

PRIVACY POLICY HONG KONG

This statement outlines HFG privacy policy on when and how we collect personal data and how we maintain, use, store, transfer and disclose the personal data we hold. It applies to all operations within HFG (Hong Kong) Limited ('HFG'), including visitors to our website.

It is the policy of HFG to respect the confidentiality of personal data and the privacy of individuals. HFG are bound by the Personal Data (Privacy) Ordinance (Cap. 486) and its amendment Ordinance of the laws of the Hong Kong Special Administrative Region.

The HFG privacy policy will be reviewed and updated from time to time to take account of new laws and technology, changes to our operations and practices and to make sure it remains appropriate to the changing environment. Any information we hold will be governed by the most current version of the HFG privacy policy.

Types of personal data held by HFG

Personal data means any type of information (i) relating directly or indirectly to a specific individual; (ii) from which enables it is practicable for the identity of the individual to be directly or indirectly ascertained; and (iii) in a form in which access to or processing of the data is practicable.

Personal data may include:

- Name
- IC number
- Employer
- Photo page of passport
- Visa details
- Date of birth
- Contact details
- Emergency contact details
- Work telephone number
- Work email address
- Work experience
- Qualifications
- Aptitude test results
- References
- Other personal data obtained or received by us in connection with your possible and actual work placements
- Personal data associated with managing queries and complaints

This policy applies to all data we process about you and may include some data about your physical or mental health or condition, political opinions, religious or similar beliefs, commission or allegations of an offence and other sensitive personal data. References to personal data in this policy include such sensitive personal data.

When & how personal data is collected

Personal data should not be collected unless:

- The data is collected for a lawful purpose directly related to a function or activity of HFG
- The collection of data is necessary for or directly related to that purpose
- The data is adequate but not excessive in relation to that purpose

Standard personal data collection

We may collect personal data about you when:

- You complete the HFG registration forms or provide any other information in connection with your application
- We receive any reference about you
- We receive results of inquiries that we might make of your former employers, professional associations or registration body
- We receive the results of any competency or medical test or any background check
- We receive any information about any insurance investigation, litigation, registration or professional disciplinary matter, criminal matter, inquest or inquiry in which you were involved
- You provide us with any additional information about you

General information collected from visitors to our website

We gather information about all our website users collectively, such as what areas users visit more frequently and what services users access the most. We only use such data anonymously and in the aggregate. This data helps us determine what is most beneficial for our users, and how we can continually create a better overall website experience for you.

Your personal data collected on the HFG.co.uk website

In some instances we may need specific data about you, such as name, address, email address, telephone number etc. We will collect this data if you apply for a job or sign up for a service via our website or advertising partners. We may also ask you for other data such as the types of jobs you are interested in in order to provide you with the best possible service.

PURPOSES FOR WHICH WE COLLECT PERSONAL DATA

Provision of services

Please note that it is mandatory for you to provide us with such personal data in order for us to be able to provide you with our services.

Your personal data may be used in connection with:

- Your actual or possible work placement
- Career guidance or management
- Any test or assessment (including medical tests and assessments) that you might be required to undergo
- Our management and resolution of any complaint, inquiry or investigation in which you are involved
- Any insurance claim or proposal that requires disclosure of your personal or sensitive information
- Undertaking criminal reference checks
- For research, development, business systems and infrastructure testing, and other business purposes to assist us in providing our services to you
- Providing our services to you or our clients

Direct marketing

Where we have obtained your consent (eg by you agreeing in writing to our Privacy Notice) or are otherwise lawfully allowed to do so, we intend to use your name, residential address, mobile phone number, residential home number and email address to promote HFG recruitment services and events, by phone, SMS/MMS, email or post as further described in this policy.

We cannot use or provide your personal data for use in direct marketing unless we receive your consent to the intended use or provision or have another lawful basis.

Disclosures

We may disclose your personal data for the purposes for which it is collected. Your personal data may be disclosed to:

- Potential and actual employers and clients of HFG
- HFG employees and potential employers located primarily in Hong Kong, Singapore, Malaysia, Indonesia, Thailand, United Kingdom, (and any other countries where HFG provides services or may provide its services in the future) regarding possible work placements or to assist us in providing our services to you
- Referees
- A professional association or registration body that has a legitimate interest in the disclosure of your personal and sensitive information
- A Workers Compensation body
- Any person with a lawful entitlement to obtain the information
- Accountants, auditors, company secretarial services and professional advisers
- IT, data, network, technology, internet, social network and business process service providers and organisations
- Marketing and event organisers, venues and companies

This may include transferring your personal data to a location or country that may not offer the same level of protection of personal data as Hong Kong.

We do not disclose data about your individual visits to the HFG website.

Cookies

We use cookies in order to prepare statistics of users' preferences and to help you navigate the web site. Cookies are small text files that are temporarily stored on your local hard disc. Our cookies cannot run programs or bring viruses to your computer.

Most browsers automatically accept cookies, but you can deactivate this function at any time and set your browser to notify you whenever a cookie is sent. If you want to know how to do this please look at the help menu on your browser. However, switching off cookies may restrict your use of our web site.

Information collected includes:

Device-specific data

The following information may be collected through your device and browser:

- Your device's IP address (collected and stored in an anonymized format)
- Your email address including first name and surname
- Device screen size
- Device type (unique device identifiers) and browser information
- Geographic location (country only)
- Preferred language used to display the webpage

Log data

Our servers automatically record information. Data includes:

- Referring domain
- Pages visited
- Geographic location (country only)
- Preferred language used to display the webpage
- Date and time when website pages were accessed

This information is used for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage.

Management of personal data

At HFG, we train our staff to respect the confidentiality of customer information and the privacy of individuals. We regard breaches of your privacy very seriously and any breach will result in disciplinary action being taken, dependent upon severity. HFG have appointed employees to ensure that our management of personal information is in accordance with this policy and the Personal Data (Privacy) Ordinance.

How do we store & protect personal data?

Safeguarding the privacy of your personal data is important to us, whether you interact with us personally, by phone, mail, over the internet or other electronic medium. Information and records relating to service users will be stored securely and will only be accessible to authorised staff.

Information will be stored for only as long as it is needed or required by statute and will be disposed of appropriately. When we consider data is no longer needed for the fulfilment of the purpose (including any directly related purpose) for which the data is or is to be used, we will remove any details that will identify you or we will securely destroy the records.

It is HFG's responsibility to ensure all personal and company data is non-recoverable from any computer system previously used within the organisation which has been passed on/sold to a third party.

How do we keep personal data accurate & up to date?

HFG take reasonable steps to ensure that the personal information it holds and discloses is accurate up to date and complete. We recognise that personal data changes frequently with changes of address and other personal circumstances. We generally update your customer data over the telephone or email. Please advise A consultant when your personal details change.

Enquiries & complaints

You can make enquiries, requests to access/delete or correct your information, or complain about alleged breaches to, or otherwise contact our team:

Email privacy@hfgasia.hk

Address 23rd Floor, One Island East, 18 Westlands Road, Quarry Bay, Hong Kong

We aim to acknowledge receipt of all complaints within 10 working days and aim to resolve all complaints within 40 days. This may not be possible in all circumstances depending on the contents of the complaint. In this situation, we will respond to your complaint in a reasonable time.

Access

Subject to some exceptions that are set out in the Personal Data (Privacy) Ordinance you can gain access to the personal data that we hold about you.

To make a request to access your personal data, you will need to email privacy@hfgasia.hk (we will need to verify your identity) specifying what information you require. We will respond to your request within 40 days after the request is made and provide access to the information in the manner requested.

We may impose a moderate charge in providing access. Our Privacy Officer will discuss this with you if we refuse to provide you with access to your personal data in accordance with the Personal Data (Privacy) Ordinance, we will notify you in writing of the reasons for the refusal and the process for escalation regarding this refusal.

Correction

You may request that we correct the personal data that we hold about you if you deem it to be inaccurate, incomplete, out-of-date, irrelevant or misleading. We will:

- Make the necessary correction to that data
- Supply to you with a copy of the data as so corrected

- If the data has been disclosed to a third party during the 12 months immediately preceding the day on which the correction is made; and HFG has no reason to believe that the third party has ceased using the data for the purpose (including any directly related purpose) for which the data was disclosed to the third party, we will take all practicable steps to supply the third party with a copy of the data as so corrected accompanied by a notice in writing stating the reasons for the correction.

If we refuse to correct your personal data in accordance with the Personal Data (Privacy) Ordinance, we will notify you in writing of the reasons detailing our refusal to correct the information and the process for escalation regarding this refusal. If you wish to exercise your rights of correction you should contact our Privacy Officer for an application form. We will not charge you for making the request to correct your information.

Feedback

HFG may, from time to time, send out feedback survey requests in order to access our delivery and performance. Any feedback that is submitted through this becomes the property of HFG. We may use this feedback, such as success stories or responses to surveys, for marketing purposes, or, with your consent, contact you for further feedback on the site.