

## **Privacy Policy Statement**

### The Club's Commitment to Protect Your Privacy

ABC Club and where applicable, each of its subsidiaries (together "the Club"; each a "Club Entity"), are committed to ensuring the privacy and security of the Personal Data they hold. The Club aims to meet this commitment by implementing the principles and requirements of the Personal Data (Privacy) Ordinance of the Hong Kong Special Administrative Region ("the Ordinance"). This Privacy Policy Statement is intended to explain the Club's privacy practices.

**For the purpose of this Privacy Policy Statement, "subsidiaries" of ABC Club refer to the "subsidiaries" of Asian Grand Prix Limited.**

### **Collection of Personal Data**

From time to time and for the purpose of carrying on the Club's businesses and operations, including the provision of services and facilities to you, you may be requested to supply data that may directly or indirectly identify you or other person(s) as an individual ("Personal Data") such as, but not limited to, the following:

1. Your name;
2. Contact details such as email address, mailing and residential address, telephone number, and fax number;
3. Membership number and details;
4. Information for verification of identity, including identification type and identification number (such as your HKID and passport number) and other related information;
5. Billing information such as your credit card number, bank account information and billing address;
6. Demographic information such as age, gender, nationality, marital status, preferences, educational background and employment history;
7. Details of transactions or competition conducted using your account.

Supply of Personal Data to the Club is non-obligatory, but failure to do so may result in the Club being unable to process your application(s) or to provide facilities and services to you.

### **Use of Personal Data**

Your Personal Data may be used for the following purposes: -

1. Providing facilities, goods, services, competition and support or performing transactions of the Club;
2. Verifying your identity;
3. Marketing and advertising of any facilities, goods and services to you by the Club and its subsidiaries, such as sending you offers and promotions (please see further details in "Direct Marketing" below);
4. Maintaining and developing the Club's business systems and infrastructure, including testing and upgrading of these systems;
5. Meeting any obligations, requirements or arrangements, whether compulsory or voluntary, of the Club to comply with, or in connection with:
  - any law, regulation, judgment, court order, sanctions regime, within or outside the Hong Kong Special Administrative Region ("Hong Kong") existing currently and in the future;
  - any guidelines, guidance, demand or requests given or issued by any legal, regulatory, governmental, tax, law enforcement or other authorities within or outside Hong Kong; or
  - any of the Club's rules or bye-laws relating to the Club's core operations.
6. Complying with any obligations, requirements, policies, procedures, measures or arrangements for sharing data and information of the Club and/or any other use of data and information in accordance with any programmes for compliance with sanctions or prevention or detection of money laundering, terrorist financing or other unlawful activities;
7. Prevention, detection or investigation of crime; and/or
8. Facilitating communications between you and the Club.

The Club may also use from time-to-time aggregate non-identifying information about its customers to better design and improve the Club's facilities, goods and services that it offers. This information will not identify any individual in particular.

### **Direct Marketing**

The Club intends to use your Personal Data for direct marketing carried out by the Club or a Club Entity (or by an agent on behalf of the Club or a Club Entity), and for such purposes your Personal Data held by a Club Entity may be provided to other Club Entities for their use for direct marketing. The intended kinds of Personal Data to be used and the intended classes of marketing subjects are specified below. However, the Club may not so use or provide your Personal Data unless exempted by the Ordinance or the Club has received your consent.

### **Disclosure of Personal Data**

Personal Data supplied to the Club will be kept confidential. However, the Club may, where such disclosure is necessary to satisfy the purpose, or a directly related purpose, for which the Personal Data was collected, provide such Personal Data to the following parties:

1. any Club Entities for fulfilling the purposes for which it was collected (subject to any consent requirement relating to "Direct Marketing" above), and to the Club's business partners for direct marketing use as described in "Direct Marketing" above;
2. any person or company who is acting for or on behalf of the Club, or jointly with the Club, in respect of the purpose or a directly related purpose for which the data was provided;
3. any other person or company who is under a duty of confidentiality to the Club and has undertaken to keep such information confidential, provided such person or company has a legitimate right to such information;
4. the Club's agents, contractors, suppliers and any third-party service provider who provides administrative, marketing and research, distribution, data processing, telemarketing, telecommunications, computer, payment or other services to the Club in connection with the operations of its business;
5. government and regulatory authorities, investigative bodies and law enforcement agencies and other organisations, as required or authorised by law;
6. any financial institutions, including banks, necessary to establish and support the payment of any services and facilities provided to you; and
7. your authorised representatives or your legal advisers when requested by you to do so.

The Club may also disclose your Personal Data to third parties: (i) when required by law, by court order or in response to a search warrant or other legally valid inquiry; or (ii) pursuant to the Club's good faith belief that disclosure is required by law or otherwise necessary to the establishment of legal claims or defences, to obtain legal advice, to exercise and defend the Club's legal rights or to protect the life, body or property of any individual. This also applies when the Club has reason to believe that disclosing the Personal Data is necessary to identify, contact or bring legal action against someone who may be causing interference with the Club's rights or properties, whether intentionally or otherwise, or when anyone else could be harmed by activities causing such interference.

The Personal Data that the Club collects or obtains may be transferred to jurisdictions that offer lesser protection of personal data than that provided in your jurisdiction. By submitting Personal Data to the Club or using any of the Club's services and facilities, you understand and consent to such transfer.

### **Links to Third Party Websites**

The Club's website may contain links to other sites and pages which are operated by third parties. The Club has no control over the content of the linked websites or the way in which the operators of those websites deal with your Personal Data. You should review the privacy policy for those third-party websites to understand the ways in which your Personal Data may be used by those third parties.

### **Data Retention**

All Personal Data that has been collected from you will only be stored for a duration that is relevant to the purpose for which it was processed and for as long as required by applicable law.

### **Commitment to Data Security**

The Club is committed to protecting the security of your Personal Data. It uses a variety of physical, technological and organisational measures to help protect your Personal Data from unauthorised or accidental access, processing, erasure or other use.

### **Changes to the Privacy Policy Statement**

The Club will post on its website at [www.asianballetcompetition.com](http://www.asianballetcompetition.com) any changes to its Privacy Policy Statement, so that you will always know what information the Club gathers, how it might use that information and whether it discloses such information to anyone.

### **Access to and Correction of Personal Data**

You are entitled to request access to Personal Data held by the Club about you and to correct such data. The Club may charge a reasonable fee for the processing of such data access requests.

You may direct your request send email to: [info@asianballetcompetition.com](mailto:info@asianballetcompetition.com)

This notice is written in English language and may be translated into other languages. In the event of any inconsistency between the English version and the translated version of this notice, the English version shall prevail.