

[Smart English Co. Ltd.]

Policy and Practices relating to the Personal Data (Privacy) Ordinance of Hong Kong SAR

Last updated: 25/01/2021

1. Objectives of this Privacy Policy Statement

[Smart English Co. Ltd.] is committed to protecting the privacy, confidentiality and security of the personal information we hold by complying with the requirements of Personal Data (Privacy) Ordinance with respect to the management of personal information. We are equally committed to ensuring that all our employees and agents uphold these obligations.

2. Personal Data

[Smart English Co. Ltd.] holds personal data collected for the purposes laid out in Part 3 below, and ensures that the aforementioned personal data will be handled in accordance with the provisions of the Ordinance.

a. Types of personal data that may be held by [Smart English Co. Ltd.]:

[Type of information you might obtain from customer]

- Personal data including contact name and address, fax number, telephone number and email address;
- Occupation, name of employer/school and address, employment position, number of year(s) of working experience/level of study.

b. How personal data is collected by [Smart English Co. Ltd.]

[Method of personal data collected from customer]

(i) [Smart English Co. Ltd.] may collect personal data from users when they:

- visit the [Smart English Co. Ltd.] website ([www.robineducation.com]) and all companion websites;
- participate in competitions;
- enrol for seminars, promotional events or training courses;
- sign up for any individual user account(s) or school-based account(s);

- shop at [Smart English Co. Ltd.] online store or elsewhere; and
- subscribe to the newsletter of [Smart English Co. Ltd.].

(ii) [Smart English Co. Ltd.] may conduct marketing activities to collect personal data. We may also obtain personal data from all kinds of primary research such as sales visits, personal and telephone interviews, focus group discussions, questionnaires and so on.

3. Purposes of Collecting Personal Data

Purposes for which personal data may be used include:

- sending written notifications in relation to [Smart English Co. Ltd.]’s activities, competitions, promotions and events;
 - sending written notifications in relation to the services provided under the website and other related products and services;
 - marketing of books, CD-ROMs, e-books and other related teaching and learning resources;
 - evaluation and further enhancement of the company’s products and services;
 - processing games, lucky draws and promotional events; and
- provision of on-line teaching resources and useful weblinks.

4. Use of Cookies

Some of the web pages on our website(s) contain ‘cookies’ to enhance users’ experience. Cookies are text files placed in users’ computer’s Internet browser to store users’ preferences. Cookies, by themselves, do not provide users’ email addresses or other personal data to us. We only obtain this information when users choose to provide it to our website(s). However, once users choose to furnish the website with their personal data, such data may be linked to data stored in the ‘cookies’. Most browsers are initially set to accept cookies. If users would prefer, they can set their browser to disable cookies or inform them when they are set. But if they do so, certain functionalities of our website(s) may not be available to them.

5. Retention of Personal Data

[Smart English Co. Ltd.]’s policy is to retain personal data for no longer than is required to fulfil the purpose (or any directly related purpose) for which the data is to be used, subject to legal, statutory and regulatory requirements mandating the retention of data.

6. Transfer and Disclosure of Personal Data

[Smart English Co. Ltd.] will not sell, trade or rent personal identification information to others. The personal data held by [Smart English Co. Ltd.] will be kept confidential, but [Smart English Co. Ltd.] may transfer personal data to third parties such as service providers (e.g. printer, production house, providers of mailing services, cloud servers, storage providers, or a third party who powers [Smart English Co. Ltd.]’s products) engaged by [Smart English Co. Ltd.] to process or handle personal data on our behalf.

[Smart English Co. Ltd.] will disclose personal data when required to do so by law, for example, in response to a court order or requests from law enforcement agencies or regulatory authorities, subject to a duty of confidentiality.

7. Data Access and Correction Requests

a. As a data subject, any individual has the right under the Ordinance:

to check whether [Smart English Co. Ltd.] holds any personal data, to obtain a copy of that data and to correct any data that is inaccurate. Requests for access to data or correction of data should be made in writing to:

Data Protection Officer

[Smart English Co. Ltd.]

[14/F, Tsuen Wan Industrial Centre,

220-248 Texaco Road, Tsuen Wan, N.T., Hong Kong]

[Tel:2408 8801]

b. [Smart English Co. Ltd.] will respond to such requests of access or correction within 40 days in compliance with the Ordinance.

c. A reasonable fee may be charged to cover administrative expenses for the access request.

8. Security Precautions

a. [Smart English Co. Ltd.] will use encryption for transmission of personal data and has implemented appropriate safeguards and precautions to protect the server(s) that store the personal data. Our websites have firewalls in place, which should protect the personal data collected against unauthorised or accidental access. [Smart English Co. Ltd.] will store the physical records of personal data in secured places with restricted access. While [Smart English Co. Ltd.] strives to protect all personal data, we cannot ensure or warrant the security of any information transmitted to us in any form.

b. Access to personal data is restricted to those [Smart English Co. Ltd.] employees who need to use the data and who have been trained to handle such data properly and to observe confidentiality.

c. Any person other than [Smart English Co. Ltd.] employees who has access to personal data held by [Smart English Co. Ltd.] is duty bound under an act of confidentiality to [Smart English Co. Ltd.], which has in turn undertaken to keep such information confidential.

9. Protection of Children

a. Any person who is under the age of 18 must obtain permission from parents or legal guardians before undertaking any of the following activities:

- sending any individual personal information or any information about others
- entering any contest, game or lucky draw

b. It should be noted that once permission is obtained, the user should only submit a first name or initials to be publicly posted on online and offline platforms. A full name should never be used.

10. Exemption

a. Nothing stated in this Policy shall limit the rights of any data subject under the Ordinance. However, there are certain exemptions. They include exemptions from subject access and usage limitation requirements of the Ordinance whereby their application is likely to prejudice certain competing public or social interests, such as

security, defense and international relations; prevention or detection of crime; assessment or collection of any tax or duty; news activities; and health.

b. [Smart English Co. Ltd.] reserves the right to change this Policy at any time.

Remark:

1. If there is Chinese version of this Use of Terms and the content therein (if any) has any difference with English version thereof, the English version shall prevail.