

## Privacy Policy Statement

### Statement of Policy

1. The West Kowloon Cultural District Authority (“WKCDA”) and its subsidiaries including M Plus Museum Limited , Hong Kong Palace Museum Limited and West Kowloon Cultural District Foundation Limited (collectively the “Group” or “we”) respect personal data privacy. We will comply with the Personal Data (Privacy) Ordinance (Cap. 486 of the laws of Hong Kong SAR) (“the Ordinance”) and are committed to fully implement the data protection principles promulgated under the Ordinance.

### Statement of Practices

#### Information We Collect

2. From time to time, we may collect various types of personal information (“**personal information**” or “**personal data**”) (such as email address, name and contact number) from you in connection with our provision of services, activities and facilities, including but not limit to account registration, ticketing transaction, e-newsletter subscription, event registration, membership, Wi-Fi usage, payment, following up on enquiries, conducting customer surveys, advertising, venue booking, fundraising campaigns, job application and/or employment-related issues, and contract management, etc.
3. We do not actively collect personal data of minors under the age of 18 but we may collect their personal data while they use our services or register for our activities and events. Minors must have obtained consent from their parents or guardians before providing personal data to us.

#### Main Purpose of Keeping Personal Data

4. The main purposes of collecting the personal data are as follows:
  - i. for processing your service requests (i.e. event registration, ticket purchase, e-newsletter subscription, product purchase, WiFi usage, MyWestKowloon account registration, member registration, venue booking, and donation, etc.) with us and provide you with the services;
  - ii. for administering your account and maintaining your records;
  - iii. for facilitating communications between you and us;
  - iv. for notifying you of changes to our services that may affect you;
  - v. for responding to and following up on your enquiries;
  - vi. for enhancing your experience in the West Kowloon Cultural District with programmes and offerings that are of interest;
  - vii. for direct marketing upon obtaining explicit consent from you;
  - viii. for managing customer relationships within the Group;
  - ix. for communicating with you for potential support to the Group that is relevant to your interests and appropriate;

- x. for conducting and facilitating promotional activities, events, lucky draws or prize redemption;
- xi. for customising and sending contents, advertisements, notifications and other information on our websites, mobile applications, social media platforms and other platforms (“**platforms**”) based on your habits, experience, interests and preferences;
- xii. for administering, maintaining and improving our platforms;
- xiii. for conducting statistical analysis, research, surveys, quality assurance, behavioural analysis and review;
- xiv. for processing your job application and/or employment-related issues;
- xv. for executing the service contracts between you and us; and
- xvi. for other purposes directly relating to any of the above.

We may collect and combine/process information from you (except for Purposes xiv and xv) through various channels, such as online channels (e.g. websites, mobile applications, social media platforms), offline channels (e.g. physical application forms), or publicly available information about you. We use this information to help improve your experience and communicate with you about events or offerings that may be of interest.

### **Implementation of Practices**

- 5. We will implement the practices at (a) to (f) below in accordance with the data protection principles in the Ordinance.

#### **(a) Collection of personal data**

- 6. When collecting personal data, the Group will satisfy itself that:
  - i. the purposes for which the data is collected are lawful and directly related to a function or activity of the Group;
  - ii. the manner of collection is lawful and fair in the circumstances; and
  - iii. the personal data collected is necessary but not excessive for the purpose(s) for which it is collected.
  
- 7. When we collect personal data from you, you will be provided with a Personal Information Collection Statement (“**PICS**”) on or before the collection in an appropriate format and manner. Practicable steps will be taken to ensure that –
  - i. you are informed of whether it is obligatory or voluntary to supply the data and, if obligatory, the consequences in failing to do so; and
  - ii. you are explicitly informed of the purpose(s) for which the personal data is to be used, the classes of persons to whom the data may be transferred or disclosed, your right to request access to and correction of the data, and the contact details of the officer to whom any such request may be made.

If we intend to use the personal data collected for a new purpose, other than the purpose of first collection as stated in the PICS, we will obtain a prior consent from the data subject before the usage. If the data subject is under the age of 18, we will only use the personal data for a new purpose after we obtained prior consent from the parent or guardian of the data subject.

**(b) Accuracy and retention of personal data**

8. Personal data collected and maintained by us will be as accurate, complete, and up-to-date as is necessary for the purpose(s) for which it is to be used.
9. We maintain a personal data inventory, which contains the kinds of personal data that we hold, the purposes for which the personal data is collected, used and disclosed, and how the personal data is stored. The personal data inventory will be reviewed periodically to ensure that it is accurate and up-to-date.
10. We will only retain your personal data for as long as is reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we will consider the amount, nature, and sensitivity of the personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. Should there be a need to retain personal data for statistical purposes, such personal data will be anonymised so that the individuals concerned can no longer be identified.

**(c) Use of personal data**

11. All personal data collected will be used by and shared among the Group for purposes which are directly related to the discharge of the Group's activities or functions. We will never sell or rent your information with any other organisation outside the Group. We may transfer your personal information to our service providers such as IT contractors, cloud service providers, event agents and confidential documents disposal service agents, etc., in order for them to perform services on our behalf. We may also share your personal data with partners or service providers that are involved in co-organising events with us or providing goods and services to you or fulfilling your requests. We will ask for your consent before sharing personal information with third party partners for direct marketing purposes such as external online platforms and social media platforms, etc. Personal data may also be disclosed to other entities which are authorised to receive such information for law enforcement, prosecution, or review of decisions purposes, or otherwise as required or permitted by law. We may also need to transfer your personal data outside of Hong Kong for necessary handling, processing or storage. You will be informed of the transferees of personal data when your personal data is collected. We require all transferees to respect the

security of your personal data and comply with the Ordinance and other applicable personal data laws. We do not allow our transferees to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

12. If personal data is to be used for a purpose other than the purposes for which the data is collected, prior consent will be sought from you where practicable. In seeking the consent, all practicable steps will be taken to ensure that
  - (i) information provided to you is clearly understandable and readable; and
  - (ii) you are informed that you are entitled to withhold your consent or withdraw your consent subsequently by giving notice in writing.
  
13. We will not use personal data or provide personal data for use in direct marketing without your explicit consent. Such direct marketing communications may take the form of mails, emails, SMSs, targeted online advertisements, notifications via our mobile applications, push notifications, instant messaging, etc. Such direct marketing communications may relate to products, activities, events and services of the Group, including those sponsored by or jointly organised by the Group with third parties, and those on offer or taking place at the West Kowloon Cultural District (“Marketing Communications”). Examples of these Marketing Communications include newsletters, membership benefits, shop/merchandise promotions, event invitations, invitations to donations, etc. If we intend to use your personal data for direct marketing, we will obtain explicit consent from you before using your personal data, and will notify you when using personal data for direct marketing for the first time that you have a right to request us to cease using the data for direct marketing if you so require. These Marketing Communications may be sent by the Group and/or an external party on our behalf (e.g. external online platforms and social media platforms). If we intend to provide personal data to an external party (e.g. our service providers or third party partners) for use by that other person for their direct marketing purposes, we will inform you in writing in advance that we intend to provide the personal data and will not provide the personal data unless we have received your explicit consent. You may, at any time, require us to cease using your personal data in direct marketing by informing us through the channels as stated in practice (f) below.

**(d) Security of personal data**

14. We observe strictly all relevant security standards and regulations. Security arrangements will be reviewed regularly to ensure that personal data is protected against loss and unauthorised or accidental access, use, disclosure, modification and erasure. The security arrangements include, without limitation, the following:
  - i. restriction of access to personal data on a “need-to-know” basis;

- ii. regular review and enhancement of security measures for protection of personal data in the servers, user computers, or transmission of electronic messages;
- iii. regular change of passwords for IT facilities, or accounting and personnel systems;
- iv. encryption of all backup tapes that are to be transported to offsite storage;
- v. limited staff access rights to office areas storing confidential information; and
- vi. provision of clear guidelines to staff as to the types of data that may or may not be disclosed to an enquirer and implementation of appropriate identity verification procedures to confirm the enquirer's identity.

**(e) Transparency of the personal data policy and practices**

15. The Group's privacy policy and practices can be found on our website <https://www.westkowloon.hk/privacy>, as may be updated from time to time.

**(f) Access to and correction of personal data**

16. We recognise your rights of access to and correction of your personal data in accordance with the Ordinance. To make a data access request, you should complete the form specified by the Office of the Privacy Commissioner for Personal Data, which is available at <http://www.pcpd.org.hk/english/publications/files/Dforme.pdf>, and submit the completed form to the Group in any one of the following ways –

**By email/fax/post/in person:**

Attn. Data Protection Office

**By email** at [privacy@wkcd.hk](mailto:privacy@wkcd.hk); or

**By post or in person** to West Kowloon Cultural District Authority, 9/F, WKCDA Tower, West Kowloon Cultural District, No. 8 Austin Road West, Kowloon, Hong Kong.

17. When handling a data access or correction request, we will check the identity of the requester to ensure that the requester is the person legally entitled to make the data access or correction request.
18. We may impose a fee for the necessary cost of complying with a data access request. We will clearly inform the requester the amount to be charged.
19. We may refuse a data access request in the circumstances specified in Section 20 of the Ordinance.

20. We maintain a logbook recording the data access or correction requests received as required under Section 27 of the Ordinance.

#### **Use of Cookies –**

21. When you browse our platforms, cookies will be stored in the browser of your computer or device. Cookies do not collect any personally identifiable information. The purposes of using cookies are to:
- remember your browsing preferences (e.g. language, browsing font size) you have chosen in this website to customise your experience;
  - personalise your user experience and/or maintain your identity across multiple webpages and/or internet sessions;
  - analyse how our platforms are used and compile anonymised data and aggregate statistics; and
  - improve the use and the functionality of our platforms.

We also use third party cookies such as Google Analytics to analyse anonymised data to help us understand how our audiences interact with our platforms and visitor traffic and habits, so that we can improve your overall experience. You may disable the use of Google Analytics by opting out via [\[https://tools.google.com/dlpage/gaoptout?hl=en-GB\]](https://tools.google.com/dlpage/gaoptout?hl=en-GB).

We may also use web beacons and other similar technologies in addition to, or in combination with, cookies. Web beacons are transparent graphic images that help us to determine whether you have accessed our contents.

You have a choice not to accept the cookies, however this may affect certain functionalities of our platforms.

#### **Targeted/Behavioural Advertising -**

22. We may also engage third party partners or service providers to collect IP addresses and other information through the use of cookies and other technologies on our platforms and third-party websites. The information collected will be used to help us customise our contents, advertisements, notifications and other information provided on our platforms, external websites and social media platforms. If you do not wish to receive those contents, advertisements, notifications and other information on third party websites and platforms, you may change your browsing preferences on those third-party websites and platforms.

#### **Website Statistics–**

23. When you visit our platforms, we will record your visit only as a “hit”. The webserver makes a record of your visit that includes your IP addresses (and domain names), the types and configurations of browsers, language settings,

operating systems, previous sites visited, and time/duration and the pages visited (collectively, “**webserver access log**”).

We use the webserver access log for the purpose of maintaining and improving our platforms such as to determine the optimal screen resolution, or which pages have been most frequently visited. We use such data only for website enhancement and optimisation. User data is all anonymous.

### **Linking with Third Parties**

24. Please be aware that our platforms may contain links to other sites hosted by third parties. Different rules may apply to their collection, use, or disclosure of your personal information. These third-party sites may collect cookies which can identify you as an individual when you are logged in to their services. We do not control these cookies or how these sites collect and handle your personal data. We encourage you to review such third-party websites’ policies before revealing any personally identifiable or sensitive information. We are not responsible for the content or privacy practices and policies of such other sites and under no circumstances shall we have any liability whatsoever for the activities conducted by or at any website accessed from or through our platforms.

### **Incident Reporting and Breach Handling**

25. A mechanism is set up for incident reporting and breach handling in case there is a loss or leakage of personal data, or there is a reason to believe that the personal data held by the Group has been compromised.

### **Ongoing Monitoring and Review**

26. We will keep this Privacy Policy Statement and relevant policies under regular review. Officers responsible for handling personal data will attend relevant training courses to keep themselves updated of the latest personal data policies.

### **Enquiries**

27. Any enquiries regarding personal data privacy policy and practice may be addressed to the Data Protection Office at the above correspondence address or via email at [privacy@wkcd.a.hk](mailto:privacy@wkcd.a.hk).

### **Interpretation**

28. Words used herein which import the singular only also include the plural and vice versa where the context so admits.
29. Words used herein which import one gender (whether masculine, feminine or neuter) shall be taken to include any other gender where the context so admits.