

Privacy Policy Statement ("PPS")

1. Your privacy

MTR Corporation Limited ("MTRCL", "we ", "our " or "us") and our subsidiaries and affiliates respect your legal rights of privacy when collecting, storing, using, processing and transmitting Personal Data and this PPS explains our privacy practices. We are legally required to comply with the Personal Data (Privacy) Ordinance (Cap. 486) of the Laws of the Hong Kong Special Administrative Region, and where applicable the Law no. 8/2005 (Personal Data Protection Law) of the Macau Special Administrative Region, and 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, when collecting, holding, using and/or processing your Personal Data. 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"), including national legislation that implement(s) and/or supplement(s) the same (together with the aforementioned laws, the "**Privacy Laws**"). In doing so, we will ensure compliance by our staff to 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 Personal Data, please contact us using the contact information under Section 13, below.

Please read the following carefully to understand our policy and practices regarding how your Personal Data will be collected, treated and processed. By proceeding to register, log-in, use or access the Website (including MTRconnects) or providing your Personal Data to us, you confirm that you have read and agree to this PPS and the relevant Personal Information Collection Statement(s) ("PICS") and the collection, use, transfer, storage and processing of your Personal Data as described in this PPS.

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.

If there is any inconsistency between the English and Chinese version (Traditional and Simplified) of this PPS, the English version shall prevail.

Terms not defined herein will have the same meaning as those in the Terms of Use governing your use of this Website unless specified to the contrary.

2. Collection of Personal Data

If you proceed to register, log-in, use or access the Website, we may collect two basic types of data from you and/or your employer, "Personal Data" and "Non-Personal Data":

Subject to applicable data protections laws, "Personal Data" means any personally identifying data which we may collect from you and/or your employer when you proceed to register, log-in, use or access the Website and include without limitation names, photo, video, title, email address, division, department, location of hub, device name, IP address, geolocation information, from which it is practicable for the identity of an individual to be directly or indirectly ascertained.

"Non-Personal Data" includes anonymous, aggregate and/or automatic information, which is data collected about your use of the Website, or about a group or category of users from which Personal Data has been removed. This PPS does not restrict or limit our collection, use and provision of Non-Personal Data.

2.1 Personal Data

The following are the common situations when we may collect and store your Personal Data, although these situations are not exhaustive:

- Registration at or use of the Website
- Log-in and access to the Website
- Posting, uploading, creating or otherwise generating directly or through/by other persons or entities any content and/or information, including any artistic, musical, literary, sound recording, film, photo and/or any type of work on our Website.

2.2 Non-Personal Data

When you use the Website, we may keep an activity log that does not identify you individually and cannot be used to identify the identity of any particular user. Generally, we collect and store the following categories of Non-Personal Data:

- information about the device that you use to access our websites or leave comments on the contents. This information may include operating system and version, the type of network and mobile Internet browser you use, the browser's type and configuration and other unique device identifiers of the device, browsing preferences such as language settings and font size etc.; and
- information about your use of the Website including without limitation the domain names you visit and the specific actions you take on the Website, the number of new or returning visits, statistics on the pages visited and referred, a reading history of the pages and sites you have visited and viewed, search terms used and search results, error and crash statistics, traffic data (such as time, duration and date of access).

The above Non-Personal Data are collected and used to measure traffic, gauge the popularity of various parts of the Website, to gain general knowledge about our audience. We may also share

to third parties (including without limitation to those specified under paragraph 4 below) these Non-Personal Data for customizing, enhancing, optimizing, maintaining and/or improving the quality of our Website, such as for determining the optimal screen resolution, language and font settings, etc. This Policy in no way restricts or limits our collection, use, handling and provision of Non-Personal Data.

3. Purposes for which we will use your Personal Data

The purposes for which we may use your Personal Data will be stated in this PPS and/or a PICS, application form, terms and conditions and/or webpage relevant to your provision of Personal Data to us. Broadly, your Personal Data will be used in order to provide you with access to the Website, and to allow us to host content on the Website which may include your Personal Data. 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.

4. Disclosure and Transfer of Personal Data

In cases where we do collect Personal Data from you, we will:

- tell you (by way of a PICS or by a separate notification) that we are doing so and any purpose of use that we will make of such Personal Data we collect; and

- where relevant, ask for your consent or give you the opportunity to object to a particular use of your Personal Data.

- 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 (for example, you could at any time indicate that you do not wish for us to use your photograph for any of the purposes outlined above).

5. We will take all practicable steps to keep your Personal Data confidential but we may disclose, transfer and/or assign such data to the following parties:

- any other users or entities who have the rights to use and/or access the Website, and who may be located in Hong Kong, the Mainland of China, Macau or elsewhere overseas.

- if MTRCL decides to sell, merge and/or re-organise any part of its business, to any actual or proposed assignee, transferee or successor of or to MTRCL's rights in respect of your Personal Data;

any agent, adviser, auditor, contractor or third party service provider who provides administrative, telecommunications, computer, payment, fraud prevention, insurance, data processing and/or other services to us in connection with the operation of our business and/or the relevant product(s) and/or service(s) that you seek from us, and/or who otherwise processes Personal Data for and on our behalf; and

any person (including without limitation government authorities, regulatory or administrative bodies or law enforcement agencies) to whom MTRCL is under an obligation to make disclosure under the requirement of any law binding on MTRCL or for the purposes of any guidelines or codes of practice issued by regulatory or other authorities with which MTRCL is expected to comply, or such parties who are authorized by law to request information from MTRCL.

6. We may also disclose and/or transfer your Personal Data in the manner as stated in the Personal Information Collection Statement and/or any terms and conditions relevant to the product(s) and/or service(s) you seek from us.
7. The parties to whom we disclose and/or transfer your Personal Data may be situated outside of Hong Kong or where you live where there may not be in place data protection laws which are substantially similar to, or serve the same purposes as, the Privacy Laws. In all cases, by providing your Personal Data to us or using the Website, you consent to the disclosure of your Personal Data outside of your country of residence, and acknowledge that MTRCL is not required to ensure that overseas recipients handle your Personal Data in compliance with the Privacy Laws. However, where practicable in the circumstances, we will take reasonable steps to ensure that overseas recipients use and disclose such personal data in a manner consistent with this PPS.
8. For the avoidance of doubt, 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.

9. Links to Other Websites

If you use our Website, there may be advertisements or hyperlinks linking to another website (e.g. Linked Sites). If you click on any of these advertisements or hyperlinks, you will leave our Website for another location. At any other website, the protection of your privacy, Personal Data and your exposure to cookies are not our responsibility and you are advised to refer to the privacy policy of that other location (if any).

Our Website may allow you to link and/or connect to third party social networking sites. If you choose to link and/or connect to these third party social networking sites, we may be able to collect certain Personal Data from your social networking profile provided to us by the social networking site. In that case, we will collect and use such Personal Data only for the purpose of providing you with the connection to the social networking site.

10. Cookies

Our Website uses Experience Analytics, a web analytics service provided by the platform vendor SiteCore to perform analytics report. Experience Analytics uses "cookies" to help our websites analyze how users use those websites. A cookie is a small text file that is stored on your device (e.g. on your computer) when you visit or access a website. A cookie can be used to identify a computer or a mobile device. It, however, is not used to collect any personal information and does not recognize you personally. In other words, it does not have the purpose or function of identifying an individual user of our Websites.

Within our Website cookies are used to track the use of and monitor traffic on our Website, as well as to improve, customize and enhance your browsing experience, for example:

Strictly necessary cookies are used to indicate your active using of our Website and remember the information you've entered in a form or details about a payment you want to make. Without them, the information would be lost every time you move to a new page;

Performance cookies are used to collect anonymous information about how you use our Website, such as which pages you visit on our Website. We use this aggregated information to improve our Website; and

Functional cookies are used to record information about choices you've made and to recommend contents of our Website that are relevant to you and your interests.

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

Cookie	Name	Purpose	More information
SC_ANALYTICS_GLOBAL_COOKIE	SC_ANALYTICS_GLOBAL_COOKIE	Sitecore's analytics cookie. Stores an ID that represents the device (issued by Sitecore) and a true/false value indicating whether visitor classification was guessed (robot or not robot). Used by the tracker to identify a returning contact.	https://doc.sitecore.com/en/developers/93/platform-administration-and-architecture/cookies-used-by-sitecore.html
ASP.NET_SessionId	ASP.NET_SessionId	The default ASP.NET session ID cookie.	https://doc.sitecore.com/en/developers/93/platform-administration-and-architecture/cookies-used-by-sitecore.html

__RequestVerificationToken	__RequestVerificationToken	The default ASP.NET anti-XSRF cookie.	https://doc.sitecore.com/en/developers/93/platform-administration-and-architecture/cookies-used-by-sitecore.html
{website}#lang	{website}#lang	Stores context language of the current site.	https://doc.sitecore.com/en/developers/93/platform-administration-and-architecture/cookies-used-by-sitecore.html

We do not control these cookies and you should check the relevant third-party website to see how your information is used and how to opt-out.

We do not control these cookies and you should check the relevant third-party website to see how your information is used. For the avoidance of doubt, no cookies will be used on you unless and until you have actively accepted the cookies on a cookie by cookie basis, after which you may choose to reject all or some cookies at any time by changing the setting of your web browser on your device. Please visit www.allaboutcookies.org to find out how to manage cookies. However, please be aware that if you choose to delete or restrict cookies, you will not be able to use some or all of the functions of our Website.

11. Security and Storage

Except as mentioned in paragraphs 4 and 5 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 encrypted and/or password-protected (or under some equivalent form of protection) and accessible only by authorised personnel of MTRCL or its contractors. The network transmission of Personal Data will also be protected by using the SSL protocol. Personal Data are treated as confidential information by MTRCL and all employees and contractors designated to handle Personal Data will be instructed to do so only in accordance with this PPS.

12. 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.

13. Your right to access and correct Personal Data

You may at any time request access to and 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 complying with any data access request 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.

14. Personal Data Privacy Officer

Any 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/or general questions and complaints relating to this PPS should be addressed to the person below:

MTR Corporation Limited (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 the 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 and infringement has taken place.

15. Retention of Personal Data

Personal Data provided by you are retained for as long as the purposes and any directly-related purposes for which such data were collected continue and, in any event, only for as long as relevant data protections laws and our internal rules and policies allow.

This PPS is subject to change. Any changes will be posted on this page. Your continued use of our websites and/or mobile applications after the posting of such changes indicates your acceptance to the same.

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