

## **Privacy Policy**

e-Smart System Engineering Limited ("e-Smart", "we", "our" or "us"), being the owner and operator of this System, value all personal information provided by users of this System ("Users", "you" or "your") and this statement ("Privacy Policy") sets out e-Smart's policy and practices in relation to personal data in operating this System. Our Privacy Policy may be amended from time to time. You should check our Privacy Policy regularly to ensure that you are aware of our latest policies. In this statement, the references to "the Property" shall mean City One Shatin, New Territories, Hong Kong and the references to "the Group" shall mean any subsidiary, affiliate or business partner of e-Smart or CK Asset Holdings Limited or any company in which e-Smart or CK Asset Holdings Limited or any of their respective subsidiaries has a direct or indirect interest or with which any of them is in joint venture or co-operation.

### **A. Information We Collect**

When you visit this System, we may collect two types of information from you:

- (i) personal data you knowingly choose to disclose that is collected on an individual basis; and
- (ii) the System user information collected on an aggregate basis as you and others browse this System.

At times, you may be required to give your personally identifiable information including, but not limited to, your name, identity document number, telephone number, residential address within the Property, e-mail address, the unique user name and password that you may have been provided by the management office or building manager of the Property in order to login this System, demographic information (age and sex), personal interests and favorite activities. Failure to provide any of such information may result in delay or inability of e-Smart to, or to continue to, provide you with our services (including access to this System or certain part thereof and handling any application or request you are making) or may otherwise defeat the objectives of your visit.

In addition to providing the foregoing personal data to us, if you choose to correspond further with us through e-mail, we may retain the content of your e-mail messages together with your e-mail address and our responses. We provide the same protection for these electronic communications that we employ in the maintenance of information received by mail and telephone. Your information may be stored and processed in one or more databases held by us or any member of the Group in and outside Hong Kong (which may contain other information collected by us or any other member of the Group).

You agree that we may retain, store, use or otherwise deal with any information you provide as required aforesaid in accordance with this Privacy Policy.

This System utilises Web server logs and will use a standard technology called cookies to store and track information about you when you visit this System and this is done without you being aware that it is occurring. Information gathered by using cookies and Web server logs may include the date and time of visits, the pages viewed, time spent at this System, and the websites you visited immediately before and after this System. This information is collected on an aggregate basis. None of the information so gathered is associated with you as an individual.

We also log IP addresses, or the location of your computer on the Internet, for systems administration and troubleshooting purposes. We do not use IP address logs to track your session or your behavior on this System unless otherwise provided in our Posting Rules.

## **B. Our Use and Disclosure of Your Information**

Broadly speaking, we use personal data for purposes of providing services, resolving disputes, troubleshoot problems and enforcing provisions of our Terms of Use or any other purposes as shall be agreed between you and us or be required by law from time to time. Occasionally, we may also use the personal data we collect to notify you about important changes to this System, new services, latest announcements, and special offers or other information we think

you will find valuable. If you do not want to receive these offers or information from us, please notify us in writing.

The main purposes for which your personal data may be used by us are:

- Processing your application or registration for our services, enquiry or feedback and carrying out your instructions
- Transmitting to other third party service providers (including, but not limited to, the management office or building manager of the Property) regarding your application or request made through this System for services provided by, or enquiries made to, such third party service providers
- Incorporation into our user database
- Provision of contacts and business details in response to enquiries and complaints
- Enabling the daily operations of or cessation or termination of your account
- Service surveys
- Direct marketing
- Processing billing and payment
- Meeting requirements to make disclosure under any law or court order or pursuant to any request or requirement of regulatory or governmental authority, in each case, applicable in or outside Hong Kong
- Auditing
- Matching for whatever purpose (whether or not with a view to taking any adverse action against a User) any such personal data in e-Smart's possession with other personal data concerning the Users
- Enabling us to comply with our obligations to interconnect or other industry practices
- Other related purposes

We may use your personal data both in and outside Hong Kong.

We may perform statistical analyses of user behavior in order to measure interest in the various areas of this System (for product development purposes) and to

inform advertisers as to how many users have seen or "clicked" their advertising banners. We also use demographic and preference information to allow advertising banners on this System to be targeted, in aggregate, to the readers for whom they are most relevant. This means that readers see advertising that is most likely to interest them, and advertisers send their messages to people who are most likely to be receptive, improving both the viewer's experience and the effectiveness of the advertisement. For these purposes, we will disclose information to third parties only in aggregate form.

You acknowledge and agree that the information you provide to us is provided voluntarily, and is accurate, true, current and complete and that you are solely responsible for the form, content and accuracy of any material and information placed by you on this System. You are responsible for all actions taken with your username and password. We do not recommend that you disclose your username and password to any third parties. If you lose control of your password, you may lose substantial control over your personally identifiable information and may be subject to legally binding actions taken on your behalf. Therefore, if your password has been compromised for any reason, you should immediately notify the management office or building manager of the Property.

This Website makes message boards available to the Users. Please remember that any information that is disclosed in these areas becomes public information and you should exercise caution when deciding to disclose your personal information.

If it becomes necessary that we take legal action against you for any reason whatsoever including copyright infringement, you expressly agree that the personal data provided by you can be relied upon in identifying and taking action against you.

We may disclose information when legally compelled to do so or when we, in good faith, believe that the law requires it or consider that such disclosure is necessary or appropriate for the protection of our legal rights.

We retain personal data so long as the data is still required for the purposes

mentioned above. We reserve the right to retain copies indefinitely for our archives if necessary.

Personal data held by us will be kept confidential but we may provide such data to:

- The management office or building manager of the Property;
- Banks and other financial institutions in connection with the collection of payments;
- Any personnel, agent, adviser, auditor, telecommunications operator, contractor or service provider which provides services or advice to us in connection with our operations or in connection with this System (including any third party service provider which provides services to you through this System);
- Any credit reference agencies or security agencies;
- Any person under a duty of confidentiality to us;
- Any person to whom we are required to make disclosure under any law applicable in or outside Hong Kong;
- Any member of the Group; and
- Any actual or proposed transferee of our business or this System or any part of our business or this System or participant in our operations.

You should also note that the privacy protection as set out in this Privacy Policy does not apply to personal data which is passed to third parties, and we are not responsible for the protection of your personal data or lack thereof by such third parties.

Except as otherwise provided in this Privacy Policy, personal data about you as an individual user will not be provided to any third party without your consent.

From time to time you may notice offers from outside companies advertised on this System. However, we do not make any representations about the practices and policies of these companies. If you want to use or order any services or products from any of them, please note that any information you provide, once transferred to the relevant outside company, is beyond our control and thus

outside the scope of protection afforded by us.

### **C. Data Security and Third Party Sites**

Given the nature of Internet, e-Smart cannot guarantee that the transmission of data is 100% secure. Personal data or e-mail that you send to us may not be secure unless we advise you that security measures will be in place prior to your transmitting the information. We utilise encryption/security software to safeguard the confidentiality of personal data we collect in the residents login page and User Profile Setting page from unauthorized access or disclosure and accidental alteration or destruction.

Please be aware that this System contains advertisements and links to other sites on the Internet that are owned and operated by third parties and occasionally allows other sites to be co-branded with the e-Smart name. Please be aware that e-Smart's advertisers or other websites that have links on this System may collect personal data about you and that when you use a link to go from this System to another website or when you use a co-branded site, our Privacy Policy is no longer in effect. Your browsing and interaction on any other website, including websites that have a link to this System, is subject to that website's own rules and policies which may differ from those of this System. e-Smart has no control over the use or disclosure of user data on other sites on the Internet and we recommend that you review the privacy policies of such sites to determine your privacy rights on such sites.

We are not responsible for the practices employed by websites linked to or from this System nor the information or content contained therein. Often links to other websites are provided solely as pointers to information on topics that may be useful to the users of this System.

### **D. Personal Data (Privacy) Ordinance of Hong Kong**

Under the Personal Data (Privacy) Ordinance of Hong Kong, you have the right:

- To check whether we hold data about you and to access such data;

- To require us to correct any inaccurate data relating to you; and
- To be told our policies and practices in relation to personal data and the kind of personal data held by us.

We may charge a reasonable fee for processing any data access request.

You may address data access or correction requests, and questions or complaints to:

Personal Data Privacy Officer  
e-Smart System Engineering Limited  
7th Floor  
Cheung Kong Center  
2 Queen's Road Central  
Hong Kong.

#### **E. Changes to Privacy Policy**

Periodically, our operations and business practices are reviewed for compliance with corporate policies and procedures governing the security, confidentiality and quality of our information. This policy may be updated from time to time so please check this statement periodically as it is your responsibility to make sure you are aware of our latest policies.

Our corporate values, ethical standards, policies and practices are committed to the protection of user information. In general, our business practices limit employee access to confidential information, and limit the use and disclosure of such information to authorized persons, processes and transactions. Employees designated to handle personal data will be instructed to do so only according to this Privacy Policy.

By using this System you consent to our collection and use of your personal data as described in this Privacy Policy from time to time.