

Lee Gardens Red Packet QR Code Game

Terms & Conditions

1. The game promotion period is from 10 January 2020 to 23 February 2020, both dates inclusive.
2. Daily winning chance applies, while stocks last.
3. Participants must register as a Lee Gardens Club member to get the e-Laisee, i.e. a Lee Gardens Area HK\$5 e-Gift Certificate.
4. Throughout the promotion period, each mobile number can win a maximum of one e-Laisee
5. Lee Gardens Area e-Gift Certificates are valid at the designated merchants only. The terms and conditions of the merchants apply. For the full terms and conditions, please refer to the details on Lee Gardens official website / Lee Gardens mobile App.
6. Lee Gardens Area e-Gift Certificates will be delivered to customers via SMS. A smartphone (iOS, Android) with the Lee Gardens Club Mobile App and Internet access is required to access the e-Gift Certificate.
7. Participants shall ensure a correct mobile phone number is provided, otherwise Hysan Marketing Services Limited shall not be responsible for any non-delivery arising therefrom, and the e-Gift Certificate will not be re-issued.
8. Lee Gardens Area e-Gift Certificates are valid only with the validation of Hysan Marketing Services Limited.
9. Lee Gardens Area e-Gift Certificates are valid for one-time use only.
10. Lee Gardens Area e-Gift Certificates cannot be altered or exchanged for cash or other certificates of any value. No change or refund will be given when using the e-Gift Certificate.
11. Hysan Marketing Services Limited reserves the right to cancel a participant's eligibility if they win a prize by dishonest means, such as registering with a mobile number not owned by that participant, participating with a plug-in, or via any other abnormal approaches.
12. Hysan Marketing Services Limited and the respective merchants reserves the right to end or extend the above redemption programme and/or to modify, revise or change any of these terms and conditions at any time without any prior notice and without incurring any liability to any party whatsoever. Hysan Marketing Services Limited reserves the right to make the final decision in case of any dispute.
13. No person other than the customer and Hysan (which includes its successors and assigns) will have any right under the Contracts (Rights of Third Parties) Ordinance to enforce or enjoy the benefit of any of the provision of these Terms and Conditions.
14. The customer has the right to request access to his/her personal data held by Hysan and to request a correction of any personal data that is incorrect. Hysan has the right to charge a reasonable fee for processing and complying with a data access request. Requests for access or correction of a customer's personal data, or enquiries about the policies and practices of Hysan in relation to personal data should be made in writing to data.officer@hysan.com.hk.
15. In the case of any conflict or inconsistency between the English and Chinese versions of these terms and conditions, the English version shall prevail.

Hysan's Group Privacy Policy Statement

This is the Privacy Policy of the Hysan Group. The Hysan Group comprises Hysan Development Company Limited and each of its subsidiaries including Hysan Leasing Company Limited, Hysan Marketing Services Limited, Hysan Property Management Limited, Stangard Limited, Hysan Corporate Services Limited, Bamboo Grove Recreational Services Limited, as well as their holdings companies, branches, representative offices and affiliates (collectively the "**Group**", "**Hysan**", "**we**", "**us**" or "**our**").

As a responsible business Hysan respects personal data privacy and is committed to fully implementing and complying with the data protection principles under the Personal Data (Privacy) Ordinance (Cap. 486 of the Laws of Hong Kong) (the "**Ordinance**").

Our privacy principles are:

- Hysan only collects personal data which we believe to be relevant and required to conduct our business.
- Hysan will use your personal data only for the purpose for which the data is collected or for a directly related purpose, unless consent for a new purpose is obtained from you.
- Hysan will keep your personal data accurate and up-to-date.
- Hysan will not transfer or disclose your personal data to any entity that is not a Group entity or not a party as detailed in this Privacy Policy without your consent unless it is required by law or it was previously notified to you.
- Hysan has implemented various physical, electronic and management measures to safeguard and secure the personal data we collect.

Please read the following Privacy Policy to understand how Hysan handles your personal data collected through various means, including its websites, mobile applications, social media platforms, application

forms and other collection channels. By providing your personal data to us, you are consenting to this Privacy Policy and the collection, use, access, transfer, storage and processing of your personal data as described in this Privacy Policy.

1. Kinds of Personal Data Collected and Held

1.1 We collect and hold the following broad categories of personal data ("**Data**") depending on our engagement with you:

- a) **Tenant records:** including name, contact details, company name, business title and other information supplied by tenants and collected in connection with tenant services and related activities;
- b) **Customer records:** including salutation, name, gender, marital status, month of birth, age range, company name, business title, education background, telephone number, fax number, email address, correspondence address, membership numbers, photograph, relevant log-in information that customers use to access our products and services, information regarding customer spending, and if you log-in to our websites, applications or WiFi services via your social media accounts, we may collect such log-in details and other information you have made available on the relevant social media site, and other information supplied by customers and collected in connection with our loyalty club programmes and surveys;
- c) **Personnel records:** including Hysan personnel details, job particulars, details of salary, payments, benefits, leave and training records, group medical insurance records, mandatory provident schemes participation, performance appraisals and disciplinary matters;
- d) **Consultant and contractor records:** including name, contact details and other information of any individual employed or engaged by service providers in the fields of construction, information technology, marketing and other areas providing necessary services required by Hysan;
- e) **Records collected on webserver, mobile or digital media:** including email addresses, browsing preferences, MAC addresses and IP addresses (whereas they constitute personal data under specific circumstances that the addresses can be used to identify an individual) collected for newsletter subscription, online enquiries, membership log-in or otherwise. Note that if the WiFi function on your device has been enabled, the MAC address and IP address of your device may be collected, even if the device is not connected to our WiFi services;
- f) **Other records:** including records of visitors to the premises operated by Hysan, members of the public making enquiries or responding to our surveys, business partners, officers, shareholders, investors and other operational and administrative records that contain personal data, and other information as may be set out in the relevant form or collection channel.

2. Purposes for which the Data are Collected and Used

2.1 We may use the Data for the following main purposes (or any directly related purpose):

- a) **Tenant records:** for providing tenant and property management services and related activities, maintaining tenant accounts, managing moving in and out of Hysan premises or car parks, processing rental receivables, responding to and follow up enquiries;
- b) **Customer records:** for communication, providing rewards or benefits for loyalty club programmes, administration of loyalty club membership including verification of identity, accumulating and redeeming reward points, handling requests for and providing services, membership or benefits, providing, targeting and customising marketing communications and materials to you (subject to your prior consent), market research and analysis, data analytics or any other purposes which the customer has been notified of and consented to;
- c) **Personnel records:** for recruitment and human resource management purposes, relating to such matters as employees' appointment, employment benefits, termination, performance appraisal and discipline;
- d) **Consultant and contractor records:** engaging, monitoring, managing and appraising relationships with consultants and contractors who are and/or engage or employ individuals to provide services to Hysan;
- e) **Records collected on webserver, mobile or digital media:** for sending newsletters to subscribers registered through websites and providing marketing materials and replies to enquiries, and for market research and data analytics; and
- f) **Other records:** for various purposes varying according to the nature of the records, including for administration and operation of the Hysan premises, handling enquiries from members of the public and carrying out daily business.
- g) **General:**
 - for communicating with you;
 - for our daily operation and administration;
 - for market research and data analytics;
 - subject to your consent, for direct marketing (see below paragraph on direct marketing);
 - for identification and verification;

- for enforcing our legal rights;
 - for complying with legal or regulatory obligations applicable to any Group member;
 - for handling your enquiries or requests; and
 - for any other purposes to which you may from time to time agree.
- 2.2 If we wish to use your personal data for a new purpose (other than the purposes (if any directly related purpose) outlined above, we will obtain your consent in advance.
- 2.3 We will not sell or rent the Data provided to us, or knowingly or intentionally use or share the Data in ways unrelated to the purposes aforementioned.

3. Disclosure and Transfer of Data

- 3.1 We may disclose and transfer the Data you provide or which are otherwise collected by us to the following parties and other persons who we consider appropriate (whether local or overseas) in connection with the purposes set out above (or any directly related purpose):
- a) any member of the Group (including different divisions within each Group entity);
 - b) any of our agents, professional advisers, contractors, service providers, or any persons under a duty of confidentiality to us;
 - c) our business associates whom you may from time to time agree;
 - d) our successors or assigns (whether actual or proposed) under an acquisition, sale or restructuring of the business and/or assets of any member of the Group, or any assignee of our rights;
 - e) any person to whom we are under an obligation to make disclosure under the requirements of law or a court order of any jurisdiction or to any government or law enforcement authorities or administrative organs as requested;
 - f) any person to whom we believe in good faith that disclosure is otherwise necessary or advisable including to protect our rights or properties or in circumstances which we consider to be related to any of the purposes for which the Data are collected; and
 - g) to any person when we have reason to believe that disclosing the Data to such person is necessary to identify, contact or bring or defend legal action against someone, e.g. anyone who may be causing interference with our rights or properties, whether intentionally or otherwise, or when anyone else could be harmed by such activities.
- 3.2 The Data you provide to us may also be sourced from or transferred to other jurisdictions outside Hong Kong for the purposes mentioned above, and you explicitly consent to and accept all risks of such transfer. We will try to ensure, as far as possible and practicable, that Data sourced or transferred outside Hong Kong is protected to standards in line with the requirements of the Ordinance, subject to any other requirements and limitations of the particular jurisdiction.

4. Data Security and Retention

- 4.1 Subject to any legal and regulatory requirements, the Data you provide to us will be kept by us in the appropriate form only for as long as is necessary to fulfil the purposes mentioned above, after which it will be destroyed.
- 4.2 In order to ensure the correct use and to maintain the accuracy of Data collected from you, as well as prevent unauthorised or accidental access, processing, erasure or other use of the Data, we have implemented various physical, electronic and management measures to safeguard and secure the Data we collect and have appropriate security policies in place. However, we cannot guarantee that data transmission over the internet or other media is completely secure.

5. Our Commitment to Children's Privacy

Protecting the privacy of children is our primary concern. If you are under the age of 18, you should obtain consent from your parent or guardian before providing us with your Data.

6. Direct Marketing

- 6.1 We may only use your personal data for the purposes of direct marketing if you have consented to such use. You may indicate your consent to us to use of your personal data for direct marketing by selecting the relevant option in the appropriate online or paper form submitted to us.
- 6.2 You can withdraw your consent for use by us of your Data for direct marketing at any time by sending an email to our Data Privacy Officer at data.officer@hysan.com.hk or as indicated in the relevant materials.

7. Cookies and Other Tracking Mechanisms

- 7.1 We may automatically collect information about your computer or device, including where available your IP address, device ID, MAC address, operating system and browser type, when you access our website or applications or use our WiFi services. This is statistical data which does not reveal your identity. Similarly, cookies may be left on the hard drive of your computer, mobile phone or other devices.
- 7.2 Cookies are small text files that are stored on your browser and the hard drive of your computer, mobile or other handheld device. We use cookies and other tracking mechanisms mentioned

above for system administration, to track information about your use of our websites or mobile applications and to automatically improve and personalise your browsing and user experience (e.g. Google Analytics and functionality cookies). By accessing our website or applications, you provide your consent to the use of cookies pursuant to the above. You may choose to accept or refuse cookies by adjusting the settings of your web browser. However, if you select to refuse cookies, you may not be able to fully access certain functions or information contained on our website or applications.

- 7.3 We use analytics tools to automatically measure how visitors interact with content on our websites and applications, or in relation to your use of our WiFi services. If you log-in to our websites, applications or WiFi services via your social media accounts, we may collect information you have made available on the relevant social media site and link your interaction with us to such information. Where you have consented to direct marketing, we may also engage social media sites or send you push notifications via mobile applications to show you advertisements that are customised (which may be automatic) based on analysis of any Data we may retain in relation to you, your interactions with us and/or aggregated and anonymous non-personally identifiable information we collect via analytics technologies.
- 7.4 We may feature embedded links, “share” buttons or widgets on our websites or applications to enable you to connect to third party sites, including social media sites. These third party sites may set 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 Data. You should read the relevant third-party sites for their privacy policies before submitting any Data to these sites. We have no control over and are not responsible or liable for the contents of third party sites or third party posts on our social media accounts.
- 7.5 We may use analytic technologies to collect non-personally identifiable information about you on an aggregated and anonymous basis, such as information captured by devices in real-time during your visit (e.g. visitor counts and information), and those which are collected via our WiFi services through your WiFi enabled device (even if it is not connected to our WiFi services) (e.g. IP address, MAC address, location data, visitor statistics and preferences, activity patterns and device information). If you do not wish us to collect the aforesaid information via our WiFi services, then you can disable the WiFi on your device. We use this data for research and analytics purposes, including helping us to study activity patterns and visitor preferences in order to improve service experience. If you are a member of one of our loyalty programmes, and you sign in to use our WiFi services through your membership log-in details, such non-personally identifiable information may be linked to any Data we may retain in relation to you, and if you have consented to receive direct marketing, we may provide you with targeted advertisements, content, features, deals and offers through push notifications via our mobile applications. Otherwise this data will not be linked to any Data we may retain in relation to you, and cannot be used to identify or re-identify you.

8. How to Access or Correct Your Data or Contact Us

- 8.1 You are entitled to access or correct any Data related to you held by us. If you wish to obtain a copy of any of your Data or if you believe that the Data related to you which we collect and maintain is inaccurate, please contact our Data Privacy Officer at data.officer@hysan.com.hk or at the following address:
- Data Privacy Officer
Hysan Development Company Limited
50/F, Lee Garden One
33 Hysan Avenue
Causeway Bay
Hong Kong
- 8.2 In accordance with the terms of the Ordinance, we have the right to charge a reasonable fee for the processing of any data access request.
- 8.3 You may also contact us at the above details for any other data privacy related matters.

9. Access to Data Privacy Policy

- 9.1 You may access and obtain a copy of our Data Privacy Policy, as amended from time to time, on our website at www.hysan.com.hk/privacy-policy-statement/¹ so that you are always informed of the way we collect and use your Data.
- 9.2 We amend or update this Privacy Policy from time to time without prior notice. You are advised to visit the above website regularly for the latest version of this Policy.

10. Language

¹ Drafting Note: To be updated to show the relevant website.

- 10.1 This Notice is written in the English language and may be translated into other languages. In the event of any inconsistency between the English version and the translated version of this notice, the English version shall prevail.

Last version date: Jan 2019

Personal Information Collection Statement (PICS)

Collection of your personal information

Lee Gardens Club ("**Lee Gardens Club**") is a program promoted and operated by Hysan Marketing Services Limited. You are seeking to apply to become a member of Lee Gardens Club, and have completed the application form to which this PICS is attached.

Please read the following PICS to understand how the Hysan Group handles your personal data and your rights under the Personal Data (Privacy) Ordinance (Cap. 486 of the Laws of Hong Kong) (the "**Ordinance**"). The Hysan Group comprises Hysan Development Company Limited and each of its subsidiaries including Hysan Leasing Company Limited, Hysan Marketing Services Limited, Hysan Property Management Limited, Stangard Limited, Hysan Corporate Services Limited, Bamboo Grove Recreational Services Limited, as well as their holdings companies, branches, representative offices and affiliates (collectively the "**Group**", "**Hysan**", "**we**", "**us**" or "**our**").

1. Data Collection

- 1.1 The types of personal data ("**Data**") we collect from you may include:
- h) your personal information, e.g. your salutation, name, age group, month of birth, spending record;
 - i) your contact information, e.g. telephone number, residential address, office address, mailing address, email address, and fax number;
 - j) your business and educational information, such as company name, business title and education background;
 - k) your membership numbers and relevant log-in information that you will use to access our products and services;
 - l) browsing preferences, MAC address and/or IP address (in so far as they may be deemed to amount to personal data). Note that if the WiFi function on your device has been enabled, the MAC address and/or IP address of your device may be collected, even if the device is not connected to our WiFi services; and
 - m) other information as may be set out in the relevant form or collection channel.
- 1.2 We may also collect non-personally identifiable information about you, such as browsing preference of our websites or mobile applications, personal preferences and comments, and responses to promotional offers and surveys.
- 1.3 In certain situations, we may ask you to provide the Data of other individuals to us, e.g. emergency contacts, information of your family members. By providing us with such Data, you represent to us that you have obtained those individuals' authorisation and/or consent to the use, disclosure and transfer of their Data. We shall not be responsible for any claim whatsoever from any party in the absence of such consent.
- 1.4 In the relevant form or collection channel it may be indicated whether any Data is obligatory or voluntary. If you fail to supply Data that is marked as obligatory, we may not be able to process your Lee Gardens Club membership application, engage with you for the intended purposes or provide the relevant products and services fully or at all.

2. Purposes for which the Data are Collected and Used

- 2.1 We may use the personal data you provide for one or more of the following purposes (or any directly related purpose):
- a) To enable us or the Participating Merchants² to provide rewards or benefits to you in relation to your Lee Gardens Club membership;
 - b) For use of the online services available at any of our websites, mobile applications and/or through other telecommunication channels, in particular to administer the "Lee Gardens" Mobile Application;
 - c) For market research and/or data analytics, including to better understand customer behavior, for customer and tenant relationship management purposes, and to improve the business operations and marketing strategy of Hysan and our Partners;
 - d) Subject to your consent, to send you marketing and promotional updates on our and our Partners' activities, products and services from time to time and to customise and tailor such marketing communications to you; "**our Partners**" include our retail merchants (including

² "**Participating Merchants**" means select merchants that are part of the Lee Gardens Club program, namely retail merchants located at any Hong Kong premises operated by a Group Company, including the Lee Gardens Area (Hysan Place, Lee Garden One, Lee Garden Two, Lee Garden Five, Lee Garden Six, Leighton, Lee Theatre, One Hysan Avenue and 25 Lan Fong Road). Details refer to the Terms and Conditions of Lee Gardens Club.

- the Participating Merchants), office tenants, co-branding partners, and business partners (who may be engaged in businesses such as retail, banking, finance, credit/smart/stored value cards, insurance, charity/not-for-profit causes, entertainment, food & beverage, and other businesses as we may notify you);
- e) To confirm your identity and verify that you are a member of Lee Gardens Club;
 - f) To administer your Lee Gardens Club membership;
 - g) To communicate with you by post, email, digital media (including through push notification via the "Lee Gardens" mobile application ("App"), telephone, SMS or other means regarding your Lee Gardens Club membership or your use of our products, services, mobile applications and/or websites;
 - h) To handle your requests for services, membership or benefits;
 - i) To assess your continued eligibility as a member of Lee Gardens Club;
 - j) For reservations with or through us;
 - k) For daily operation and administration of our business and premises;
 - l) To enforce our rights under contracts, including to collect or recover any debt owed by you to us;
 - m) To comply with legal or regulatory obligations applicable to any Group member;
 - n) To connect to our WiFi services and to provide you with automatic personalised location-based services and content, including targeted advertisements, content, features, deals and offers if you have consented to the receipt of direct marketing materials;
 - o) For the use of any member of the Group in connection with any of the above purposes and/or any of the services such entities may be offering to you from time to time;
 - p) To handle your enquiries or requests, e.g. lost & found;
 - q) For any other purposes to which you may from time to time agree; and
 - r) To carry out our obligations to you under the Terms and Conditions for Membership of "Lee Gardens Club".
- 2.2 We will not sell or rent the Data provided to us, or knowingly or intentionally use or share the Data in ways unrelated to the purposes aforementioned.

3. Disclosure and Transfer of Personal Data

- 3.1 We may disclose and transfer the Data you provide or which are otherwise collected by us to the following parties (whether local or overseas) in connection with the purposes set out above (or any directly related purpose):
- a) any member of the Group (including different divisions within each Group entity);
 - b) any of our agents, professional advisers (including lawyers and auditors), contractors, subcontractors or third party service providers who provide administrative, financial, data processing, telecommunications, computer, payment, marketing and research, information technology, data analytics or other services in connection with the operation and maintenance of our business, or any persons under a duty of confidentiality to us;
 - c) our Partners;
 - d) our successors or assigns (whether actual or proposed) under an acquisition, sale or restructuring of the business and/or assets of any member of the Group, or any assignee of our rights;
 - e) any person to whom we are under an obligation to make disclosure under the requirements of law or a court order of any jurisdiction or to any government or law enforcement authorities or administrative organs as requested;
 - f) any person to whom we believe in good faith that disclosure is otherwise necessary or advisable including to protect our rights or properties or in circumstances which we consider to be related to any of the purposes for which the Data are collected; and
 - g) to any person when we have reason to believe that disclosing the Data to such person is necessary to identify, contact or bring or defend legal action against someone, e.g. anyone who may be causing interference with our rights or properties, whether intentionally or otherwise, or when anyone else could be harmed by such activities.
- 3.2 The Data you provide to us may also be sourced from or transferred to other jurisdictions outside Hong Kong for the purposes mentioned above, and you explicitly consent to and accept all risks of such transfer. We will try to ensure, as far as possible and practicable, that Data sourced or transferred outside Hong Kong is protected to standards in line with the requirements of the Ordinance, subject to any other requirements and limitations of the particular jurisdiction.

4. Direct Marketing

- 4.1 We intend to use your Data (and transfer your Data to the parties set out in paragraphs 3.1(a)-(d) above) to send you marketing and promotional materials through the post, email, digital media (including through push notification via the App), telephone, SMS and other means, in relation to activities in Hong Kong or overseas such as:

- a) **Retail Events and Promotions:** (i) promotions and events hosted, sponsored or organised by us or any member of the Group or our Partners; (ii) any rewards or discounts, offers, membership, privileges, advantages or benefits offered by each member of the Group or our Partners;
- b) **Tenants / Residents Events and Promotions:** promotions and events which we or any member of the Group host, sponsor, organise or participate in, e.g. clubhouse activities for residents, privileges and events for tenants.
- c) **Properties for Sale or Leasing:** office, retail and/or residential properties offered for sale or leasing by us or any member of the Group and related services;
- d) **Charity and Community:** solicitations for donations or contributions for charitable, social enterprise or non-profit making purposes, or community / social corporate responsibility events or activities which we or any member of the Group host, sponsor, organise or participate in; and
- e) **Others:** other activities, events, businesses or promotions as may be carried out by the Group and notified to you (as set out in the relevant form or collection channel) from time to time.

collectively the "**Marketing Activities**".

We will only use your Data for the purposes of Marketing Activities if you have consented to such use.

- 4.2 You always have ultimate choice and control over the type of information you would like to receive from us. When you complete and return your membership application or other forms to us or use our online services, you can indicate your consent to us to use your Data for the purposes of the Marketing Activities. You can withdraw your consent for use by us of your Data for the Marketing Activities, at any time, by sending an email to our Data Privacy Officer at data.officer@hysan.com.hk or as indicated in the relevant materials.

5. **Cookies and Other Tracking Mechanisms**

- 5.1 We may automatically collect information about your computer or device, including where available your IP address, device ID, MAC address, operating system and browser type. This is statistical data which does not reveal your identity. Similarly, cookies may be left on the hard drive of your computer, mobile phone or other devices.
- 5.2 Cookies are small text files that are stored on your browser and the hard drive of your computer, mobile or other handheld device. We use cookies and other tracking mechanisms mentioned above for system administration, to track information about your use of our websites or mobile applications and to automatically improve and personalize your browsing and user experience. Please refer to our Privacy Policy for further information regarding how we use cookies: www.hysan.com.hk/privacy-policy-statement/. By accessing our website or applications, you provide your consent to the use of cookies pursuant to our Privacy Policy. You may choose to accept or refuse cookies by adjusting the settings of your web browser. However, if you select to refuse cookies, you may not be able to fully access certain functions or information contained on our website or applications.
- 5.3 We use analytics tools to automatically measure how visitors interact with content on our websites and applications, or in relation to your use of our WiFi services. If you log-in to our websites, applications or WiFi services via your social media accounts, we may collect information you have made available on the relevant social media site and link your interaction with us to such information. Where you have consented to direct marketing, we may also engage social media sites or send you push notifications via the App to show you advertisements that are customised (which may be automatic) based on analysis of any Data we may retain in relation to you, your interactions with us and/or aggregated and anonymous non-personally identifiable information we collect via analytics technologies.
- 5.4 We may feature embedded links, "share" buttons or widgets on our websites or applications to enable you to connect to third party sites, including social media sites. These third party sites may set 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 Data. You should read the relevant third-party sites for their privacy policies before submitting any Data to these sites. We have no control over and are not responsible or liable for the contents of third party sites or third party posts on our social media accounts.
- 5.5 We may use analytic technologies to collect non-personally identifiable information about you on an aggregated and anonymous basis, such as information captured by devices in real-time during your visit (e.g. visitor counts and information), and those which are collected via our WiFi services through your WiFi enabled device (even if it is not connected to our WiFi services) (e.g. IP address, MAC address, location data, visitor statistics and preferences, activity patterns and device information). If you do not wish us to collect the aforesaid information via our WiFi services, then you can disable the WiFi function on your device. We use this data for research and analytics purposes, including helping us to study activity patterns and visitor preferences in order to improve service experience. If you sign in to use our WiFi services through your Lee Gardens

Club membership log-in details, such non-personally identifiable information may be linked to any Data we may retain in relation to you, and if you have consented to receive direct marketing, we may provide you with targeted advertisements, content, features, deals and offers through push notifications via the App.

- 5.6 We may use Push Notification function to provide automatic personalised services and content. If you have enabled this function, we may provide you with targeted advertisements, content, features, deals and offers through push notifications via the App.

6. Data Security and Retention

- 6.1 The personal data you provide to us will be kept by us in the appropriate form only for as long as is necessary to fulfil the purposes (or a directly related purpose) mentioned above, after which it will be destroyed. We will retain your personal data for fifteen (15) months following the termination of your membership, in order to enable us to address any enquires or disputes that arise between us and you concerning your Lee Gardens Club membership. Only anonymised data, where it is not possible to ascertain your identity, is retained for analytical and statistical purposes for more than fifteen (15) months following the termination of your membership.
- 6.2 In order to ensure the correct use and to maintain the accuracy of the personal data collected from you, as well as preventing unauthorised or accidental access, processing, erasure or other use of the personal data, we have implemented various physical, electronic and management measures to safeguard and secure the personal data we collect.

7. How to Access or Correct Your Data

- 7.1 You are entitled to access or correct any Data related to you held by us. If you wish to obtain a copy of any of your Data or if you believe that the Data related to you which we collect and maintain is inaccurate, please contact our Data Privacy Officer at data.officer@hysan.com.hk or at the following address:
Data Privacy Officer
Hysan Development Company Limited
50/F, Lee Garden One
33 Hysan Avenue
Causeway Bay
Hong Kong
- 7.2 In accordance with the terms of the Ordinance, we have the right to charge a reasonable fee for the processing of any data access request.
- 7.3 You may also contact us at the above details for any other data privacy related matters.

8. Language

This PICS is written in the English language and may be translated into other languages. In the event of any inconsistency between the English version and the translated version of this PICS, the English version shall prevail.

Last Version Date: Sep 2019