

## Personal Information Collection Statement ("PICS")

### 1. Your Privacy

MTR Corporation Limited ("**MTR Corporation**", "**we**", "**our**" or "**us**") and our subsidiaries and affiliates respect your legal rights of privacy when collecting, storing, using and transmitting personal data and this PICS explains our privacy practices. It is our policy to comply with the requirements of the **Personal Data (Privacy) Ordinance** (Cap. 486) of the Laws of the Hong Kong Special Administrative Region and all related codes of practice and guidance notes issued by the Privacy Commissioner, and where applicable the Law no. 8/2005 (Personal Data Protection Law) of the Macau Special Administrative Region, the laws and regulations regarding data protection of the People's Republic of China, the Australian Privacy Act 1988 (Cth) (the "**Australian Privacy Act**") (including the Australian Privacy Principles set out in the Australian Privacy Act), and any other applicable privacy laws and related regulations and codes of practices and guidance. In some circumstances, depending on the nature of our processing of your personal data, we may be required to comply with additional data protection laws, such as the United Kingdom Data Protection Regulation (the "**UK GDPR**"), the United Kingdom Data Protection Act 2018, or the EU General Data Protection Regulation 2016 ("**EU GDPR**") and national legislation that implement(s) or supplement(s) the same. In doing so, we will ensure compliance by our staff with the strictest standards of security and confidentiality. MTR Corporation Limited is the data controller for your personal data processed in connection with MTRconnects (as defined in the Terms of Use). If you have questions about our processing of your data, please contact us using the contact information under Section 6 below.

Please read the following carefully to understand our policy and practices regarding how your personal data will be treated. This policy may from time to time be revised, or otherwise changed where we deem necessary but we will give you advance notice of any such revision or change.

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

Subject to applicable data protection laws, "**personal data**" means any personally identifying information or data (such as names, titles, email addresses, departments, divisions, office locations, photos, videos, device name, etc.) from which it is practicable for the identity of an individual to be ascertained directly or indirectly.

### 2. Purposes for which we will use your Personal Data

We collect your personal data when you proceed to register, log-in, use or access the Website (including MTRconnects) (as defined in the Terms of Use).

If you are under the age of 18, you must have a legal representative such as a parent or guardian accepting this Policy on your behalf before providing any Personal Data to us.

Your personal data will be collected and used for the following purposes:

- (a) processing your application, registration, termination and continuation for access to the Website;
- (b) arranging your registration, log-in, use and/or access to the Website and associated purposes, including but not limited to souvenir distributions;
- (c) handling and following up service calls, enquiries and complaints;
- (d) verification of your identity;
- (f) meeting the requirements to make disclosure to any governmental authority in Hong Kong and all other relevant jurisdictions under the requirements of any law binding on MTR Corporation; and
- (g) creating, maintaining and/or operating the Website, including performing data analytics and reporting.

If you fail to supply the personal data required, we may be unable to allow your use and/or access to the Website.

In most cases, we will process your personal data because it is necessary for us to perform our contract with you. In other cases, we may need to process your personal data for our legitimate interests, namely efficient operation of the Website and our business.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

### **3. Disclosure**

In cases where we do collect personal data from you, we will:

- (a) tell you (by way of this PICS or by a separate notification) that we are doing so and the use that we will make of such personal data we collect;
- (b) where relevant, ask for your consent or give you the opportunity to object to a particular use of your personal data; and

- (c) tell you how we will store your personal data and how you can review, change and delete the personal data we have stored.

It is not a condition of your contract that you agree to any request for consent from us, and you would have the right to withdraw consent at a later date if you wanted to.

We will take all practicable steps to keep your personal data confidential but we may disclose, transfer (with the possibility of such transfer being made to a jurisdiction outside of where you live) and/or assign such data to the following parties:

- (a) any other users or entities who have the rights to use and/or access the Website (in this regard only name, title, email, department, division and photo will be disclosed, transferred and/or assigned);
- (b) if MTR Corporation decides to sell any relevant part of its business, to any actual or proposed assignee, transferee or successor of or to MTR Corporation's rights in respect of your personal data;
- (c) any agent, contractor or third party service provider who provides administrative, telecommunications, computer and other services to MTR Corporation with respect to the operation of its business;
- (d) any person to whom MTR Corporation is under an obligation to make disclosure under the requirements of any law binding on MTR Corporation or for the purposes of any guidelines or codes of practice issued by regulatory or other authorities with which MTR Corporation is expected to comply.

To the extent that any international transfers of personal data are made in connection with the operation of the Website, this will always be done in accordance with applicable data protection laws.

#### **4. Security**

Except as mentioned in paragraph 3 above, your personal data, however stored, will be accessed only by our employees or contractors who are authorised to do so, and who are bound by professional secrecy, even after termination of their functions. Where personal data is stored electronically, it will be kept on a secured server and will be password-protected (or under some equivalent form of protection) and accessible only by authorised personnel of MTR Corporation or its contractors. Employees and contractors designated to handle personal data will be instructed to do so only in accordance with this PICS.

#### **5. Use of Personal Data in Legal Proceedings**

If it becomes necessary that we have to take action against you for any reason whatsoever including recovering from you any money you owe us, you expressly agree that the personal data provided by you can be relied upon in identifying and taking legal action against you, subject to applicable data protection laws.

## **6. Your Right to Access and Correction**

You may at any time request access to and to correct personal data relating to you in any of our records. You may also ask us to delete you or your personal data from any active mailing or distribution list, as well as oppose to your data being processed, or withdraw your consent at any time. To exercise any of your rights, contact us at the address or email below, marking your communication "Confidential". In response, we may ask you to provide certain details about yourself so that we can be sure you are the person to whom the data refers. We will respond to your requests within the time period permitted under applicable law, and we may charge you a reasonable fee for doing so if permitted under applicable law.

If your personal data is protected by the UK GDPR or the EU GDPR, then you have the following additional rights in relation to the personal data that we hold about you:

- you can ask what personal data we hold about you and be provided with a copy;
- you can ask us to delete or cease processing the personal data that we hold about you, in certain circumstances;
- you can ask us to send you, or another organisation, certain types of personal data about you in a format that can be read by a computer; and
- you can withdraw your consent to us processing your personal data, where our processing is based on your consent.

## **7. Personal Data Privacy Officer**

The person to whom (1) requests (i) for access to data or correction of data, (ii) for general information regarding our policies and practices with respect to personal data and (iii) about the kinds of personal data that we hold and (2) general questions and complaints should be addressed is as follows:

### **MTR Corporation Limited (as data controller)**

Personal Data Privacy Officer

Legal-General Department

(Marked Confidential)

Address : MTR Headquarters Building  
Telford Plaza  
Kowloon Bay  
Kowloon  
Hong Kong

Email : PDPO@mtr.com.hk

Phone : +852 2993-8524 (MTRconnects Support)

Depending on applicable data protection laws, you may have the right to complain to a relevant supervisory authority, i.e. the supervisory authority in the country where you work or reside or where you believe an infringement has taken place.

## **8. Retention of Data**

We will keep your personal data only for as long as necessary to fulfill the purpose for which the data was collected and, in any event, only for as long as relevant data protection laws and our internal rules and policies allow. We may also retain archived personal data for statistical purposes.

Personal Data which is no longer required will be destroyed.