

退休長者協會有限公司

私隱政策

(版本: 2018 年 10 月 2 日)

1. 前言

- 1.1 我們的政策是保證個人資料私隱的保障全面符合《個人資料（私隱）條例》（香港法例第 486 章）的要求。
- 1.2 為此，我們會確保我們的員工及義工在處理個人資料時，以最嚴格的保安及保密標準保護個人資料。
- 1.3 本政策適用於所有在本會登記或與本會有往來的個人。
- 1.4 當我們認為必要或適當時，本政策將不時地更新、修訂、調整、重刊及更改，因此，我們強烈建議那些已經提供其個人資料給我們的個人，經常在我們的網站檢閱本政策。

2. 定義及詮釋

- 2.1 「ARE」、「本協會」或「我們」指退休長者協會有限公司。
- 2.2 「ARE 會員」指已經在本會登記參加活動的人士。
- 2.3 「百龍匯智」指百龍匯智社會企業計劃，本協會營辦這個社會企業計劃之目的，是讓長者找到工作機會。
- 2.4 「資料當事人」指經由本協會收集、貯存、使用和/或另外處理，包括但不限於本協會會員、義工、服務者和用人單位。
- 2.5 「關連公司」指 ARE 的附屬公司、ARE 持有權益的公司，由 ARE 共同控制的公司(包括但不限於百龍匯智社會企業有限公司) 和 ARE 的控股公司。
- 2.6 「服務者」指個人在「百龍匯智」登記成為服務者，並有意尋找工作機會，為用人單位提供服務。
- 2.7 「用人單位」指已加入「百龍匯智」以尋找服務者的服務或參加這計劃的活動的公司、團體或個人。
- 2.8 「工作配對」指由「百龍匯智」提供的工作配對服務。
- 2.9 單詞詞彙的意思包括其複數，而複數詞彙的意思包括其單數。
- 2.10 本守則所指的一性別包括其他性別。

3. 收集及使用個人資料的目的

- 3.1 收集和使用你的個人資料之目的包括:
 - (a) 為 ARE 日常運作，包括但不限於「百龍匯智」的運作和 ARE 會員的服務；
 - (b) 為處理我們服務的用戶費和/或刊物及我們的活動的登記；
 - (c) 為工作配對的一般目的，跟進個案和提供「百龍匯智」的其他服務，(有關該資料當事人本身是服務者或申請成為服務者) 評估服務者是否適合職位空缺和協助服務者尋找工作機會；
 - (d) 為工作配對的一般目的，跟進個案和提供「百龍匯智」的其他服務，(有關該資料當事人本身是服務者或申請成為服務者) 使用資料選擇服務者候選人和披露該些資料給候選人考慮及處理用人單位參與「百龍匯智」；
 - (e) 獲取統計資料，分析使用我們的服務，推廣我們的服務和活動，計劃將來的服務和活動，及準備和/或印製研究材料，教育和提倡目的；
 - (f) 協助 ARE 計劃發展將來的運作、服務和活動，及計劃發展將來的市場營銷、推廣和內部目的；
 - (g) 處理跟進查詢、要求和投訴；及
 - (h) 為直接推廣我們及/或我們商業夥伴(只限經由我們通知或發送)及關連公司之推廣資料，包括招聘、求職、義務工作尋找、培訓、進修課程、教育、講座、考察、展覽、人力資源、商務、創業、銀髮市場產品及服務、健康及保健、旅遊、餐飲、飲食、娛

樂、非牟利團體及活動、籌款及募捐。

4. 被收集的個人資料種類

- 4.1 本協會可以收集資料當事人的個人特徵信息，例如姓名、身份證號碼、地址、電郵地址、電話號碼、性別、年齡、教育、嗜好、個人興趣；當資料當事人遇到緊急情形，我們可以聯絡的緊急聯絡人的聯絡資料，包括他/她與該資料當事人的關係。
- 4.2 當一位資料當事人本身是(或申請成為)服務者，本協會可以收集其額外信息，例如經驗、工作歷史、工作優先權和服務/工作記錄。
- 4.3 如果收集的個人資料用作直接市場營銷，本協會可以收集信息包括該資料當事人的姓名、地址、電郵地址、電話號碼、年齡和性別。

5. 個人資料的披露或轉移

- 5.1 除了本政策內列出的例外情形，本協會將採取切實可行步驟保管所有資料當事人的機密個人信息。
- 5.2 為了促進我們的服務和設施作出的目的(或也可以制成) 而提供給相關的資料當事人和/或處理正在進行與資料當事人有關的事務，本協會可以發送和披露相關資料當事人的個人資料給關連公司。
- 5.3 本協會可以隨時聘用第三方的供應商或外部服務提供商，協助我們的營運或保管記錄、行政或其他內部目的，因此，我們可以發送和披露資料當事人的個人資料給那些根據保密義務而獲得本協會授權的供應商或服務提供商。
- 5.4 除了獲得資料當事人的同意和根據本政策內列明有關使用發送或披露個人資料的目的，本協會可以發送或披露該資料當事人的個人資料給我們的業務伙伴。
- 5.5 除非法律要求我們這樣做或我們相信有關措施是必須的，本協會才會發送和披露資料當事人的個人資料：
 - (a) 遵照法律或適用的條例；
 - (b) 保障及維護我們的權利及財產(包括我們的員工和義工) 和/或已經與本協會登記的人士；
 - (c) 保障防止不正確使用或未經授權使用我們的網站、服務和/或設施；
 - (d) 保障我們的使用者或公眾人士的個人安全或財產安全。

6. 個人資料的保存

- 6.1 為了符合本政策所列出收集資料的目的，本協會將按所須時間把收集的個人資料，安全地保持維護在我們的系統內。
- 6.2 如果資料當事人的個人資料已經被收集及用作營銷，該資料當事人可以用書面文件要求我們停止使用其資料。當我們接到該要求，我們會在兩星期內處理該要求和停止使用該些資料作直接營銷。
- 6.3 如果我們須要遵守合理法律義務、滿足監管要求、解決相關資料當事人涉及的糾紛，防止欺詐和濫用、處理投訴，或執行這項政策或本協會對於該資料使用者適用的規則，本協會可以在該資料當事人與本協會終止關係後，仍然可以保留該資料當事人的個人資料。

7. 個人資料存取或修改

- 7.1 資料當事人可以用書面文件聯絡我們，有權查閱或改正由我們保持的其個人資料。
- 7.2 為了遵守直接相關和必要的資料查閱要求，我們保留收取一定的費用的權利。

8. 聯絡我們

如閣下對我們的私隱政策有任何問題，歡迎電郵至 info@hkare.org 聯絡我們。

Association of Retired Elderly Limited

Privacy Policy

(Version: 2 October 2018)

1. Preamble

- 1.1 It is our policy to pledge to meet fully with the requirements of the Personal Data (Privacy) Ordinance (Cap.486 of the Laws of Hong Kong).
- 1.2 In doing so, we will ensure compliance by our staff members and volunteers to the strictest standards of security and confidentiality.
- 1.3 This policy applies to all individuals registered or dealt with the Association.
- 1.4 This policy may be updated, revised, modified, reposted and changed from time to time as we deem necessary or appropriate. Therefore individuals who have provided personal data to us are strongly recommended to review this Policy frequently at our website.

2. Definitions and Interpretation

- 2.1 “**ARE**”, “**Association**” or “**We**” means Association of Retired Elderly Limited.
- 2.2 “**ARE Member**” means a person registered with the Association to participate in our activities.
- 2.3 “**ARE Wisdom**” means ARE Wisdom Social Enterprise Project, which is one of the social enterprise projects run by the Association aiming at enabling elder persons to obtain work opportunities.
- 2.4 “**Data Subject**” means an individual whose personal data that the Association collects, keeps, uses and/or otherwise handles, including without limitation, the ARE Members, the Volunteers, the Service Providers and the Service Recipients.
- 2.5 “**Related Companies**” means subsidiaries of ARE, companies in which ARE has equity interests, companies under common control as ARE (including without limitation ARE Wisdom Social Enterprise Limited) and holding company of ARE.
- 2.6 “**Service Provider**” means an individual registered under ARE Wisdom as a “Service Provider” with a view to seeking work opportunities to provide services to the Service Recipients.
- 2.7 “**Service Recipient**” means a person registered under ARE Wisdom as a “Service Recipient” with a view to seeking services of the Service Providers and/or participating in activities under ARE Wisdom.
- 2.8 “**Work Matching**” means the work matching services provided under ARE Wisdom.
- 2.9 Words in the singular include the plural and in the plural include the singular.
- 2.10 A reference to one gender includes a reference to the other genders.

3. Purpose of Collection and Use of Personal Data

- 3.1 The purposes for which your personal data are collected and used include:
 - (a) for the daily operation of ARE, including without limitation our services to the ARE Members and the operation of ARE Wisdom;
 - (b) for handling the subscription for our services and/or publications and the enrolment of our activities;
 - (c) (in relation to a Data Subject who is or applies to be a Service Provider) to assist the Service Provider to seek work opportunities and assess his suitability for a job vacancy; and for the general purposes for Work Matching, case monitoring and the provision of our other services under ARE Wisdom;
 - (d) (in relation to a Data Subject who is or applies to be a Service Recipient) to use the data for selecting Service Providers candidates and disclose such data for such candidates’ consideration and to handle the Service Recipient’s participation in the activities of ARE Wisdom, and for the general purposes for Work Matching , case monitoring and the provision of our other services under ARE Wisdom;
 - (e) to obtain statistics for analysing the use of our services, promoting our services and activities, planning for future services and activities, and preparing and/or publishing materials for research, education and advocacy purposes;
 - (f) to assist ARE to plan and develop future operation, services and activities, and for the marketing, promoting and internal purposes relating to future plans and developments;
 - (g) to handle and follow up on enquiries, requests and complaints; and
 - (h) for direct marketing of our services, activities and products and/or those of our business partners (restricted to those informed by or sent through us only) and of the Related Companies, including recruitment, job seeking, volunteer work seeking, training, courses, education, seminars, study tours, exhibitions, human resources, business, entrepreneurship,

silver hair market products and services, health & healthcare, travel, catering, food & beverages, entertainment, non-profit making organizations & activities, fundraising and donation.

4. Types of Personal Data Collected

- 4.1 The Association may collect a Data Subject's personally identifiable information such as name, identity card number, address, email address, telephone number, sex, age, education, hobby, personal interest, and the contact particulars of and relationship with a person with whom we should contact in case of an emergency happens on the Data Subject.
- 4.2 For a Data Subject who is (or applies to be) a Service Provider, the Association may also collect his additional information such as experience, work history, work preference and service/ work records.
- 4.3 If the personal data are collected and used for direct marketing, the Association may collect information including the Data Subject's name, address, email address, telephone number, age and gender.

5. Disclosure or Transfer of Personal Data

- 5.1 The Association shall take all practicable steps to keep the personal data of all Data Subjects confidential save and except in the circumstances set out in this Policy.
- 5.2 For the purposes of furthering our services and facilities made (or to be made) available to the relevant Data Subject and/or for dealing with the on-going matters with the Data Subject, the Association may transmit and disclose the personal data of the relevant Data Subject to the Related Companies.
- 5.3 The Association may engage third party suppliers or external service providers from time to time to assist us in our operation or for record keeping, administration or other internal purposes. As such, we may transmit and disclose the personal data of the Data Subjects to such suppliers or service providers who have been duly authorized by us under a duty of confidentiality.
- 5.4 The Association may transmit and disclose the personal data of a Data Subject to our business partners only if the Data Subject has given his consent and the use of the personal data so transmitted or disclosed is only for the purposes specified in this Policy.
- 5.5 The Association may disclose or transfer the personal data of any Data Subject if we are required to do so by law or we believe that such action is necessary to:
 - (a) comply with the applicable laws and regulations;
 - (b) protect and/or defend the rights and property of the Association (including our staff members and volunteers) and/or persons who have registered with us;
 - (c) safeguard against misuse or unauthorized use of our website, services and/or facilities;
 - (d) protect the personal safety or property of persons dealing with us or the public.

6. Retention of Personal Data

- 6.1 The Association will keep and maintain securely the personal data that it has collected in its system for the period necessary to fulfil the purposes for which the data were collected as set out in this Policy.
- 6.2 If a Data Subject's personal data have been collected for direct marketing, the Data Subject may contact us in writing requesting us to cease to use such data. Upon receipt of such request, we will process the request in two weeks' time and cease to use those data for direct marketing.
- 6.3 The Association may retain a Data Subject's personal data even after he has ceased relationship with the Association (for example, the Data Subject ceases to be an ARE Member) if retention is reasonably necessary to comply with our legal obligations, meet regulatory requirements, resolve disputes that the relevant Data Subject may be involved, prevent fraud and abuse, handle a complaint, or enforce this Policy or such rules of the Association applicable to that Data Subject.

7. Access to or Request for Correction of Personal Data

- 7.1 A Data Subject is entitled to request access to or make correction of his personal data kept with us by contacting us in writing.
- 7.2 We reserve the right to charge a fee which is directly related to and necessary for complying with a data access request.

8. Contacting Us

If you have any questions about our privacy policy, please feel free to contact us by email (info@hkare.org).