

## 香港學聯旅遊有限公司

### 個人資料（私隱）條例 - 收集個人資料聲明（「本聲明」）

為依從個人資料（私隱）條例（「條例」），本公司特此通知閣下以下事項：

(1) 在要求或查詢產品或服務時，或當本公司提供與產品、服務及申請相關之其他服務時，閣下有需要不時向本公司提供個人資料。若閣下未能提供該等資料，可能會令本公司無法處理閣下的要求或向閣下提供或繼續提供訂購及服務及/或其他相關服務。本公司亦可能會在日常業務運作的過程中向閣下收集資料，例如當閣下向本公司提出預訂服務或於一般情況下以口頭或書面形式與本公司溝通。

#### (2) 個人資料收集目的

閣下的個人資料可能會用作下列用途：

- (i) 處理查詢，預訂及服務的申請；
- (ii) 為閣下提供訂購、申請或服務及處理閣下就本公司的產品或服務提出的要求，包括但不限於要求增加、更改、取消產品或服務、付款安排、投訴或要求復效等；
- (iii) 執行與所提供的申請、查詢及服務相關的功能及活動，如核實身份、資料核對及復效安排等；
- (iv) 行使本公司因不時向閣下提供訂購產品或服務而享有的權利，例如向閣下要求繳交款項；
- (v) 設計產品及服務以提升本公司的服務質素；
- (vi) 製作數據及進行研究；
- (vii) 營銷服務、產品及其他標的（詳情請參閱本聲明第(4)段）；
- (viii) 履行根據下列對本公司具有約束力或適用或期望其遵守的就披露及使用資料的義務、規定及/或安排：
  - (a) 不論於香港特別行政區（「香港」）境內或境外及不論目前或將來存在的對其具法律約束力或適用的任何法律；

- (b) 不論於香港境內或境外及不論目前或將來存在的任何法律、監管、政府、稅務、執法或其他機關，或第三方服務供應者的自律監管或行業組織或協會所作出或發出的任何指引或指導；
- (ix) 允許本公司的權益或業務的實際或建議承讓人、受讓人、參與人或附屬參與人，就擬涉及的轉讓、出讓、參與或附屬參與的交易進行評估；及
- (x) 與上述有關的其他用途。

### (3) 個人資料的轉移

存於本公司的個人資料將會保密，但本公司可能會向以下各方透露該等資料作本聲明第(2)段所列出的用途，下列機構如何處理與使用該等資料本公司概不承擔任何責任：

- (i) 任何代理人、承包人、院校、或就本公司之業務運作，包括行政、電訊、電腦、付款、資料處理、儲存、調查和追收款項或就與申請、查詢及相關之其他服務，向本公司提供服務的第三方服務供應者（如航空公司、住宿、旅行社、保險公司、各國駐港辦事處/領事館、郵遞、印刷、電訊公司、相關院校或其他必須知悉有關資料的第三方及其代理機構或關聯公司）；
- (ii) 任何對本公司負有保密責任的其他人士；
- (iii) 與本公司有或將有商業往來的第三方供應者及各院校；
- (iv) 本公司為遵守任何法律規定，或根據法律、監管、政府、稅務、執法或其他機關，保險，或第三方服務供應者或各院校的自律監管或行業組織或協會所作出或發出對本公司有約束力或適用或期望其遵守的規則、規例、實務守則、指引或指導，或根據本公司向本地或外地的法律、監管、政府、稅務、執法或其他機關，或保險或第三方服務供應者的自律監管或行業組織或協會的任何合約或其他承諾（以上不論於香港境內或境外及不論目前或將來存在的），而有義務或以其他方式被要求向其作出披露的任何人士或機構；
- (v) 本公司的權益或業務的任何實際或建議承讓人、受讓人、參與人或附屬參與人；
- (vi) 第三方獎賞、客戶或會員、聯盟公司、品牌合作及優惠計劃供應商；

- (vii) 本公司的品牌合作夥伴（該等品牌合作夥伴的名稱會在有關服務和產品的申請表格及/或宣傳資料上列明）；及
- (viii) 本公司為就本聲明第(2)(vii)段所列明的用途而聘用的外判服務供應商(包括但不限於郵寄公司、電訊公司、電話銷售和直接促銷代理、電話服務中心、數據處理公司和資訊科技公司)。  
該等資料可能被轉移至香港境外。

#### (4) 在直接促銷中使用個人資料

本公司可能把閣下的個人資料用於直接促銷，除非本公司已取得閣下的同意（包括表示不反對），否則本公司並不可以如此使用閣下的個人資料，但條例所指明的豁免情況除外。就此，請注意：

- (i) 本公司可能把本公司不時持有閣下的姓名、聯絡資料、產品及服務組合資料、交易模式及行為、財務背景及人口統計數據用於直接促銷；
- (ii) 本公司可能就下列服務、產品及促銷標的進行促銷：
  - (a) 旅遊、升學、遊學、國際三証、保險及相關服務及產品；
  - (b) 獎賞、客戶或會員或優惠計劃及相關服務及產品；及
  - (c) 本公司的品牌合作夥伴提供之服務及產品（該等品牌合作夥伴的名稱會在有關服務和產品的申請表格及/或宣傳資料上列明）：
- (iii) 上述服務、產品及促銷標的可能由本公司及/或下列各方提供：
  - (a) 第三方獎賞、客戶或會員、品牌合作或優惠計劃供應商；及/或
  - (b) 本公司的品牌合作夥伴（該等品牌合作夥伴的名稱會在有關服務和產品的申請表格及/或宣傳資料上列明）。

如閣下不希望本公司使用閣下的資料作上述直接促銷用途，閣下可通知本公司行使閣下的選擇權拒絕促銷。閣下可根據本聲明第(5)段所提供的聯絡方法以書面向本公司提出有關要求，或於有關的申請表格內向本公司表達閣下拒絕促銷的意願（如適用）。

(5) 查閱及改正資料權利

根據條例規定，閣下有權查詢本公司是否持有閣下的個人資料及要求索取該等資料的複本（查閱資料要求），並要求本公司就不準確的資料作出改正。閣下如欲行使有關權利，請以書面經以下聯絡方法向本公司提出：

尖沙咀梳士巴利道 3 號星光行 1233 室

香港學聯旅遊有限公司

個人資料保障組

電郵地址：sincerity@hkst.com

根據規例，本公司有權就辦理任何查閱資料要求收取合理費用。

(6) 閣下亦有權根據本聲明第(5)段所提供的聯絡方法向本公司的個人資料保障組索取本公司有關個人資料私隱的政策及實務，並獲告知本公司持有的個人資料的種類。

(7) 本公司只會根據上述任何用途上的合理需要或適用法例或規例規定的期間保存閣下的個人資料。

(8) 如閣下對本聲明有任何疑問，請按本聲明第(5) 段所提供的聯絡方法以書面向本公司提出。

(9) 本聲明不會限制客戶在條例下所享有的權利。

(10) 本公司保留修改本聲明的權利。

2023 年 2 月  
本公司發出

## Hong Kong Student Travel Ltd (the "Company")

### The Personal Data (Privacy) Ordinance - Personal Information Collection Statement (the "Statement")

In compliance with the Personal Data (Privacy) Ordinance ("the Ordinance"), the Company would like to inform you of the following:

(1) From time to time, it may be necessary for you to supply the Company with personal data in connection with your application for or provision by the Company of products or services as well as the carrying out by the Company of other services relating to these products or services. Failure to supply such data may result in the Company being unable to process your application or to provide or continue to provide the products and services and/or the related services to you. Data may also be collected by the Company from you in the ordinary course of the Company's business, for example, when you want to make a reservation of service with the Company or generally communicate verbally or in writing with the Company.

#### (2) PURPOSES FOR COLLECTING PERSONAL DATA

Personal data relating to you may be used for the following purposes:

- (i) processing enquiries or requests for our products or services;
- (ii) providing our products or services to you or processing requests made by you in relation to our products or services, including but not limited to requests for addition, alteration or deletion of products or services or setting up of direct debit facilities as well as complaint or reinstatement of services;
- (iii) performing functions and activities incidental to the provision of products and services such as identity verification, data matching and reinstatement arrangement;

- (iv) exercising the Company's rights in connection with the provision of products or services to you from time to time, for example, to request payment from you;
- (v) designing products and services with a view to improving the Company's quality of service;
- (vi) preparing statistics and conducting research;
- (vii) marketing services, products and other subjects (please see further details in paragraph (4) of this Statement);
- (viii) complying with the obligations, requirements and/or arrangements for disclosing and using data that bind on or apply to (the Company) or that it is expected to comply according to:
  - (a) any law binding or applying to it within or outside the Hong Kong Special Administrative Region ("Hong Kong" ) existing currently and in the future;
  - (b) any guidelines or guidance given or issued by any legal, regulatory, governmental, tax, law enforcement or other authorities, or by self-regulatory bodies or industry bodies/associations of a third party services providers within or outside Hong Kong and existing currently or in the future; or
- (ix) enabling an actual or proposed assignee, transferee, participant or sub-participant of the Company's rights or business to evaluate the transaction intended to be the subject of the assignment, transfer, participation or sub-participation; and
- (x) any other purposes relating to the purposes listed above.

### (3) TRANSFER OF PERSONAL DATA

Personal data held by the Company relating to you will be kept confidential but the Company may provide such data to the following parties for the purposes set out in paragraph (2) of this Statement. The Company shall not bear any responsibility of the following parties on the use the personal data thereof:

- (i) any agent, contractor, college/school or third party service provider who provides services to the Company in connection with the operation of the business of the Company including administrative, telecommunications, computer, payment, data processing, storage, investigation and debt collection services as well as other services incidental to the provision of our products and services by the Company (such as airline company, accommodations, travel agencies, insurance company, consulate, post office/courier, printer, data processing companies, college/school or a third party including its agent or related company which as a matter of necessity has to know about the personal data);
- (ii) any other person or entity under a duty of confidentiality to the Company which has undertaken to keep such data confidential;
- (iii) companies and college/school with whom the Company has or will have commercial dealings;
- (iv) any person or entity to whom the Company is under an obligation or otherwise required to make disclosure (a) under the requirements of any law; (b) under the requirements of the rules, regulations, codes of practice, guidelines or guidance given or issued by any legal, regulatory, governmental, tax, law enforcement or other authorities, insurance company or self-regulatory or industry bodies or associations or third party service providers or college/school binding on or applying to the Company with which the Company is expected to comply; or (c) under any contractual or other commitment of the Company with local or foreign legal, regulatory, governmental, tax, law enforcement or other authorities, or insurance company or self-regulatory or industry bodies or associations of third party service providers, all of which may be within or outside Hong Kong and may be existing currently or in the future;
- (v) any actual or proposed assignee, transferee, participant or sub-participant of the Company's rights or business;

- (vi) third party reward, loyalty, co-branding and privileges program providers;
- (vii) co-branding partners of the Company and/or any member of the Company (the names of such co-branding partners can be found in the application form(s) and/or promotional material for the relevant services and products, as the case may be); and
- (viii) external service providers (including but not limited to mailing houses, telecommunication companies, telemarketing and direct sales agents, call centres, data processing companies and information technology companies) that the Company engages for the purposes set out in paragraph (2)(vii) of this Statement.  
Such information may be transferred to a place outside Hong Kong.

#### (4) USE OF PERSONAL DATA IN DIRECT MARKETING

The Company may use your personal data in direct marketing. Save in the circumstances exempted in the Ordinance, the Company cannot use your personal data without your consent (which includes an indication of no objection). In this connection, please note that:

- (i) the name, contact details, products and services portfolio information, transaction pattern and behavior, financial background and demographic data of you held by the Company from time to time may be used by the Company in direct marketing;
- (ii) the following services, products and subjects may be marketed:
  - (a) travel information, overseas studies, study tours, ISIC card application, insurance and related services and products;
  - (b) reward, loyalty or privileges programs and related services and products; and
  - (c) services and products offered by the co-branding partners of the Company (the names of such co-branding partners can be found in the application form(s) and/or promotional material for the relevant services and products, as the case may be);



- (iii) the above services, products and subjects may be provided by the Company and/or:
- (a) third party reward, loyalty, co-branding or privileges program providers; and/or
  - (b) co-branding partners of the Company (the names of such co-branding partners can be found in the application form(s) and/or promotional material for the relevant services and products, as the case may be).

If you do not wish the Company to use your personal data in direct marketing as described above, you may exercise your opt-out right by notifying the Company. You may write to the Corporate Data Protection Team of the Company at the address or e-mail address provided in paragraph (5) of this Statement, or provide the Company with your opt-out choice in the relevant application form (if applicable).

#### (5) DATA ACCESS AND CORRECTION RIGHT

In accordance with the Ordinance, you have the right to check whether the Company holds personal data about you and to require the Company to provide a copy of such data (data access right) and to correct the data which is inaccurate. Such requests can be made in writing to the Corporate Data Protection Team of the Company at the following address or e-mail address:

The Corporate Data Protection Team

Hong Kong Student Travel Ltd

*Room 1233, 12 Floor,*

Star House

3 Salisbury Road,

Tsimshatsui, Kowloon

Hong Kong

e-mail address : [sincerity@hkst.com](mailto:sincerity@hkst.com)

According to the Ordinance, the Company has the right to charge a reasonable fee for the processing of any data access request.

(6) You also have the right, by writing to the Company's Corporate Data Protection Team at the address or e-mail address provided in paragraph (5) of this Statement, to request for the Company's policies and practices in relation to personal data and to be informed of the kinds of personal data held by the Company.

(7) The Company keeps your personal data only for a period reasonably necessary for any of the above purposes or as prescribed by the applicable laws or regulations.

(8) Should you have any query with this Statement, please do not hesitate to contact The Corporate Data Protection Team of the Company at the address or e-mail address provided in paragraph (5) of this Statement.

(9) Nothing in this Statement shall limit the rights of the customers under the Ordinance.

(10) The Company retains the right to change this Statement.

*February 2023*  
*Issued by the Company*