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鷹君集團有限公司  
Great Eagle  
Holdings Limited

## **PRIVACY POLICY**

### **1. Introduction**

- 1.1 This privacy Policy described how Great Eagle Holdings Limited (“Great Eagle”) and its subsidiaries (collectively, “Great Eagle Group”, “we”, “us” or “our”) collect, use and process information you provide on the websites or social medial platforms managed and operated by us or our affiliates (the “Site”), our mobile applications (the “App”), the services available through our Site and App, and when you are entering into a contractual or investment relationship with us or our affiliates (collectively, the “Services”). It covers personal data shared by you through our Services, including personally identifiable information and anonymous information.
- 1.2 This policy serves also as the guidelines to be observed by all business divisions operated and/or managed by Great Eagle Group and its affiliates.

### **2. Our Commitment to Protect Your Privacy**

- 2.1 We are committed to safeguard your personal and data privacy. To ensure that you can make informed decisions and feel confident about sharing certain personal information with us, please read this Privacy Policy to understand whom we share your personal data with and for what purpose, and the choices you have concerning how your personal data are collected and used by us. By providing personal information to us, you agree and consent to the collection, use, disclosure, transfer and retention of your personal information as outlined in this Privacy Policy.
- 2.2 This Privacy Policy will be continuously assessed against new technologies, business practices, compliance requirements and your needs. As we update and diversify our products, services and businesses, this Privacy Policy may evolve from time to time. We reserve the right, at our discretion, to change, modify, add or remove any parts from this policy at any time without any prior notice. You are encouraged to review this Privacy Policy from time to time for updates periodically. Your continued use of the Services after such revisions are posted to be made means you elect to accept these changes.
- 2.3 Certain personal data are required for specific services and if you fail to supply such personal data as requested from each specific service, we may be unable to provide you the services in full.
- 2.4 If you are under the age of 18, consent from your parent or guardian is required before you provide us with any personal data.
- 2.5 If you are a citizen of the European Union (EU) or European Economic Area (EEA) and are using our Services, we will maintain your personal data as outlined in the GDPR Addendum of this Privacy Policy.

### 3. Collection of personal data

3.1 ***Information you voluntarily provide to us when you sign up for and use the Services*** - We will collect some personal data from you directly. The provision of personal data to us is on a voluntary basis. If you fail to provide sufficient information, we may not be able to provide relevant Services. If you provide us with information about other individuals, you should have already obtain authorisation from those individuals and let them know where they can find a copy of this Privacy Policy. We collect personal data (including where applicable sensitive personal data) you provide directly to us. By virtue of your provision of personal data, you consent to such personal data being collected, used, disclosed, transferred, and retained by us as described in this Privacy Policy. Subject to circumstances, this type of information may include:

- 3.1.1 your personal information such as your first name/last name, title, contact details (e.g. mobile phone number, physical address and e-mail address), gender, occupation, location, job title, billing information, purchase history and other demographic information;
- 3.1.2 username and password that you will use to access to our Services;
- 3.1.3 a record of any interactions and correspondence between us such as email, telephone, mobile short messaging service (SMS), multimedia messaging services (MMS), cross-platform mobile messaging application (e.g. smartphone messaging application) or postal correspondence, any interactions you have with our staff or representatives and any interactions with us or posts that refer to us on social media;
- 3.1.4 information that we collect about your interests, preferences and opinions;
- 3.1.5 your feedback, opinions about our Services and your responses to market surveys and contests conducted by us;
- 3.1.6 information collected through the use of closed circuit television systems and other security systems;
- 3.1.7 any other personal data you choose to provide to us; and
- 3.1.8 for investor or shareholder of any of the listed platforms<sup>Note(1)</sup> controlled or managed by us, your full name, postal address, percentage of share and vote, other personal data strictly in connection with the investment and, if appropriate, copy of your identification document, either directly from you or from the share registrars and transfer offices of these listed platforms.

*Note (1) They include Great Eagle Holdings Limited (Hong Kong Stock Exchange (“HKEx”) Stock Code: 41), Champion Real Estate Investment Trust (HKEx Stock Code: 2778) or Langham Hospitality Investment and Langham Hospitality Investments Limited (HKEx Stock Code: 1270).*

3.2 ***Information we collect automatically when you use our Services*** - When you access or use our Services, we automatically collect information about your visit to our Sites, your usage of our Services and your web browsing. That information may include your IP address, your operating system, your browser ID, your browsing activity, and other information about how you interacted with our Site and other websites. We may collect this information as a part of log files as well as through the use of cookies or other tracking technologies. Cookies used in any part of our Site will not be deployed for collecting personal data. For your information, Cookies are small computer files that can be stored in web surfers' computers for the purposes of obtaining configuration information and analysing web surfers' viewing habits. They can save you from registering again when re-visiting a website and are commonly used to track your preferences in relation to the subject matter of the website. You may refuse to accept Cookies by modifying the relevant internet options or browsing preference of your computer system, but to do so you may not be able to utilise or activate certain available functions in our websites. Our Site may bar users who do not accept Cookies.

3.3 ***Information from your use of the Services*** – We may receive information about how and when you use the Services, store it in log files or other types of files associated with your account, and link it to other information we collect about you. This information may include, for example, your IP address, time, date, browser used, and actions you have taken within the application. This type of information helps us to improve our Services.

3.4 ***Information from other sources*** – We may, from time to time, collect other personal data from third parties including: (a) our service providers and agents; (b) the third parties that we partner with in connection with us; (c) our third party joint marketing and research partners; (d) providers of third party websites, apps and social media platforms; and (e) public databases. Examples of the information we may receive from other sources include demographic information, company information, device information, location, and online behavioural data. We use this information, alone or in combination with other information (including personal information) we collect, to enhance our ability to provide relevant marketing and content to you and to develop and provide you with more relevant products features, and services.

#### **4. Purposes for Collection and Use of personal data**

4.1 Our primary purpose in collecting personal data from you is to give you an enjoyable customised experience. Specifically, we may use data for the following purposes:

4.1.1 to administer and provide our Services to you (including identity verification, system security and maintenance, billing and payment) and to fulfil our obligations to you;

4.1.2 to tailor and personalise services which may be of interest to you;

4.1.3 to provide customer support and to improve the efficiency and quality of our Services;

4.1.4 for marketing and promotion purpose, subject to your rights to opt-in and opt-out of receiving certain marketing communications. For example, membership clubs, loyal and reward programmes and redemption of shopping/dinning privileges or

offers of us or our affiliates. For more details on marketing, please see Section 6 below;

- 4.1.5 for internal record keeping of information of our tenants, customers, employees, consultants, contractors, investors, shareholders, other service providers, business transactions and communications;
  - 4.1.6 to enable us to contact and interact with you whether online or otherwise in connection with our Services or marketing campaigns, promotion programmes or other offerings;
  - 4.1.7 for improvement of customer services and staff training;
  - 4.1.8 for designing new and/or enhancing our existing services, products and activities;
  - 4.1.9 for managing and providing for the safety and security of our guests, customers, visitors, employees or users;
  - 4.1.10 to protect or comply with our legal rights and obligations and to prevent, detect and investigate wrongdoing or crime and analyse and manage any risks or irregularities; and
  - 4.1.11 for any other purposes incidental to the above and for any other purpose to which you may from time to time agree.
- 4.2 To fulfil the above purposes, you may be contacted via email, telephone, mobile short messaging service (SMS), multimedia messaging services (MMS), cross-platform mobile messaging application (e.g. smartphone messaging application), mail or other means that are allowed by local authorities.
- 4.3 We may also from time to time use aggregate non-identifying information about our customers to better design our Site and/or to improve our Services. This means we may provide this information to third parties. This type of data may include, but is not limited to, the browser type and version, operating system, IP address and/or domain name. However, this information will never identify any single member of the programme in particular.

## **5. Who We Share Your personal data with**

- 5.1 We may disclose and transfer personal data to and use personal data with our service providers, and other persons who we consider appropriate, in connection with our services and products provided to or requested by you. We may disclose this information to facilitate communication of news and information about such services and products and otherwise for the purposes mentioned above, under the section 4 above.
- 5.2 The entities with whom we may share your personal data include but are not limited to any agent, contractor or third party service provider who provides administrative, marketing and research, data processing, telecommunications, computer or other services to us and/or our affiliates.

- 5.3 We may disclose your personal data to third parties so they can provide marketing services or conduct marketing or social interaction activities on our behalf such as campaigns, contests, sweepstakes, market research, customer surveys and data analytics to help us improve and tailor our marketing activities, products and services. Subject to obtaining appropriate consent from you, we may also disclose your personal data to our third party marketing partners in order that they may market their products and services to you.
- 5.4 We may disclose your personal data to governments and regulatory authorities and bodies and to other individuals, bodies and organisations such as dispute resolution, prosecution and law enforcement agencies, regulatory bodies and/or legal advisers for compliance with applicable laws, rules, regulations, codes, and/or guidelines and/or any person or entity to whom we are under a binding obligation to make disclosure under the requirements of any law, rule, regulation, code and/or guideline and/or order of any competent court of law, law enforcement agencies and/or regulatory bodies, but such disclosure will only be made under proper authority.
- 5.5 We will permit our third party service providers, including agents, contractors and our affiliates, to use your personal data on our behalf for the purposes set out in section 4 above. Example of such third parties include our contractors under a duty of confidentiality to us who provide administrative, telecommunications, computer, data processing or other services to us in connection with management, operation and maintenance of the system and our data center in or outside Hong Kong.
- 5.6 We may also transfer any information we have about you that may be considered as an “asset” in connection with a merger or sale (including transfers made as part of insolvency or bankruptcy proceedings) involving all or any part of Great Eagle Group or as part of a corporate reorganisation or stock sale or other change in corporate control.

## **6. Marketing**

- 6.1 We may use your personal data for marketing and promotional purposes, including (a) for sending or showing you updates on latest news, offers and promotions in connection with our products and services; (b) for sending or showing you joint marketing offers, events and promotions; or (c) for tailoring and tracking your interactions with internet banner advertisement and links from third party websites to our Site.
- 6.2 We may also use personal data to analyse our customers’ preferences and market trends and derive insights, which we may use to tailor the types of products, offers and services that we present to you. This may involve us combining personal data that we hold about your use of our services with information that we have collected about your web usage. We may also combine information that we have collected about you with information that we have collected about other customers in order to derive these insights and establish market trends. We may provide these insights to our third party partners for their marketing and promotional purposes. We also use advertising services and products provided by third party service providers (such as marketing agencies and social media platforms) for marketing and promotional purposes, which may involve us sharing personal data that we hold about you with them.

- 6.3 We may communicate marketing and promotions to you by email, telephone, mobile short messaging service (SMS), multimedia messaging services (MMS), cross-platform mobile messaging application (e.g. smartphone messaging application), mobile application or online (including via internet banner advertisement and links) and, as appropriate and where required, we will ask you for your consent, or otherwise provide you with the opportunity to choose not to receive marketing, at the time we collect your data.
- 6.4 We will provide an option to unsubscribe or opt out of further communication on any direct marketing communication sent to you. You may also opt out by contacting us as set out in section 8 below.
- 6.5 Please note that if you choose to unsubscribe or opt out of marketing communication, we will still send you communications about the Services we provide to you.

## **7. Transmission, Storage and Security of Your personal data**

- 7.1 *Security* - No data transmission over the Internet, a website, mobile application or via email or other message service or by mail can be guaranteed to be secure from intrusion. However, we maintain commercially reasonable physical, electronic and procedural safeguards to protect your personal data in accordance with the requirements of data protection legislation. All personal data we collect about you is stored on our or our subcontractors' secure servers. We comply with our security policies and standards when accessing or using this information and restrict access to your personal data to those persons who need to use it for the purpose(s) for which it was collected. You are responsible for keeping any information that we send to you confidential and for complying with any other security procedures that we notify you.
- 7.2 *Exporting your personal data* - Your personal data may be transferred outside the country in which you are located, including to countries with a lower level of data protection than in the country in which you are located.
- 7.3 *Retention period* - To the extent permissible by applicable law, we generally only keep your information for as long as reasonably required for (a) the purposes for which that personal information was provided; (b) ongoing business need, including record keeping, fraud prevention, or if we reasonably believe there is a prospect of litigation; and (c) as necessary to meet legal, regulatory, tax or accounting needs. We take reasonable steps to safely and securely delete, dispose of, anonymise and/or block person information when we no longer need it.

## **8 Your Rights and Contacting Us**

- 8.1 *General rights* - You have the right (subject to various exceptions and in accordance with data protection legislation in your country) to access certain personal data held about you and correct any inaccuracies by contacting our Data Protection Officer. We may charge a reasonable fee for the processing of any data access request. You also have the right to raise a complaint about our processing by contacting our Data Protection Officer.

- 8.2 *Right to opt out of direct marketing* - You have the right to ask us not to process your personal data for direct marketing purposes. You can exercise your right to prevent such processing by indicating that you do not consent to direct marketing at the point at which we collect your personal data. You can also exercise the right at any time after we have collected and used your personal data for direct marketing purposes by (a) following the opt-out instructions contained in the relevant communications; or (b) contacting our Data Protection Officer.
- 8.3 *Right to refuse us to transfer or disclose their personal data to our contractors* - You can exercise your right to refuse us to transfer or disclose your personal data to our contractors by contacting our Data Protection Officer at any time. Your personal data will be either irreversibly anonymised (and the anonymised information will be retained) or securely destroyed.
- 8.4 *Updating personal data* - We will take reasonable steps to try to ensure that your personal data is accurate. You can update your personal data at any time by (a) mobile applications; or (b) contacting our Data Protection Officer.
- 8.5 *Contacting Data Protection Officer*

You have the right to send your request to our Data Protection Officer at any time with any of the following methods to fulfil the above purposes set out in this section:

By email (please send your registered username (if applicable), name, email and mobile number to [dataprotectionofficer@greateagle.com.hk](mailto:dataprotectionofficer@greateagle.com.hk)); or

By post (please send your registered username (if applicable), name, email and mobile number to Data Protection Officer, 33rd Floor, Great Eagle Centre, 23 Harbour Road, Wanchai, Hong Kong).

- 8.6 The English version of this Privacy Policy shall prevail wherever there is any inconsistency or conflict between the English and Chinese version.

Last updated on 12 September 2018





鷹君集團有限公司  
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## **PRIVACY POLICY**

### **GDPR Addendum**

This Addendum applies in circumstances where the privacy practices of Great Eagle Holdings Limited (“Great Eagle”) and its subsidiaries (collectively, “Great Eagle Group”, “we”, “us” or “our”) are subject to the EU General Data Protection Regulation (“GDPR”). This will be the case if you are based in the European Economic Area (the EEA) during your interactions with us (other than where you are in the EEA solely for travel purposes).

This Addendum should be read in conjunction with the Privacy Policy of Great Eagle. In this Addendum, we set out further information on our processing activities and details of the rights which you have under the GDPR. We reserve the right, at our discretion, to change, modify, add, or remove any parts from this Addendum at any time. You are encouraged to review this Addendum from time to time for updates periodically. Your continued use of our Services after such revisions are posted means you elect to accept these changes.

#### **1. Why We Collect Your Data the Legal Grounds for Processing**

- 1.1 We can collect personally identifiable information about you as more particularly described in section 3 of the Privacy Policy and the purposes for collection and use of these personal data are described in section 4 of the Privacy Policy.
- 1.2 Personal data will only be processed if there is at least one lawful basis as follows:
  - 1.2.1 *Consent* – where you have given consent to the processing of your personal data for one or more specific purpose. You may withdraw your consent to the use of your personal data by contacting us as set out in section 8 of the Privacy Policy.
  - 1.2.2 *Contract performance* – where processing is necessary for the performance of a contract to which you are a party or in order to take steps at your request subject prior to entering into a contract.
  - 1.2.3 *Legal obligation* – where we need to use your personal data to comply with our legal obligations.
  - 1.2.4 *Vital interests* - where we need to process your personal data in order to protect the vital interests of you or another natural person, e.g. where you require urgent assistance.
  - 1.2.5 *Public interest* - where processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us.

- 1.2.6 *Legitimate interests* - where we have a legitimate interest in using your information. We will only rely on this legal ground if we consider that our interest in using your personal data for the relevant purpose is not outweighed by any interests that you may have, or any prejudice that you may suffer, from the relevant use of your personal data.
- 1.3 Occasionally we will collect and handle sensitive personal data, for example, when we handle requests for special requirements relating to personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs and data concerning health. Where we process this category of data, this will be done only on any or more of the following basis:
- 1.3.1 *Consent* – where you have given consent to the processing of your personal data for one or more specific purpose. By providing us with this information, you expressly consent to our use of your sensitive person information in accordance with this Privacy Policy. You may withdraw your consent to the use of your personal data by contacting us as set out in section 8 of the Privacy Policy.
- 1.3.2 *Vital interest* - where we need to process your personal data in order to protect the vital interests of you or another natural person where you or the other person is physically or legally incapable of giving consent.
- 1.3.3 *Legal claims* - where your personal data is necessary for us to establish, exercise of defend any legal claims.
- 1.3.4 *Substantial public interest* - where we need to process your personal data for reasons of substantial public interest set out in EU law or the laws of the member state in which you are based.
- 1.3.5 *Public interest in area of public health* - where we need to process your personal data for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health, set out in EU law or the laws of the member state in which you are based.

## **2. Children’s Data**

- 2.1 We do not collect personal data about children under the age of 16. In the event any personal data of children under the age of 16 were collected, we will delete the data when any individual contacts us in accordance with section 8 of the Privacy Policy.
- 2.2 Individuals under the age of 18 must obtain the consent of an individual who holds parental responsibility for them prior to providing us with their personal data.

## **3. International Transfer**

- 3.1 Services on the internet are accessible globally so collection and transmission of person data is not always limited to one country. We may transfer your personal information we collect about you and your personal information may be stored and processed, in countries other than the country in which the information was originally collected that may have less stringent data protection laws than the country in which you initially provided the information. If and to the extent that we do so, we will ensure that appropriate measures

are in place to comply with our obligations under applicable law governing such transfers. However, our collection, storage and use of your personal data will at all times continue to be governed by the Privacy Policy.

- 3.2 By providing any personal information to us, you fully understand and unambiguously consent to the transfer and processing of such personal information. If you object to your personal information being transferred or used in this manner, please do not register with or use our Site and App.

#### **4. Retention Periods**

- 4.1 We only retain the personal data collected from you for as long as your account is active or otherwise for a limited period as long as we need it to fulfil the purposes for which we have initially collected it, unless otherwise required by law. We will retain and use information as necessary to comply with our legal obligations, resolve disputes and enforce our agreements.

#### **5. Your Rights and Contacting Us**

- 5.1 Under the EU GDPR, you have the following rights, which apply in certain circumstances and subject to certain restriction, in relation to your personal data:

- 5.1.1 the right to access your personal data;
- 5.1.2 the right to request the rectification and/or erasure of your personal data;
- 5.1.3 the right to restrict the use of your personal data;
- 5.1.4 the right to object to the processing of your personal data;
- 5.1.5 where our processing of personal data is based on you having provided your consent or the processing is necessary for the performance of a contract with you, you have the right to receive your personal data, which you provided to us, in a structured, commonly used and machine-readable format or to require us to transmit that data to another controller; and
- 5.1.6 where our processing of your personal data is based on you having provided consent, the right to withdraw your consent to the processing at any time.

- 5.2 If you wish to exercise any of the rights set out above or if you have any questions about this GDPR Addendum, please contact us directly at [dataprotectionofficer@greateagle.com.hk](mailto:dataprotectionofficer@greateagle.com.hk).

Last updated on 12 September 2018