

Privacy Policy

“AMIGOS By HKMC” and HKMC Premier Solutions Limited operating “AMIGOS By HKMC” (**AMIGOS By HKMC, we, our or us**) respect your legal rights to privacy and are committed to complying with the provisions of the Personal Data (Privacy) Ordinance (**PDPO**). This Privacy Policy explains our privacy practices in connection with the “AMIGOS By HKMC” mobile application (**App**), and may from time to time be revised or otherwise changed where we deem necessary. Please read the following carefully to understand our policy and practices regarding how your personal data will be handled.

In this Privacy Policy, the “**HKMC Group**” means one or more of The Hong Kong Mortgage Corporation Limited, its subsidiaries (including but not limited to HKMC Annuity Limited, HKMC Insurance Limited, HKMC Mortgage Management Limited and HKMC Premier Solutions Limited) and subsidiary undertakings, as appropriate.

Personal Information Collection Statement

Collection of Personal Data

1. We may collect your personal data directly from you (e.g. when you use or access our App) or from third parties (e.g. when members of AMIGOS By HKMC provide us with personal data about you as his/her guest for event enrolment through our App). The types of personal data collected may include (without limitation) the following:
 - (a) your personal identification and contact information (e.g. full name, month and year of birth, mobile phone number and email address);
 - (b) your interests, personal preferences or opinions (e.g. by questionnaires or surveys);
 - (c) information about your membership of AMIGOS By HKMC (**Membership**) and use of our facilities, products or services; and
 - (d) information from your use of or access to our App (e.g. behavioural information, activities/browsing history and IP addresses).
2. Failure to provide any personal data marked as “mandatory” (as specified at the time of collection) may result in us being unable to process your account registration or provide you with any offers, rewards, services, products, benefits, facilities or privileges in our App.
3. You may be required to provide the personal data of third parties (e.g. your guests) to us when you register for events, workshops, seminars or other services through our App from time to time for event or service management purposes. By providing us with the personal data relating to a third party, you represent and warrant to us that you have obtained the consent from such third party to disclose such third party’s personal data to us for the aforesaid purposes.

Use of Personal Data

4. Your personal data may be used for the following purposes:
- (a) processing your account registration in our App, and managing and maintaining your account and Membership (including verifying your identity);
 - (b) carrying out our operations and provision of rewards, services, products, benefits or privileges to you (e.g. redemption of rewards, registration of lucky draws or events, reservation of activities or facilities);
 - (c) facilitating communications and managing relationships between you and us (e.g. handling your queries, feedback or complaints, or sending event notifications or updates);
 - (d) marketing, promotional and customer management purposes, such as sending you newsletters, printed materials about educational, recreational or other events, offers and promotions (including in connection with direct marketing as detailed in paragraphs 6 and 7 below);
 - (e) conducting research and/or analysis to better understand your preferences and interests, or to design new or enhance existing offers, rewards, services, products, benefits or privileges of AMIGOS By HKMC and any member of the HKMC Group;
 - (f) exercising, defending and/or protecting the rights of AMIGOS By HKMC and, where applicable, the HKMC Group;
 - (g) detecting, investigating and preventing fraud, crime, wrongdoing or irregularity;
 - (h) complying with disclosure obligations (whether through filing or otherwise) and other requirements imposed by any applicable laws, rules, regulations, codes, guidelines, court orders of any competent jurisdiction or internal policies and practices, or as requested by any governmental, regulatory or administrative body or law enforcement authority, whether within or outside Hong Kong;
 - (i) any purpose in connection with an actual or potential assignment or transfer of any of our interests under AMIGOS By HKMC; and
 - (j) any other directly related purposes pertaining to any of the above, or other purposes agreed by you from time to time.

Disclosure of Personal Data

5. Any personal data held by us will be kept confidential but, subject to the provisions of any applicable law, we may disclose or transfer such data to the following parties (within or outside Hong Kong) for or in relation to the purposes outlined in paragraph 4 above:
 - (a) any member of the HKMC Group;
 - (b) any agent, contractor or third-party service provider which provides administrative, telecommunication, research, data analysis, data-processing, document management, storage, distribution, technology, payment, financial, mailing, printing, marketing (including direct marketing activities), advertising or public relations services or facilities or other services to support our operation;
 - (c) any business partner involved in providing the offers, rewards, services, products, benefits or privileges under AMIGOS By HKMC (e.g. third-party financial institutions and insurers and reward, loyalty, co-branding or privilege programme providers or operators) (**Business Partners**);
 - (d) where necessary, any court, tribunal or administrative, governmental or regulatory body or enforcement agency (in Hong Kong or elsewhere);
 - (e) any professional adviser (e.g. lawyers, accountants);
 - (f) any actual or potential assignee or transferee of any of our interests under AMIGOS By HKMC; and
 - (g) any person with your consent (e.g. your referrer or introducer).

Direct Marketing

6. We intend to use your personal data for direct marketing carried out by us (or by an agent on behalf of us), and for such purposes your personal data held by us may also be provided to any other member of the HKMC Group and/or our Business Partners for their use in direct marketing. The intended kinds of personal data to be used and the intended classes of marketing subjects are specified below. However, we may not so use or provide your personal data for direct marketing unless we have received your consent (or written consent where personal data is provided to any other member of the HKMC Group and/or our Business Partners for their use) (which includes an indication of no objection) for such purposes.
7. For the above direct marketing use, we intend to:
 - (a) use your name, contact information and demographic information; and

- (b) market or promote the following classes of services, products, facilities and subjects which may be offered or arranged by us, any other member of the HKMC Group and/or any of our Business Partners:
 - (i) financial, insurance, retirement planning and related services and products;
 - (ii) reward, benefit offering, loyalty, co-branding, referral or privilege programmes and related services, products and events; and
 - (iii) services and products which may be made available under any programme, service, product, facility and event under paragraph 7(b)(ii) above, including financial services, insurance and banking, real estate agency and property management, membership, entertainment, maintenance and renovation, health care and senior care, telecommunication, consumer products and services by retail outlets and/or online businesses, sports and recreation, dining, travel and accommodation, transportation and logistics, household, apparel, food and beverage, grocery, publications, education, professional advice and/or consultation and charitable initiatives.

If you do not wish us to use or provide to other persons your personal data for use in direct marketing as described above, you may exercise your opt-out right by notifying us (including by writing to us at the correspondence address specified under paragraph 15 below).

Retention of Personal Data

- 8. We maintain and execute retention policies of records containing personal data to ensure that such personal data is not kept longer than necessary for the fulfilment of the purposes for which it is or is to be used. Different retention periods apply to the various kinds of personal data collected or obtained and held by us in accordance with our internal policies on retention of personal data, and also as prescribed or permitted by applicable laws and regulations.

Use of Cookies

- 9. By using or accessing our App, you agree that we may use cookies and/or similar tracking technologies (**Cookies**) to store and track information about you and your use of our App.
- 10. Cookies are small data files which are placed on your mobile device when you access certain parts of our App. Cookies enable our App to remember you and your preferences when you use or access our App. The information collected by Cookies may include information of your mobile device, browser details, IP addresses, and your behavioural and usage patterns.

11. We may use Cookies to enhance your experience of our App, including by monitoring and analysing the effectiveness of our App, tailoring the content of our App to suit your interests, and providing you with customised advertising or promotional materials.

If you do not accept our use of Cookies, please do not use or cease using our App.

Links to Third-Party Websites

12. Our App may contain links to websites or pages which are operated by third parties. We have no control over the content of the linked websites or how the operators of those websites deal with your personal data. You should review the privacy policies applicable to those third-party websites to understand the ways in which your personal data may be used by those third parties.

Commitment to Data Security

13. We are committed to protecting the security of your personal data. We use a variety of physical, technological and organisational measures to help protect your personal data from unauthorised or accidental access, processing, erasure, loss or other use. For example, we restrict physical and electronic access to personal data on “need-to-know” and “need-to-use” bases, and have in place internal security policies and practices which require our staff to comply with the requirements of the PDPO.

Data Access and Correction Right

14. You are entitled to request access to personal data held by us about you and to correct any such data which is inaccurate. In accordance with the PDPO, we may charge a reasonable fee for the processing of any data access request.
15. You may direct your request in writing to our Data Protection Officer at the following address:

Data Protection Officer
AMIGOS By HKMC
19/F, Two Harbour Square
No.180 Wai Yip Street
Kwun Tong, Kowloon
Hong Kong

Enquiries

16. For any enquiries about our privacy policies and practices, please contact our Data Protection Officer at the correspondence address specified under paragraph 15 above.