

PCCW Privacy Statement

Privacy Statement

This Privacy Statement is our privacy policy which sets out how we manage your personal information and other information. It applies to all our customers and individuals dealing with the PCCW Group (“PCCW”, “we”, “us” or “our”, being PCCW Limited, its subsidiaries, affiliates and associated companies but excluding members of the HKT Group (being HKT Limited, its subsidiaries, affiliates and associated companies), including without limitation, customers and users of Now TV, Now One, MOOV, Viu and Yellow Pages.

Protecting your privacy

PCCW is committed to providing you with the highest levels of customer service. This includes protecting your privacy.

Your personal data

Depending on the particular circumstances, we may collect and hold a range of different information about you. For the purpose of carrying on PCCW's business, including registration, activation, management and administration of PCCW's products and services (including virtual community, online services and payment services), loyalty programs and/or facilitating us to assist you in administrating your membership or service accounts or compliance with any laws, rules, guidelines, regulations or requests issued by any applicable courts, regulatory, governmental or other authorities, you may be requested to provide personal data such as, but not limited to, the following:

- (a) your full name as registered on your Hong Kong Identity Card or other travel document;
- (b) contact details, including name, telephone number, email address, correspondence address, billing address or proof of address;
- (c) information for the verification of identity, including date of birth, types of identification documents and identification number, for example: Hong Kong Identity Card number or passport/travel document number;
- (d) payment details, including credit card, debit card and banking information;
- (e) account details, including account numbers, service numbers, user accounts, login ID, electronic device serial number;

PCCW Privacy Statement

- (f) service installation address, correspondence address, and/or billing address;
- (g) information relating to services registered with PCCW or HKT Group at any time;
- (h) all data requested by applicable government authorities, courts, law enforcement or other authorities or regulatory bodies to enable PCCW to comply with or in connection with any law, rule, regulation, judgment or court order (whether within or outside of Hong Kong) ; and/or
- (i) any other information as may be required by any member of PCCW and/or their respective contractors, sub-contractors, intermediaries, agents, business partners or representatives from time to time.

In some instances, you may also be requested to provide, amongst other information, personal data in relation to the following areas that may be used to further improve our products and services and/or better tailor the type of information presented to you:

- (a) your age;
- (b) gender and ethnicity;
- (c) salary range and employment details;
- (d) education and profession;
- (e) hobbies and leisure activities;
- (f) subscription of related products and services; and
- (g) family and household demographics.

In most cases, provision of these types of personal data is optional. However, where the requested service is a personalised service, or provision of a product is dependent on you providing of all requested personal data, failure to provide the requested personal data may prevent us from providing that particular service to you.

Occasionally, you may need to provide personal data about other individuals to us. If so, we may require you to confirm your compliance with Part VIA of the Personal Data (Privacy) Ordinance (Chapter 486 of the Laws of Hong Kong) (the “**Ordinance**”) including your confirmation that you have informed those individuals of the use, disclosure and transfer of personal data from you to us and from us to third parties and possible disclosure of those individuals’ details (including their usage of products, services and loyalty programs of PCCW or HKT Group) by us to you; and that you have obtained those individuals’ authorisation and/or consent to such use, disclosure and

PCCW Privacy Statement

transfer (or the extent to which such authorisation and/or consent was obtained). You should also advise them that we can be contacted for further information (see “**How to contact us**” below).

Any personal data supplied by you will be retained by any member of PCCW and will be accessible by our employees and third parties (as applicable) for the purposes set out in this Privacy Statement or as otherwise indicated by prior notice to you.

How we collect personal data

We collect personal data in a number of ways, including:

- (a) directly from you, for example, when you provide information by phone, complete an application form or agreement for one of our products and/or services, or when you submit your personal data through one of our websites or mobile applications or contact us with a query or request or during the ordinary course of the continuation of our business relationship with you;
- (b) from third parties such as related entities, business partners, or other customers, or your representatives with appropriate consent from you;
- (c) from publicly available sources of information;
- (d) from our own records of how you use our products or services;
- (e) when you visit our websites (see “**PCCW Privacy Information**” below); or
- (f) when legally required to do so.

If you choose not to provide certain information about you, we may not be able to provide you with the products or services you require.

PCCW Privacy Information

PCCW's web servers may collect information relating to your online session, 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 visitors to our websites. This type of information may include, but is not limited to:

PCCW Privacy Statement

- (a) the browser type and version;
- (b) operating system;
- (c) the IP address and/or domain name; or
- (d) URLs.

Some of PCCW's websites may place a "cookie" on your machine; for example to personalise the services we provide whilst you are using our website(s) and/or maintain your identity across multiple pages within or across one or more sessions. This information may include, but is not limited to, relevant login and authentication details as well as information relating to your activities and preferences across our websites.

You can disable cookies on your web browser, however if you do so you may not be able to access all parts of our websites.

How we use your personal data

We may collect, retain and use your personal data for the following purposes:

- (a) to verify your identity;
- (b) to process your application to subscribe to products, services and loyalty programs of PCCW or HKT Group;
- (c) to provide and activate products, services, and loyalty programs of PCCW or HKT Group which you have subscribed to, including renewing your service contract, charging and billing;
- (d) matching procedures, as defined under the Ordinance;
- (e) to offer rewards and promotions and share promotional benefits;
- (f) to provide updates, offers and invitations to events and deliver relevant advertising;
- (g) to conduct appropriate checks for credit-worthiness and for fraud;
- (h) to perform research or analysis by us and/or any other independent contractors on our behalf in order for us to improve products, services and loyalty programs of PCCW or HKT Group, and for survey, marketing, promotional, behavioural scoring and/or business planning purposes;

PCCW Privacy Statement

- (i) to carry out market and product analysis in order to generate statistical reports which may be shared with external companies who are not members of the PCCW Group for their own use. These reports are aggregated and will not contain any information that identifies you;
- (j) to analyse, verify, enforce contractual rights, and/or check your credit, payment and/or status in relation to supply of goods and services to you;
- (k) to process any payment instructions, direct debit facilities and/or credit facilities in relation to supply of goods and services to you;
- (l) to maintain and develop our business systems and infrastructure, including testing and upgrading of these systems;
- (m) to keep you informed about products, services, loyalty programs made available by PCCW and HKT Group and information concerning products and services offered by business partners of PCCW and HKT Group;
- (n) to enable us to comply with any obligations to interconnect, with other industry practices, or with obligations to third parties, courts, regulatory or government agencies in relation to the supply of products, services and/or loyalty programs of PCCW or HKT Group to you; and
- (o) to assist in the prevention, detection or investigation of crime or possible criminal activities.

When we disclose your personal data

In order to deliver the services you requested, we may disclose your personal data to organisations outside of PCCW (within or outside of Hong Kong), to the extent permissible under applicable laws and regulations. Your personal data is disclosed to these organisations only for the purpose of assisting us to provide our services to you.

These organisations carry out our:

- (a) customer enquiries;
- (b) courier/delivery services;
- (c) mailing operations;
- (d) billing and debt-recovery functions;
- (e) information technology services;
- (f) installation, maintenance and repair services;

PCCW Privacy Statement

- (g) marketing and telemarketing services;
- (h) market research;
- (i) customer usage and behavioural analysis;
- (j) surveys; and/or
- (k) website usage analysis.

In some instances, we take reasonable steps to ensure that these organisations are bound by confidentiality and privacy obligations in relation to the protection of your personal data and that they use your personal data only for the above purposes, and not for their own or other purposes (including direct marketing).

In addition, we may disclose your personal data to:

- (a) your authorised representatives or your legal advisers when requested by you to do so;
- (b) for purposes of providing administrative, payment, collection, business, legal and/or operational support:
 - (i) credit-reporting and fraud-checking agencies;
 - (ii) collection agencies, security agencies, credit providers or other financial institutions (for credit related purposes such as credit-worthiness, credit rating, credit provision and financing);
 - (iii) telecommunications network operators;
 - (iv) our affiliates (which shall mean any entities which directly or indirectly control, are controlled by, or are under common control with, us), assignees, transferees and representatives;
 - (v) our professional advisers, including our accountants, auditors and lawyers;
- (c) banks, hotels, insurance companies, billing agents and various business partners for reward redemption purposes and benefits as applicable to members of loyalty programs of PCCW or HKT Group, including without limitation for purposes of registering members for loyalty program related events;
- (d) any financial institutions, charge or credit card issuing companies, credit providers, credit information or reference bureaux, collection agencies, or security agencies necessary to establish and support the payment of any services being requested;

PCCW Privacy Statement

- (e) government and regulatory authorities and other organisations, as required or authorised by law;
- (f) organisations who manage our business and corporate strategies (and for such purposes), including those involved in a transfer/sale of all or part of our assets or business (including accounts and trade receivables) and those involved in managing our corporate risk and funding functions (e.g. securitisation);
- (g) any proposed or actual participant, assignee or transferee of all or any part of the relevant member of PCCW's operations or businesses; and
- (h) charities or non-profit organisations.

Direct Marketing (if applicable)

We may also use your information (including name, contact information, phone number, residential/office address and email address and information about the products and/or services you have purchased) so that we, our related entities, dealers and other business partners (collectively, “**Service Providers**”) can promote and market products, services and special offers relating to the following products and/or services: TV, telecommunications, mobile voice, SMS and data communications, IDD/roaming, Internet connectivity, cloud services, mobile payment, entertainment, secretarial services, personal assistant services and information services (such as weather, finance or news), device accessories, mobile applications and software, computer peripheral, accessories and software (including notebooks, handsets, mobile devices and accessories, keyboards, security installations and mobile applications), reward, loyalty and privilege programmes as well as products and/or services offered by our Service Providers relating to lifestyle, networking events, travelling, banking, alcohol and tobacco, sports, music, entertainment, gaming, transportation, household, food and beverages, finance, insurance, betting, education, health and wellness, beauty products and services, fashion and accessories, electronics, social networking, technology, e-commerce, logistics, retail, home and décor, media and high-end consumer products and services that we think will be of interest to you. This marketing may be carried out in a variety of ways (including in the form of letter, bill insert, email, SMS, targeted television message, by telephone or social media or advertising on websites or other means) and may continue after you cease acquiring any products or services from us or HKT Group or opt-out from subscribing to loyalty programs of PCCW or HKT Group.

PCCW Privacy Statement

Before using or providing your information for the purposes as set out in this Privacy Statement and to the Service Providers, we may be required by law to obtain your written consent, and in such cases, only after having obtained such written consent, may we use and provide your personal data for any promotional or marketing purpose. PCCW honours each individual's request to not use his/her personal data for the purposes of direct marketing. You may opt-out from receiving direct marketing material and/or communications from the relevant member of PCCW. At the same time, you may resume receiving the same (if you have previously opted-out of receiving such material and/or communications from the relevant member of PCCW) by writing a request to our Data Protection Officer together with your registered name and service account number, registered telephone number or login name.

Transfer of personal data outside Hong Kong

At times it may be necessary and/or prudent for us to transfer certain personal data to places outside the Hong Kong for the prevention, detection or investigation of crime or in order to carry out the purposes, or directly related purposes, for which the personal data were collected. Where such a transfer is performed, it will be done in compliance with the prevailing requirements of the Ordinance.

The safety of your personal data is important to us

All reasonable efforts are made to ensure that any personal data held by us is stored in a secure and safe place, and accessed only by our authorised employees or authorised third parties referred to in this Privacy Statement.

You should be aware that no system is impenetrable and no information provided over the Internet can be guaranteed as completely secure. Accordingly, we cannot guarantee the security of any information that you transmit to us or receive from us over the Internet.

Retention of your personal data

We will destroy your personal data in accordance with our internal policy. Generally speaking, our policies cover the following principles:

PCCW Privacy Statement

- (a) personal data will only be retained for as long as is necessary to fulfill the original or directly related purposes for which it was collected, unless the personal data is also retained to satisfy any applicable legal, regulatory or contractual obligations; and
- (b) personal data are purged from our electronic, manual and other filing systems based on the above criteria and our internal procedures.

Links

Our websites (including but not limited to www.pccw.com; www.pccwsolutions.com; www.now.com; www.nowtv.now.com; www.viu.com; www.moov.hk and www.yip.com.hk) and mobile applications may contain links to other websites, webpages and mobile applications which are operated by third parties. We have no control over the content of the linked websites, webpages or mobile applications or the way in which the operators of those websites, pages or mobile applications deal with your personal data, and are not responsible for anything relating to such third party websites, webpages or mobile applications. You should review the privacy policy for those third party websites, webpages and mobile applications to understand the ways in which your personal data may be used by those third parties.

You can access your personal data

You have a right to access your personal data provided that the requested personal data is in a form in which our access to or processing of is reasonably practicable. If you are a user of My HKT, you may, by logging into your My HKT account, exercise your right of access by viewing your personal data held by us and your right of correction by editing your personal data on your My HKT account.

We may apply an administrative charge for providing access to your personal information in response to a request.

PCCW Privacy Statement

Help us ensure we hold accurate personal data

We take all reasonable precautions to ensure that the personal data we collect, use and disclose is accurate, complete and up-to-date.

However, the accuracy of that personal data depends to a large extent on the information you provide. You have a right to request correction of your personal data and we recommend that you:

- (a) let us know if there are any errors in your personal data; and
- (b) keep us up-to-date with changes to your personal data, such as your address or email address.

How to contact us

All enquiries regarding PCCW's compliance with its obligations under the Ordinance and any request for access to or correction of personal data should be made in writing to:

Data Protection Officer
PCCW Limited
GPO Box 9872, Hong Kong

Or via email to: privacy@pccw.com

This Privacy Statement may be amended from time to time and all handling of personal data will be governed by the most recent version of this Privacy Statement, available on our website at www.pccw.com/legal/privacy.html. If there is any inconsistency or conflict between the English and Chinese versions of the Privacy Statement, the English version will prevail.