Privacy Policy Statement

1. <u>PLEDGE</u>

1.1 Fred Kan & Co. recognises the importance of proper treatment of personal data. It pledges to meet fully recognised standards of personal data privacy protection in complying with the requirements of the Personal Data (Privacy) Ordinance.

2. <u>COLLECTION</u>

2.1 Types

There are two broad types of personal data held by Fred Kan & Co. They are personal data contained in:

(a) *Personnel records* which include records containing personal details, job particulars, details of salary, payments, benefits, performance appraisals, disciplinary matters of every employee of Fred Kan & Co.;

(b) *Other records* which include administration and operational files containing personal data supplied to Fred Kan & Co. by applicants and participants in connection with the functions and activities administered by Fred Kan & Co. and by suppliers and others with whom it communicates in the course of its operation.

2.2 Purposes

(a) Fred Kan & Co. collects personal data for the purposes of fulfilling its operational and management obligations.

(b) Personal data held in:

(*i*) *Personnel records* are kept for human resource management purposes relating to employees' appointment, payment of salary and benefits, filing tax returns, performance appraisals, discipline and termination;

(*ii*) Other records are kept for different purposes depending on the nature of the record which may include the conduct of training courses, events and community activities organized by Fred Kan & Co., handling of enquiries, provision and acquisition of services and administration of office functions and activities.

(c) Fred Kan & Co. will observe fully the requirements that personal data are collected for a lawful purpose that directly relates to a function or activity of the Academy, are adequate but not excessive in relation to that purpose and are not kept longer than is necessary for the fulfilment of the purpose for which the data are used.

2.3 Means

(a) Fred Kan & Co. collects personal data by various means including the use of printed or electronic forms, face to face interviews and advertisements that solicit the submission of personal information.

(b) Fred Kan & Co. will observe fully the requirement that personal data are collected by means which are lawful and fair in the circumstances of the case.

3. <u>ACCESS</u>

3.1 All persons who are subjects of personal data held by Fred Kan & Co. are entitled to:

(a) ask what information Fred Kan & Co. holds about them;

(b) request access to their own personal data:

- 1. within a reasonable time;
- 2. in a reasonable manner;
- 3. at a fee as prescribed by Fred Kan & Co. from time to time; and

(c) request the correction of their own personal data

All subject access / correction requests of personal data held by Fred Kan & Co. should be made in writing using the specified <u>Data Access Request Form (OPS003)</u>.

4. <u>ENQUIRY</u>

4.1 This privacy policy statement is posted on Fred Kan & Co. website at www.fredkan.com and made available at the reception of its office.

4.2 All access / correction requests and any enquiries about this privacy policy statement should be directed to:

Fred Kan & Co.

3104-06, 31/F, Central Plaza,

18 Harbour Road, Wanchai

Tel: (852) 25881318 Email: kan_law1984@fredkan.com

5. <u>USE OF COOKIES</u>

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