

## **PRIVACY POLICY**

### **1. General**

This privacy policy sets out the policies and practices of Birdie Mobile Limited ("Birdie") in the collection, use, sharing and protection of customers' personal information. Birdie may update or change this policy and these changes will be posted in Birdie's website.

### **2. Collection of Customer's Personal Information**

- a) For the purpose of carrying on Birdie's business including sale, provision, registration and advertisements of Birdie's products and services, Birdie will collect your personal information when you:
  - (i) purchase products or services from Birdie (including purchase through on-line or Birdie's authorized dealers or agents);
  - (ii) enquire information about a product or service from Birdie;
  - (iii) contact Birdie with an enquiry or complaint;
  - (iv) enter any promotions, competitions, prize draws through Birdie's services;
  - (v) use Birdie's products or services; or
  - (vi) take part in market research;
  - (vii) visit or browse Birdie's mobile app or websites.
- b) Birdie may also collect information about you from other organizations including general business directories and credit information or reference bureau necessary to establish and support the payment of any services being requested by you.
- c) Birdie may also collect information indirectly from you when you use Birdie's services including but not limited to when you:
  - (i) use Birdie's mobile app or browse Birdie's websites;
  - (ii) browse or otherwise access the Internet, WAP sites and/or the mobile internet through Birdie's services;

### **3. Types of Personal Data Collected**

- a) For the purpose of carrying on Birdie's business including sale, provision, registration and administration of Birdie's products and services (including relevant on-line products and services), the information that Birdie collects includes but is not limited to the following:
  - (i) your name;
  - (ii) delivery address;
  - (iii) payment details including credit card information, bank account and other banking information;
  - (iv) contact details, including contact name and mobile telephone number and email address;
  - (v) your preferences for particular products, services or your hobbies and leisure activities;
  - (vi) a note or recording of a call that you made to Birdie's hotlines;
  - (vii) an email or letter you send to Birdie; and other records of any contact you have with Birdie;
  - (viii) your account information, such as dates of payment, top-up/ purchase Day Pass information and any other information relating to your account.
- b) In support of the products and services provided by Birdie, information may be automatically collected by Birdie on how you use Birdie's products and services, including but not limited to:
  - (i) the telephone numbers and/or email addresses of calls, texts, MMS, emails and other communications made and received by you and the date, duration, time, origin and destination and cost of such communications;
  - (ii) your browser type and version, searching and browsing history (including websites you visit), IP address and location data;

Birdie may use cookies across its websites in order to improve their performance and enhance your online experience. You may disable cookies on your web browser but if you do so, you may not be able to access certain areas or features of our websites.

- c) In certain situations, you may need to provide personal data of other individuals to Birdie, for example, for "send-a-friend" promotions or "Member-get-member" promotion. By providing Birdie with such personal data, you represent to Birdie that you have obtained those individuals' authorisation and/or consent to the use, disclosure and transfer of personal data from you to Birdie and from Birdie to third parties and possible disclosure of the individual's details (including information on service usage) by Birdie to you.
- d) If you choose not to provide your personal data, Birdie may not be able to provide you with its products or services or carry out the activities mentioned in this policy.

#### 4. **Use of Customers' Personal Information**

Birdie may use and analyse your information for purposes including but not limited to:

- (i) the daily operation of Birdie's services;
- (ii) processing your order and providing the products and services that you have bought from Birdie and keeping you updated with the progress of your order;
- (iii) keeping you updated of Birdie's latest offers or promotions;
- (iv) marketing products and services (in respect of which Birdie may or may not be remunerated) in the manner set out in the "Direct Marketing" section below.
- (v) assisting you with any products or services enquiries, including investigating and resolving service affecting issues and dealing with any billing queries you may have;
- (vi) billing you for using Birdie's products or services;
- (vii) protecting Birdie's network service provider including managing the volume of calls, texts, data and other use of Birdie's network service provider;
- (viii) analysing usage of Birdie's mobile app, products and services by you and other customers so that Birdie can further improve Birdie's products and services and/or better tailor the type of products and services presented to customers;
- (ix) carrying out research and statistical analysis and monitoring customer use of Birdie's mobile app and Birdie's network service provider, products and services on an anonymous or depersonalised basis; assisting Birdie in fraud and crime prevention;
- (x) debt tracing, debt recovery and credit management;
- (xi) contacting you if necessary.

#### 5. **Retention of Personal Data**

Birdie will destroy any personal data it may hold in accordance with its internal policy. Personal data will only be retained for as long as Birdie needs it for the purposes of use stated in this policy (and directly related purposes) unless the personal data is also retained to satisfy any applicable statutory, regulatory or contractual obligations or for the purpose of investigation, detection and prosecution of crime.

#### 6. **Disclosure and Sharing of Personal Data**

- a) All personal data held by Birdie will be kept confidential but Birdie may disclose information about you to the following parties to use, disclose, process or retain your personal data for the purposes mentioned above and any other purposes indicated in this paragraph below:
  - (i) contractors, agents or suppliers who are involved in delivering the products and services you have ordered or used;
  - (ii) any banking or financial institutions, charge or credit card issuing companies;
  - (iii) credit information or reference bureaux;
  - (iv) debit-collection agencies or other debt-recovery organizations;
  - (v) emergency services (if you make an emergency call), including your approximate location;
  - (vi) professional advisers (which shall include lawyers and auditors);
  - (vii) any agent, contractor or third party service provider or third party network service provider who provides administrative, telecommunications, computer, payment, data analytics or other services to Birdie in connection with the operation of its business;
  - (viii) law-enforcement or government bodies, regulatory bodies, courts or as required by law;
  - (ix) any person to whom Birdie is under an obligation to make disclosure under the requirements of any law binding on Birdie or under and for the purposes of any guidelines issued by regulatory or other authorities with which Birdie is expected to comply;
  - (x) third party reward, loyalty and privileges programme providers;
  - (xi) external service providers (including but not limited to mailing houses, telemarketing and direct sales agents, call centres, data processing companies and information technology companies) that Birdie engages for the purposes set out in paragraph 4;
- b) Birdie may promote or refer to online stores or websites operated by its business partners or other third parties on Birdie's website. If you want to use or order any services or products from them and click on their links, any information that you provided which is transferred to them will be beyond Birdie's control. Birdie takes no responsibility over such links. You are advised to study their privacy policies.
- c) To ensure the operational stability of our services or enable users to use related functions, we may insert third-party Software Development Kits (SDKs) to achieve the aforementioned purpose. You can visit the third-party Software Development Kits (SDKs) privacy policy website, which is disclosed by our company, for more details about the specific situation of collecting your personal data. If the third party does not provide specific privacy policy related to its SDKs, we may provide its related official website link for helping you to understand its specific information. Currently, the details of inserting third-party SDKs are as follows:
  - (i) iOS system

SDK	Purpose and Official Website Related to SDK usage and Collection of Personal Data
Alipay	Involving Personal Data: device identification code, MAC address, IP address, WLAN access point, WiFi list, device sensor information, network information, device information

	Purpose of Use: to help users use Alipay in the app Usage Scenario: To be used when users pay with Alipay (other scenarios will not trigger this SDK) Collection Method: SDK collection SDK Official Website Link: <a href="https://render.alipay.com/p/f/fd-iwwwijeh/index.html">https://render.alipay.com/p/f/fd-iwwwijeh/index.html</a> SDK Privacy Policy: <a href="https://docs.open.alipay.com/54">https://docs.open.alipay.com/54</a> SDK Related Link: <a href="https://mcgw.alipay.com">https://mcgw.alipay.com</a>
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(ii) Android system

SDK	Purpose and Official Website Related to SDK usage and Collection of Personal Data
Alipay	Involving Personal Data: device identification code, MAC address, IP address, WLAN access point, WiFi list, device sensor information, network information, device information Purpose of Use: to help users use Alipay in the app Usage Scenario: To be used when users pay with Alipay (other scenarios will not trigger this SDK) Collection Method: SDK collection SDK Official Website Link: <a href="https://render.alipay.com/p/f/fd-iwwwijeh/index.html">https://render.alipay.com/p/f/fd-iwwwijeh/index.html</a> SDK Privacy Policy: <a href="https://docs.open.alipay.com/54">https://docs.open.alipay.com/54</a> SDK Related Link: <a href="https://mcgw.alipay.com">https://mcgw.alipay.com</a>

## 7. **Direct Marketing**

- a) Birdie intends to use your personal data such as your contact details, including contact name, mobile telephone number, email address, delivery address and other information such as information about the products or services you have viewed online or purchased and your location data so that Birdie and/or its business partners can send you information, materials, products, offers and news about the following products and services (in respect of which Birdie may or may not be remunerated):
  - (i) all products or services by Birdie including its online platforms, mobile applications, mobile voice and data communications, IDD/roaming, entertainment and information services, Internet connectivity and data communications on the Internet;
  - (ii) reward, loyalty or privileges programmes and related products and services; and
  - (iii) products and services offered by Birdie's business partners including travel, dining, entertainment, apparel, health & beauty, education, household, transportation, banking, insurance and other consumer products and services.

Birdie will seek your consent or indication of no objection before Birdie uses your personal data in direct marketing.

- b) You may opt out (free of charge) from receiving direct marketing communications at any time in writing by post to the address stated in paragraph 10(c) below or by other means stated in Birdie's websites from time to time.

## 8. **Security of Personal Data**

- a) Birdie has adequate measures to protect your personal information from unauthorized access, accidental loss or destruction.
- b) If Birdie has a contract with another third party organization to provide a service on its behalf, Birdie will ensure they have appropriate security measures and only process your information as Birdie has authorized. Those organizations will not be entitled to use your personal information for their own purposes. Birdie will take reasonable steps to check these organizations to make sure that they are meeting the security requirements set by Birdie.

## 9. **Transfer of Personal Data Outside of Hong Kong**

At times it may be necessary and/or prudent for Birdie to transfer certain personal data to other group companies or service providers outside of the Hong Kong Special Administrative Region ("Hong Kong"). This may happen if Birdie's servers or suppliers and service providers are based outside of Hong Kong or if you use Birdie's services and products while visiting countries outside Hong Kong. Birdie will take steps to ensure that your personal information is used by such third parties in accordance with this policy.

## 10. **Your Privacy Rights**

- a) In accordance with the Personal Data (Privacy) Ordinance ("the Ordinance") and subject to exemptions specified in the Ordinance, you have the right to:
  - (i) check whether Birdie holds personal data about you and to receive copies of such data;
  - (ii) require Birdie to correct any personal data relating to you which is inaccurate; and

- (iii) ascertain Birdie's policies and practices in relation to personal data and to be informed of the kind of personal data held by Birdie.
- b) In accordance with the Ordinance, Birdie has the right to charge a reasonable fee for processing a data access request.
- c) Requests for access to personal data, correction of personal data, information relating to the kind of data held and to stop receiving or re-start receiving direct marketing, may be made in writing by post to:

The Data Protection Officer  
Birdie Mobile Limited  
P.O. Box 78,  
Fo Tan Post Office, N.T

Please identify yourself with your name and contact number when writing to the Data Protection Officer.

**11. Privacy Policy Published at [www.birdie.com.hk](http://www.birdie.com.hk)**

This Privacy Policy is subject to change from time to time without prior notice and any changes will be posted on Birdie's website [www.birdie.com.hk](http://www.birdie.com.hk). You are advised to check for the latest version regularly. If there is any inconsistency or conflict between the version posted on the website and the previous versions, this version shall prevail. All handling of personal data will be governed by the most recent version of the policy. If there is any inconsistency or conflict between the English and Chinese versions of this Privacy Policy, the English version will prevail.

Registered office: Room 2010-2011, 20/F, Millennium City 2, Kwun Tong, Hong Kong.