

## **Privacy Policy and Personal Information Collection Statement (the "Privacy Statement")**

Last Update: 11 August 2023

We are committed to safeguarding your privacy and ensuring that your Personal Data is protected. This Privacy Policy Statement explains the types of Personal Data we collect and how we process and protect that data.

We shall keep your Personal Data confidential and shall ensure that our policies and practices with respect to the collection, use, retention, disclosure, transfer, security and access of your Personal Data comply with the laws of Hong Kong.

### **Personal Information Collection Statement ("PICS")**

This PICS is issued pursuant to the PDPO in relation to the operation of our online business by MediConCen Limited (referred to as "we" or "us").

1. This PICS is last updated on the Effective Date.

#### 2. Definitions

Under this PICS, unless the context otherwise requires, the following words and expressions shall have the following meanings:

2.1. "Database" means the database of our customers' Personal Data.

2.2. "Effective Date" means 8 June 2022.

2.3. "Member" means a member of our communities.

2.5. "Our Customer Hotline" the hotline number(s) is available on Our Website or Our Apps.

2.6. "Our Affiliates" means Heng An Standard Life (Asia) Limited.

2.7. "Our Partners" means other merchants who offer products, services, activities, discounts, targeted offers and rewards to our Members, or advertise with us.

2.8. "Our Shop" includes MediConCen e-shop and other marketplace formats that we may operate from time to time (whether online or offline).

2.9. "PDPO" means the Personal Data (Privacy) Ordinance (Cap.486).

2.10. "Personal Data" has the meaning ascribed to it under the PDPO.

2.11. "Our Websites" all websites operated by us and including <https://hasla.mediconcen.com/>.

2.12. "Registered Customer" means our customer who has registered for an account with us.

Personal Data: what we collect and why

3. In order for you to become a Registered Customer and to enjoy our various products and services, it is necessary for you to provide us with certain essential Personal Data as indicated at the time of collection. We may also ask for other information which helps us to offer you tailored products and services that we think may be of interest to you. The types of Personal Data we may collect include your name, address, email, telephone number, date of birth, gender, age, wedding and/or anniversary dates, social media account, browsing and shopping preferences, hobbies and interest.

4. We shall have the right to collect, hold, process and/or use, the Personal Data in the Database in each case for the purposes as set out in, and in accordance with, this PICS. If you are unable or unwilling to provide us with complete and correct Personal Data, we may not be able to provide or continue to provide our products and services to you.

#### Use of your Personal Data

5. You agree that the Personal Data you provide to us and all information relating to the use of Our Apps and/or Our Websites may be used and retained by us for:

- 5.1. processing your application as a Registered Customer or a Member;
- 5.2. providing you with our services;
- 5.3. the normal management, operation, and maintenance of Our Websites;
- 5.4. providing you with regular communications from us with details of our business and relevant benefits;
- 5.5. providing you with goods or services which you have requested;
- 5.6. processing your order for purchases at Our Shop, including verifying your payment details/status;
- 5.7. carrying out prize draws, games or competitions which you have entered;
- 5.8. carrying out data sorting and analysis to enable us to better understand your characteristics and buying behaviour and to provide other services better tailored to your needs, and to assist us in selecting goods or services that are likely to be of interest to you;
- 5.9. designing new or improving existing services provided by us, Our Affiliates and/or Our Partners to you;
- 5.10. investigation of complaints, suspected suspicious transactions, and research for service improvement;
- 5.11. prevention or detection of crime;
- 5.12. disclosure as required by law; and
- 5.13. performing research, statistical analysis or surveys, whether verbally or in writing;
- 5.14. analyzing trends, usages and behaviors analysis (whether on an individualized or aggregated basis), which helps us better understand how our collective user base consumed and the underlying commercial activities conducted.

6. With your consent or indication of no objection, we will use your Personal Data for direct marketing to you (whether by post, email, phone, SMS, WhatsApp, social media or other media whether now known or available in the future) in relation to offers and promotions from:

6.1.us, Our Affiliates and/or Our Partners;

6.2.Heng An Standard Life (Asia) Limited in relation to telecommunications goods and/or services, e-commerce services (including trading platforms and online auctions), payment services, financial, investment and insurance products and services, hotel and tourism services and real property and related services;

6.3.third party merchants that we cooperate with to provide benefits to you in relation to the following types of products or services:

- a) retail goods or services;
- b) financial, investment, insurance, banking and credit cards;
- c) transportation, travel and accommodation;
- d) sports, leisure, recreation and entertainment;
- e) telecommunications products and services;
- f) e-commerce (including trading and payment platforms and online auctions).

7. We may disclose and transfer (whether in Hong Kong or abroad) your Personal Data to our agents or contractors under a duty of confidentiality to us who provide administrative, data processing, research and marketing, distribution, telecommunications, professional or other similar services to us.

8. We may also disclose and transfer (whether in Hong Kong or abroad) to any of our actual or proposed assignees or transferees of our rights with respect to your Personal Data in connection with a re-structuring of our business, and/or merger (as between us and a third party), sale, or transfer (whether of assets or shares, in whole or in part), to use, hold, process or retain such Personal Data for the purposes mentioned in clauses 5 and 6 above.

#### Browsing information collected from you (Cookies)

9. We use cookies and similar technologies to collect data about you when you visit the Our Websites and our other related websites (“Sites”). Cookies are files that store information on your computer hard drive or browser. This means we can recognise that you have visited our Sites before. We use cookies to give you the best possible experience on our Sites by evaluating the use of our Sites and reviewing your browsing and shopping habits, personalizing your website experience and evaluating website activity on our Sites, which make our Sites easier to use.

10. The types of data we may collect from you when you visit the Sites include:

- information about the type of browser you use;
- details of the web pages you have viewed;
- your IP address;
- the hyperlinks you have clicked; and
- the websites you visited before arriving at our Site.

11. You may refuse to accept Cookies (by modifying the relevant Internet options or browsing preferences of your computer system), but to do so you may not be able to utilize or activate all of the functions and services of our Sites.

#### Your rights in relation to your Personal Data

12. You have the right to:

12.1. check whether we hold any of your Personal Data;

12.2. access your Personal Data held by us;

12.3. require us to correct any Personal Data which is inaccurate;

12.4. ascertain our policies and practices (from time to time) in relation to Personal Data and the type of Personal Data held by us;

12.5. opt out from receiving direct marketing materials from us at any time; and

12.6. request for the Personal Data to be deleted.

Any request in relation to the above shall be in writing (sent by post or email) and addressed to:

Marketing Department

Units 1501-02, 15/F, Port 33, 33 Tseuk Luk Street, San Po Kong, Kowloon, Hong Kong

Email address: [bodycheck@mediconcen.com](mailto:bodycheck@mediconcen.com)

For enquiries, please contact Our Customer Hotline: (+852) 3897 4688

13. In accordance with the Ordinance, we have the right to charge you a reasonable fee for the processing of any Personal Data access request.

#### Protecting your Personal Data

14. We maintain appropriate technical and organizational measures to protect the Personal Data you provide to us against accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to your Personal Data.

15. Our Websites may contain hyperlinks to other websites provided by third parties. We do not control these third party websites or any of the content contained on those websites. Once you have left our websites, we cannot be responsible for the protection and privacy of any information which you provide. You should exercise caution and look at the privacy statement for the website(s) you visit.

#### Miscellaneous

16. Nothing in this Privacy Policy Statement shall limit your rights under the PDPO.

17. If there is any inconsistency or conflict between the English and Chinese versions of this Privacy Policy Statement, the English version shall prevail.

18. This Privacy Policy Statement shall be governed by, and construed in accordance with, the laws of the Hong Kong Special Administrative Region.

19. We may change this Privacy Policy Statement from time to time by posting an updated version on the Our Websites.

## 私隱政策及個人資料收集聲明（「私隱聲明」）

最後更新：2023 年 8 月 10 日

我們承諾保障您的私隱，並確保您的個人資料受到保護。本私隱政策聲明闡釋我們所收集的各種個人資料，及我們如何處理及保護該等資料。

我們時刻將您的個人資料保密處理，並確保有關收集、使用、保存、披露、轉移、保密及查閱個人資料的政策及常規，均符合香港法例規定。

## 個人資料收集聲明（「本聲明」）

本聲明乃按照私隱條例由醫結（下稱「我們」）就營運我們的線上業務而發出。

1. 本聲明於生效日起更新。

2. 定義

在本聲明中，除非另有說明，某些專用詞語之解釋如下：

- 2.1. 「資料庫」指儲存我們客戶個人資料的資料庫。
- 2.2. 「生效日」即 2022 年 6 月 8 日。
- 2.3. 「會員」即我們旗下各平台的會員。
- 2.5. 「我們的客戶熱線」載於我們的網站或我們的應用程式上的服務熱線號碼。
- 2.6. 「我們的聯營公司」即恆安標準人壽（亞洲）有限公司。
- 2.7. 「我們的合作夥伴」即向我們的會員提供產品、服務、活動、折扣、優惠和獎勵的商戶，或我們的廣告客戶。
- 2.8. 「我們之商店」包括「醫結電子商城」及其他由我們可能會不時地營運的其他形式的零售商店（包括線上或實體商店）。
- 2.9. 「私隱條例」指個人資料（私隱）條例（香港法例第 486 章）
- 2.10. 「個人資料」與私隱條例下「個人資料」的定義相同。
- 2.11. 「我們的網站」即我們運營的所有網站，包括 <https://hasla.medicncon.com/>。
- 2.12. 「登記客戶」即已向我們登記了帳戶的客戶。

個人資料：我們收集甚麼以及為甚麼收集個人資料

3. 要成為登記客戶並享用我們的各種產品和服務，您需要向我們提供某些必要的個人資料。我們亦可能要求您提供其他資料，以協助我們為您提供及挑選我們認為您感興趣的產品及服務。我們可能收集的個人資料類型包括您的姓名、地址、電子郵件、電話號碼、出生日期、性別、年齡、結婚日期/周年紀念日、社交媒體帳戶資料、網頁瀏覽、購物喜好及嗜好等。

4. 我們均有權收集、保管、處理及/或使用資料庫中的個人資料並按聲明中所述進行。如您不能或不願意提供全面及準確的個人資料，我們可能不能向您提供或繼續提供我們的各種產品和服務。

### 有關使用您的個人資料

5. 您同意我們可使用及保存您向我們提供的有關個人資料，及您在使用我們的網站及/或我們的應用程式的資料，以作：

- 5.1. 處理您的登記客戶或會員之申請；
- 5.2. 向您提供我們的服務；
- 5.3. 我們的網站的正常管理、運作及保養；
- 5.4. 向您提供定期信息，包括我們的業務及相關優惠的詳情；
- 5.5. 向您提供您要求的產品或服務；
- 5.6. 處理於我們之商店購買的訂單，包括驗證您的付款詳情/狀態；
- 5.7. 進行您有參與的抽獎、遊戲或比賽；
- 5.8. 進行數據排序及分析，使我們能理解您的特點及購買行為，向您提供更符合您需要的其他服務、協助我們挑選您可能感興趣的產品或服務；
- 5.9. 我們、我們的聯營公司及/或我們的合作夥伴向您設計及提供的新服務，或改善現有服務；
- 5.10. 調查投訴、備受懷疑的可疑交易及研究服務改善措施；
- 5.11. 防止及偵測罪行；
- 5.12. 根據法例作出披露；及
- 5.13. 以口頭或書面形式進行研究、統計分析或問卷調查；
- 5.14. 分析趨勢、使用情況及行為（不論個人行為分析或綜合性行為分析），幫助我們了解用戶群的消費模式以及其潛在商業活動。

6. 當取得您的同意或表示不反對的情況下，我們會使用您的個人資料在下列有關事項向您作直接促銷用途（無論通過郵件、電郵、電話、短訊、WhatsApp、社交媒體或無論現在是否已應用或將來可用的渠道）：

6.1. 由我們及/或我們的合作夥伴提供的優惠及推廣；

6.2. 由恒安標準人壽(亞洲)有限公司所經營的電訊產品及/或業務、電子商務（包括交易平台及網上拍賣）、支付服務、金融、投資及保險產品及服務、酒店及旅遊服務及物業相關服務提供的優惠及推廣；

6.3. 我們聯同第三方商戶向您提供的下列種類產品或服務優惠及推廣：

- a) 零售產品或服務；
- b) 金融、投資、保險、銀行及信用卡；
- c) 運輸、旅遊及住宿；
- d) 體育、消閒、康樂及娛樂；
- e) 電訊產品及服務；
- f) 電子商務（包括交易及支付平台及網上拍賣）。

7. 我們可能披露及轉移（無論在香港或海外）您的個人資料予向我們負有保密責任的代理人、承辦商，以向我們提供管理、數據分析、市場推廣及研究、電訊服務、專業服務或其他類似的服務。

8. 在進行我們的業務之重組及/或與我們或第三方進行合併、賣盤或轉讓（包括部份或全部資產或股權）時，我們可能披露或轉移（無論在香港或海外）您的個人資料予相關實際或建議受讓人，按本聲明第 5 及第 6 條所述的目的而使用、持有、處理或保留您個人資料。

#### 從您收集的瀏覽信息（Cookies）

9. 當您進入我們的網站和我們的其他相關網站（「這些網站」）時，我們使用 Cookies 和類似技術來收集有關您的數據。Cookies 是在您的電腦硬盤驅動器或瀏覽器上存儲信息的檔案。這意味著我們可以識別您以前曾登入這些網站。我們透過使用 Cookies 以評估您在這些網站的使用情況、瀏覽及購物習慣，個人化您的網站體驗並評估您在這些網站上的活動，從而使這些網站更易於使用，為您提供最好的體驗。



10. 當您進入這些網站時，我們可能從您那裡收集的信息類型包括：

- 有關您使用的瀏覽器類型的信息；
- 您查看過的網頁的詳細信息；
- 您的網際網路協定地址（IP 地址）；
- 您點擊過的超連結；及
- 您進入我們網站前的所瀏覽過的網站。

11. 您可通過修改電腦系統的相關互聯網或瀏覽器選項設定拒絕接受 Cookies，但您可能從而無法使用或啟動這些網站的所有功能和服務。

### 您對個人資料的權利

12. 您有權：

- 12.1. 查核我們是否持有您任何個人資料；
- 12.2. 查閱我們持有的個人資料；
- 12.3. 要求我們更正任何不正確的個人資料；
- 12.4. 查明我們就個人資料（不時）採取的政策及常規，以及我們持有的個人資料之類別；
- 12.5. 隨時要求不再接收我們發出的直接促銷訊息；及
- 12.6. 要求我們刪除您的個人資料。

如欲提出任何上述的要求，請致函下列地址：

市場部

醫結

九龍新蒲崗爵祿街 33 號 Port 33 15 樓 1501-02 室

電郵：bodycheck@mediconcen.com

如有任何查詢，請致電我們的客戶熱線：(+852) 3897 4688

13. 根據私隱條例，我們有權對查閱個人資料的要求收取合理的處理費用。

### 保護您的個人資料

14. 我們採取適當的技術和企業措施，以保護您向我們提供的個人資料，防止意外或非法銷毀、丟失、更改、披露或存取您的個人資料。

15. 我們的網站可能包含由第三方提供的其他網站的超連結。我們不能管制這些第三方網站或這些網站上的任何內容。一旦您離開我們的網站，我們不會向您的信息和隱私負上保護責任。您應謹慎行事，並查看您到訪的網站的私隱聲明。

### 其他

16. 本聲明並不限制私隱條例所保障您享有的權利。

17. 本聲明的中英文本如有歧義，概以英文本為準。

18. 本聲明受香港特別行政區法律規管，並按照香港特別行政區法律予以解釋。

19. 我們可能不時對本聲明作出更新，並將其最新版本將載於我們的網址。