

Hong Kong Skating School Limited
香港滑冰學校有限公司

Privacy Policy

(Last Updated 7 March 2023)

GENERAL TERMS

This Privacy Policy (“Privacy Policy”) sets out how Hong Kong Skating School Limited (the “School”, “we”, “our” or “us”) collect, use, store and handle Personal Data (as defined below).

1. Commitment to Personal Data Protection

We are committed to protecting the privacy of the personal data (“Personal Data”) we hold. To ensure that you can make informed decisions and feel confident about providing your Personal Data to us, we outline in this Privacy Policy our practices and the choices you have concerning the collection and use of your Personal Data.

2. The Personal Data We Collect

2.1. The types of Personal Data we collect from you will depend on the specific type of services and products as requested by, or provided to, you. The types of Personal Data may include (without limitation) the following:

- (a) your personal information (e.g. your name, gender, date of birth, age, education);
- (b) your contact information (e.g. telephone numbers, mailing addresses and email addresses);
- (c) your business information (e.g. company name, business title and associated contact information);
- (d) your bank account, Faster Payment System, Payme, credit or debit or other charge cards information (e.g. account number and name, name of cardholder, card number, billing address, security code and expiry date);
- (e) your experience, personal interests, preferences or comments;
- (f) your comments and responses to surveys, contests and promotional offers conducted by us or on our behalf; and/or
- (g) information when you use our websites or other services or products (e.g. behavioural information, purchasing history, location information, browser details, IP addresses).

2.2. Certain Personal Data (e.g. relating to your personal information and contact information) are required for specific services and if you fail to supply such Personal Data as requested from each specific service, we may not be able to deliver you the services or products. By providing your Personal Data to us, you acknowledge that such provision is fair and reasonable in the circumstances.

3. Purposes for which your Personal Data are Collected and Used

3.1. The purposes for which your Personal Data are collected and used may include (without limitation) one or more of the following purposes:

- (a) for the supply of any services, products, facilities and/or other subjects (together, the “Services”) which we may offer to you, or you may require from us, from time to time;

(b) for transaction and payment purposes for any of the Services of the School, including verification of credit card details with third parties;

(c) for use of our online Services available at any of the websites of Hong Kong Skating School Limited and/or through other telecommunication or social media channels;

(d) for identification and verification purposes in connection with any of the Services that may be supplied to you;

(e) for administrative purposes and registering for Services, events and activities with or through us;

(f) for communicating with you by email, mail, phone, whatsapp or other means, including contacting you regarding your enquiries;

(g) for designing new and/or enhancing existing Services, programs, activities, contests, lucky draws, promotions and/or other events (together, the "Activities") and/or administering any of the Activities conducted by the School

(h) for managing customer relationship

(i) for making disclosures when required by law, regulation, or court order of any jurisdiction and/or as requested by any government, regulatory or law enforcement authority or administrative organisation, which may be within or outside the Hong Kong Special Administrative Region of the People's Republic of China ("Hong Kong");

(j) for establishing legal claims or defences, obtaining legal advice, and/or exercising, defending and/or protecting the rights or properties of Hong Kong Skating School, including identifying, contacting or bringing legal action against any person who may be causing interference with such rights or properties (whether intentionally or otherwise) or where any other person could be harmed or property of any other person could be damaged by such interfering activities;

(k) for handling and following up with your comments, suggestions, enquiries, requests and/or complaints to/against the School;

(l) for conducting investigations, research and/or analysis with regards to incidents, activities and/or events occurred in relation to the School

With your consent:

(m) for direct marketing or promoting any of the Services of Hong Kong Skating School Limited (e.g. sending you updates on our latest programs, offers and promotions in relation to any of our Services from time to time). Please see further details in "5. Direct Marketing" section below;

(n) for conducting surveys, research and/or analysis from time to time to better understand your preferences, interests, experiences and/or habits;

(o) for promoting and soliciting donations or contributions for charitable or not-for-profit making causes;

- 3.2. We will not knowingly or intentionally use, share or sell your Personal Data in ways which are unrelated to the above purposes without your prior consent.

4. Disclosure and Transfer of Personal Data

- 4.1. To facilitate the purposes mentioned under "3. Purposes for which your Personal Data are Collected and Used" Section, we may transfer, disclose, grant access to or share your Personal Data with third parties located within or outside Hong Kong, and your Personal Data may be transferred within or outside Hong Kong. These third parties may include the following:
- (a) any agent, contractor, or third-party service provider who provides administrative, marketing, research, distribution, data processing, telemarketing, telecommunications, computer, payment or other services to or support the operation of the School's business (including its/their direct marketing activities);
 - (b) other business associates and vendors such as ice rinks and other companies involved in performing tasks on our behalf such as providing customer service, fulfilling customer requests or participant registration;
 - (c) credit reference agencies, credit, debit and/or charge card companies and/or banks;
 - (d) medical professionals, clinics, hospitals, insurers and/or loss adjusters;
 - (e) any person, government, regulatory or law enforcement authority or administrative organisation;
 - (f) any person under a duty of confidentiality to the School (including auditors, accountants, legal advisers or other advisers);
 - (g) any actual or proposed assignee or purchaser of all or any part of the business and/or asset of Hong Kong Skating School Limited; and/or
 - (h) charitable or non-profit making organisations.
- 4.2. We may also share information or statistics with third parties in an aggregated or anonymised form that does not directly identify you (e.g. we may share aggregated information about your preferences and location with advertisers for marketing purposes).
- 4.3. The Personal Data you provide to us may also be sourced from or transferred to other jurisdictions outside Hong Kong for the purposes mentioned above.

5. Direct Marketing

- 5.1. In connection with direct marketing, we intend:
to use your Personal Data including name, age, address, telephone numbers, email and other contact or customer profiling information collected for (i) marketing of services, activities, events, programs, products, collaborations with ice rinks, sport companies/associations, brands, contests, lucky draws, promotions, blogs or newsletters (ii) conducting customer and service surveys (iii) to promote or solicit donations or contributions for charitable or non-profit making causes that is of benefit to the community.
Information may be sent to you by email, mail, phone, SMS, whatsapp or other means.
- 5.2. You may opt out of receiving direct marketing communications at any time, free of charge, by emailing learn@hkskatingschool.com to tell us that you no longer wish to receive our direct marketing communications.

6. Use of Cookies and Log Files

- 6.1. If you visit any of our websites, we may use cookie files to store and track information about you and your preferences. A cookie is a small text file that our website transfers to your computer's or device's hard disk. We use cookies to better serve you and/or maintain your information across multiple pages within or across one or more sessions. Most web browsers automatically accept cookies, but if you prefer, you can edit your browser options to block them in future. However, if you disable cookies or refuse to accept a request to place a cookie, certain functionalities on our websites may not be available.
- 6.2. Cookies contain information about you and your preferences. For example, if you inquire about rates and availability, the site might create a cookie that contains the details you entered. Or it might only contain a record of which pages within the site you visited, to help the site customise the view for you the next time you visit.
- 6.3. Only the information that you provide, or the choices you make while visiting a website, can be stored in a cookie. For example, the site cannot determine your email name unless you choose to type it. Allowing a website to create a cookie does not give that or any other site access to the rest of your computer, and only the site that created the cookie can read it.
- 6.4. We may also collect information regarding your IP address, browser type, domain name and access time. This information is used for our own research purposes. As it is not linked to any personal information, it is separate from your Personal Data. In rare instances, IP addresses may be used to assist in deterring and/or preventing abusive or criminal activity on the website.
- 6.5. If you interact with us on social media platforms (for example if you "Like" our Facebook Page or post on our timeline), we can interact with you and send you messages via these platforms. We will interact with you in accordance with the social media platform's rules but we are not responsible for how the platform operators collect and handle your Personal Data. We are not responsible for what third parties post on our social media accounts.

7. Data Retention

Subject to any legal, statutory, regulatory or accounting requirements, the Personal Data you provide to us will be kept by us in the appropriate form only for as long as is necessary to fulfil the purposes mentioned above after which it will be destroyed.

8. Other Websites

- 8.1. In order to anticipate your needs, our websites may contain links to third party sites that are operated under different privacy practices.
- 8.2. All such websites are independent from our websites. We have no control over the contents of such other websites or their privacy policies or compliance with the law. You should therefore be fully aware the provision of such links do not constitute an endorsement, approval, or any form of association by or with Hong Kong Skating School Limited. We have no control over Personal Data that is submitted to these other websites.

You should remain alert when you leave our websites, and read the privacy statements of other websites.

9. Contact Us

Please do not hesitate to contact us if you have any questions, comments or concerns about this privacy policy. You have the right to tell us if you:

- Do not want to be contacted in the future by us
- Would like to find out what information we have about you, would like a copy of the Personal Information which we hold about you
- If you think that any Personal Information we hold about you is inaccurate, incomplete, out-of-date or irrelevant
- Wish to report any breaches of the privacy policy

The School may take reasonable steps to verify your identity before granting access or permitting corrections to your information. In accordance with the terms of the Ordinance, the School has the right to charge a reasonable fee for the processing of any data access request.

If you have any questions or complaints about this privacy policy, please contact us by email at learn@hkskatingschool.com

We will investigate any complaint, and notify you of our decision in relation to the complaint, as soon as practicable after it is received.

10. Updates to this privacy policy

We may change this privacy policy. Any changes to this privacy policy will become effective when we post the revised privacy policy on a site. Your use of the sites following these changes means that you accept the revised privacy policy.