informed about the Privileges, products, services, loyalty programs made available by SmarTone Plus and information concerning products and services offered by our business partners and Merchants.

5. Disclosure of your Information

- (i) All personal data held by us will be kept confidential but we may disclose information about you to the following parties to use, disclose, process or retain your personal data for the purposes mentioned and any other purposes indicated in the paragraph below:

- (a) companies in the SmarTone Group (including SmarTone Telecommunications Holdings Limited, SmarTone Mobile Communications Limited and SmarTone Communications Limited) and Sun Hung Kai Real Estate Agency Limited (operator of The Point integrated loyalty programme);
- (b) merchants that you have interacted including your redemption of the Privileges;
- (c) any agent, contractor, third party service provider or third party network service provider involved in SmarTone Plus or who provides administrative, sales, call centres, telecommunications, information technology, computer, payment, data processing, data analytics, behavioural and usage analytics, or other services to us in connection with the operation of SmarTone Plus business;
- (d) banks, hotels, insurance companies, payment service providers, billing agents and various business partners for reward redemption purpose and benefits as applicable to Members of SmarTone Plus loyalty program related events;
- (e) emergency services (if you make an emergency call);
- (f) professional advisers which shall include lawyers and auditors;
- (g) law-enforcement or government bodies, regulatory bodies, courts or as permitted or required by law;
- (h) any person to whom we are under an obligation to make disclosure under the requirements of any law binding on us or for the purposes of any guidelines issued by regulatory or other authorities with which we are expected to comply.

6. Security and Retention of Information

- (i) We maintain physical, electronic and procedural safeguards in connection with the collection, storage and disclosure of personally identifiable customer information. Our security procedure means that we may request proof of identity before we respond to your request for disclosure of personal information to you.
- (ii) If we have a contract with another third party organization to provide a service for SmarTone Plus on our behalf, we will ensure they have appropriate security measures and only process your information as we have authorized. We will take reasonable steps to check these organizations to make sure that they are meeting the security requirements set by us.
- (iii) Your information will only be retained for as long as is necessary for providing SmarTone Plus to you unless your information is also retained to satisfy any applicable statutory requirements.

7. Transfer of Information Outside of Hong Kong or your usual place of residence

At times it may be necessary for us to transfer certain personal data to other companies associated with S Rewards Limited or service providers outside of the Hong Kong Special Administrative Region ("Hong Kong") or your usual place of residence to those persons and for the purposes mentioned in this privacy policy. This may happen if our suppliers and service providers of SmarTone Plus are based outside of Hong Kong or your usual place of residence or if you access SmarTone Plus outside Hong Kong or your usual place of residence. We will take reasonable steps to ensure that your personal information is handled by such third parties in accordance with this policy. If you are located in or are a resident in Mainland China, you may contact us (by the contact methods below) for further information about the recipients (if any) of your personal information outside Mainland China.

8. Your Privacy Rights

- (i) In accordance with the terms of the Personal Data (Privacy) Ordinance ("the Ordinance") and subject to exemptions specified in the Ordinance, any Member:
 - (a) has the right to check whether we hold personal data about him or her and has a right to receive copies of such data;
 - (b) has the right to require us to correct any personal data relating to him or her which is inaccurate; and
 - (c) has the right to ascertain our policies and practices in relation to personal data and to be informed of the kind of personal data held by us.

You may have other rights in relation to your personal information under other applicable laws.

- (ii) In accordance with the terms of the Ordinance and other applicable laws, we have the right to charge a reasonable fee for processing a data access request.
- (iii) 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 to:

The Data Protection Officer
S Rewards Limited
P.O. Box 68864
Kowloon East Post Office
Kowloon

Please identify yourself with your name and contact number when writing to the Data Protection Officer.

9. Privacy Policy Published on SmarTone Plus

This Privacy Policy is subject to change from time to time and any changes will be posted on our website <https://smartoneplus.s-rewards.hk/>

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

10. Direct Marketing

- (i) We intend to use your personal data such as your contact details, including contact name, mobile telephone number, email address, delivery address, geographical data and other information such as information about the products or services you have purchased, viewed online or redeemed through SmarTone Plus so that SmarTone Plus, Merchants and/or our business partners can send you information, materials, products, offers and news about the following products and services (in respect of which SmarTone Plus may or may not be remunerated):
 - (a) All products or services by SmarTone Plus;
 - (b) Rewards, loyalty or privileges programmes and related products and services offered by the Merchants; and

- (c) Products and services offered by our business partners including networking events, sports, music, alcohol, tobacco, gaming, food and beverages, travel, dining, entertainment, betting, apparel, health and beauty products and services, fashion and accessories, electronics, social networking, technology, e-commerce, logistic, retail, home and decor, media, education, household, transportation, finance, banking, insurance and other consumer products and services that we think will be of interest to you.

We will seek your consent or indication of no objection before we use your personal data in direct marketing.

- (ii) We will honor each individual's requests not to use his/her personal data for the purpose of direct marketing. You may opt out (free of charge) from receiving direct marketing communications at any time in writing by one of the contacted methods stated in paragraph 8.

11. Glossary

- (i) SmarTone Plus

SmarTone Plus is owned and operated by S Rewards Limited. A Member of SmarTone Plus will be able to receive and/or redeem various Privileges offered by SmarTone Plus or through SmarTone Plus.

- (ii) Member

A Member is an individual who agree to the terms and conditions of the SmarTone Plus.

- (iii) Merchants

A Merchant is a business (retailers or brands) that offers rewards, privileges to Members through SmarTone Plus.

- (iv) Privileges

Privileges means any offer, privileges, rewards, discounts, products, services and/or promotions offered by the Merchants to Members through SmarTone Plus.

- (v) For the purpose of this Privacy Policy "SmarTone Group" means SmarTone Telecommunications Holdings Limited, its holding company and any company which is a subsidiary or affiliate of SmarTone Telecommunications Holdings Limited. Companies in the SmarTone Group shall include, without limitation, SmarTone Mobile Communications Limited, SmarTone Communications Limited, S Rewards Limited.

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