

S+ Rewards Loyalty Programme Privacy Policy Statement

It is the policy of **Sino Real Estate Agency Limited** ("we" or "**Sino**") to comply with the requirements of the Personal Data (Privacy) Ordinance, Chapter 486 of the laws of the Hong Kong SAR. In doing so, we will ensure compliance with strict standards of security and confidentiality.

We safeguard all information provided by members ("**Members**") of our S+ Rewards Loyalty Programme (the "**Programme**").

Upon registration, we will collect your personal data including name, Facebook ID & profile picture, WeChat ID & profile picture, Apple ID & profile picture, gender, contact number, day and month of birth, age range, living district, working district, household income range, whether you are a car owner, life stage, license plate number and credit card information ("**Personal Data**"), in the mobile phone application for the Programme ("**App**").

If Personal Data are collected in the process of making enquiries or submitting applications for services provided by different operations within the Sino Group, Members will be informed via the respective Personal Information Collection Statements of our Apps of such purposes and uses, including the extent of their transfer and disclosure; and the right of access to and correction of the collected Personal Data.

Once we have obtained your Personal Data, it will be maintained securely in our system. Only authorized staff, who have been properly trained, will be permitted access to such Personal Data, and we shall not release such Personal Data to any external parties except those parties set out in our Personal Information Collection Statement without Members' agreement.

The Members' Personal Data collected would be retained only until membership expires or Members request to terminate the membership. Membership termination request may be submitted via e-mail, telephone or in-person visit to concierge or customer service centre, details as follows:

Sino Mall	tmtplaza	Olympian City	Citywalk
Location	1/F Concierge, tmtplaza	UG/F Concierge, Olympian City (Phase 1) UG/F Concierge, Olympian City (Phase 2) UG/F Concierge, Olympian City (Phase 3)	UG/F Concierge, Citywalk UG/F Concierge, Citywalk 2
Tel. no.	2450 7782	2740 4108	3926 5708
Email	srewards.tmtpl@sino.com	srewards.oc@sino.com	srewards.cw@sino.com

Sino Mall	China Hong Kong City	Gold Coast Piazza	Tsim Sha Tsui Centre & Empire Centre
Location	UG/F Concierge, China Hong Kong City	1/F Customer Service Centre, Gold Coast Piazza	G/F Concierge, Tsim Sha Tsui Centre
Tel. no.	2736 0113	2452 6566	2721 5489
Email	srewards.chkc@sino.com	srewards.gcp@sino.com	srewards.tstc@sino.com
Sino Mall	Island Resort Mall	Sino Plaza	One North
Location	UG/F Concierge, Island Resort Mall	G/F Concierge, Sino Plaza	G/F Concierge, One North
Tel. no.	2598 0711 / 3407 4220	2834 3309	2669 1928
Email	srewards.irm@sino.com	srewards.sp@sino.com	srewards.on@sino.com
Hotels	Hong Kong Gold Coast Hotel	The Fullerton Ocean Park Hotel Hong Kong	
Location	Cafe Lagoon, LG/F, Hong Kong Gold Coast Hotel	Lighthouse Café, 1/F, 3 Ocean Drive, Aberdeen, Hong Kong	
Tel. no.	2452 8448 / 2452 8866	2166 7388	
Email	srewards@goldcoasthotel.com.hk	fop.srewards@fullertonhotels.com	
Other Locations	Cameron Plaza	Hong Kong Pacific Centre	The Humphreys
Tel. no.	2723 6679	2723 1248	2145 0308
Email	srewards.cmpz@sino.com	srewards.hkpc@sino.com	srewards.tj@sino.com
Other Locations	Sunshine Plaza	Sing-Ho Finance Building	The Hennessy
Tel. no.	2362 8516	2834 3309	2834 3309
Email	srewards.sunp@sino.com	srewards.sp@sino.com	srewards.sp@sino.com
Other Locations	The Johnston	Hollywood Centre	The Centrium
Tel. no.	2145 0308	2793 1196	2537 1539
Email	srewards.tj@sino.com	srewards.hc@sino.com	srewards.tc@sino.com

Upon receipt of a membership termination request from a Member, the relevant record will be deleted permanently from the database as soon as practicable. Membership will automatically expire without prior notice if there is no recorded activity for a period of 36 months and any remaining points have expired.

We shall use our best endeavours to ensure that the privacy of Members is properly protected. In terms of encryption application, we have adopted both Google and Apple standard secure coding. Our Apps are secured with Secure Sockets Layer (SSL) technology so the Member's Personal Data stays safe. However, given the nature of the Internet, we cannot guarantee that there is "perfect security".

In order to provide Members with more information and services, we use third party content providers and service providers, and provide links to other websites. These third parties may collect Members' Personal Data when users

make use of their services. These third parties adhere to their own privacy policies and practices and our Privacy Policy Statement does not cover such third party practices.

Should Members have any queries about our privacy policy and practices, please write via e-mail to Head of Marketing & Promotions at rmphead@sino.com.

In the event of discrepancies or inconsistencies between the English and Chinese versions of this Privacy Policy Statement, the English version shall prevail.

Personal Information Collection Statement

Sino Real Estate Agency Limited ("we", "**Sino**") complies with the requirements of the Personal Data (Privacy) Ordinance, Chapter 486 of the laws of the Hong Kong SAR, is committed to safeguarding your privacy, and notifies you of certain matters when collecting information from you. This statement may change from time to time, so please check back periodically.

For the purposes of this Personal Information Collection Statement, "**Sino Group**" includes Sino Club Limited, Sino Real Estate Agency Limited, Sino Estates Management Limited, Sino Security Services Limited, Best Result Environmental Services Limited, Sino Parking Services Limited, The Royal Pacific Hotel & Towers, City Garden Hotel, Hong Kong Gold Coast Hotel, Island Pacific Hotel, The Pottinger Hong Kong, The Olympian Hong Kong, The Fullerton Ocean Park Hotel Hong Kong, Sino Administration Services Limited, and their respective holding companies, subsidiaries, fellow subsidiaries of the holding companies, associated companies and affiliates.

COLLECTION OF DATA

At the time of registration or application of membership, services and activities in physical or online format and at other times when using this mobile application ("**App**") for S+ Rewards Loyalty Programme ("**Programme**") or submitting a request or enquiry, and/or participating in any activities on social media and/ or filling in surveys and/ or using of website(s) you may be asked to provide us with personally identifiable information, including but not limited to your name, Facebook ID & profile picture, WeChat ID & profile picture, Apple ID & profile picture, gender, contact number, day and month of birth, age range, living district, working district, household income range, whether you are a car owner, life stage, license plate number and credit card details ("**Personal Data**").

The provision of your Personal Data is voluntary. However, if you do not provide us with your Personal Data, we may not be able to register you as a Member of the Programme and provide the services, activities or information in full, and we may not be able to fulfill your requests or respond to your inquiries.

If you provide Personal data of any third parties to us, you must ensure that you have obtained the third party's consent and that the third party is fully aware of our Privacy Policy, including this Personal Information Collection Statement.

We shall use our best endeavours to ensure that the privacy of Members is properly protected. In terms of encryption application, we have adopted both Google and Apple standard secure coding. Our App is secured with Secure Sockets Layer (SSL) technology so the Member's Personal Data stays safe.

PURPOSE OF COLLECTION AND USE OF PERSONAL DATA

The Personal Data we collect will be used for the following purposes: -

1. to consider and process your application for membership;
2. to provide, administer and arrange for the various aspects of the Programme, including but not limited to member registration, points accrual, referral bonus accrual, rewards redemption, social feed and gamification (collection of badges);
3. to support recognition of license plate number and conduct in-app payment or auto-payment of parking fee when you register and use Contactless Parking service;
4. to conduct research and/or analysis and/or to compile statistics to understand your needs so as to design new and/or enhance existing facilities, services and/or products or for any other purposes in connection with our business, the business of any member of the Sino Group or any Relevant Person;
5. to collect data for identity verification and records and to maintain contact lists for non-marketing correspondence;
6. to operate internal control, resolve disputes, troubleshoot problems and enforce our terms and conditions;
7. to facilitate our communications, and/or the communications of any member of the Sino Group with you, including feedback from you on your needs and expectations of facilities, services and/or products from us, any member of the Sino Group and/or any Relevant Person, following up on comments, surveys, enquiries and other messages that you submit to us through our website, mobile application and/or other means, and contacting you regarding administrative notices and communications relevant to the Programme and your use of this App and to respond to your requests; sending you administrative communications about our services provided to you as well as business-related announcements about the Sino Group or its members;
8. with your consent, to deliver information to you that we believe you may have interest in, such as targeted banners, new services and products and other promotions and marketing materials (please refer to the "Direct Marketing" section below);
9. to comply with any disclosure requirements under any applicable law;
10. to prevent, detect and/or investigate activities that may be illegal or reasonably be suspected of committing any offence;
11. to protect the rights, property or safety of any member of the Sino Group and Relevant Person, our employees, members, and others; and
12. any other purpose directly relating or incidental to the above purposes.

DIRECT MARKETING

We intend to use your name and contact information for marketing and promotion of property, hotel or hospitality-

related products, services, facilities and activities offered by the Sino Group, as well as the retail goods and services offered by the merchants of tmtplaza, Olympian City, Citywalk, China Hong Kong City, and Gold Coast Piazza, Tsim Sha Tsui Centre & Empire Centre, Island Resort mall, Sino Plaza and One North (collectively the "**Sino Malls**"); Hong Kong Gold Coast Hotel, The Fullerton Ocean Park Hotel Hong Kong (collectively, the "Hotels") and Cameron Plaza/ Hong Kong Pacific Centre/ The Humphreys/ Sunshine Plaza/ Sing-Ho Finance Building/ The Hennessy/ The Johnston/ Hollywood Centre/ The Centrium (collectively, the "**Other Locations**"). We may not so use your personal information for direct marketing purposes unless we have received your consent (or your indication of no objection) to the intended use. Please note:

1. the following classes of products, services and subjects may be marketed:
 - a. investment, sale and leasing services with respect to industrial properties, offices, shops, shopping malls, residential properties and storage spaces;
 - b. property management services such as parking, hygiene, cleaning and/or security services;
 - c. corporate information;
 - d. arts, cultural, leisure and/or entertainment services;
 - e. environmental protection, volunteer and community events services;
 - f. hotels, hospitality-related products and services, conference facilities and services, travel, tours, spas, sailing, yachts, and country clubs;
 - g. Retail promotion of food & beverages, restaurants, catering, confectionary & groceries, wine and liquor, household products, general merchandise, health & beauty, pharmaceuticals, baby/ children/ educational or pet products & services, stationery & books, fashion items & accessories, jewelry & watches, furniture, sports & leisure equipment, electronics & electrical appliances, music, motor related services, financial services/products, travel/ hospitality/ lifestyle services, and e-commerce (including trading and payment platforms and online auctions);
 - h. membership, loyalty, bonus point and reward programmes managed or operated by any member of Sino Group;
2. the above products, services and subjects may be provided by us and/or any member of the Sino Group and/or any merchants of Sino Malls/Hotels/ Other Locations;
3. in addition to marketing the above products, services and subjects ourselves, we may provide your name and contact information to other members of the Sino Group for use by them in direct marketing those products, services and subjects, and we require your written consent (which includes an indication of no objection) for that purpose.

DISCLOSURE AND TRANSFER OF DATA

Your information will not generally be disclosed or transferred to any other party in a form that would identify you except in the following circumstances:

1. We may disclose/transfer your Personal Data to any member of the Sino Group for purposes above mentioned;

2. If we use content providers or third party suppliers or service providers to facilitate the Programme, our operation, management or administration thereof, including marketing and research, distribution, data processing, telecommunications, digital, computer, computer technology outsourcing, cloud service, accounting, auditing, payment and other purposes that we deem necessary to maintain, service and improve the Programme, we may provide your Personal Data to these content providers or suppliers or service providers;
3. We may disclose your Personal Data to government, law enforcement, regulatory or other authorities when we believe in good faith that the law requires it.

In addition, your Personal Data will be accessed by, disclosed or transferred to divisions within the Sino Group for purposes as above mentioned.

Please also see our Privacy Policy Statement which sets out our general privacy policy and practices in respect of our collection, holding, use, processing and disclosure of your Personal Data.

ACCESS TO DATA

You have the right to request access to, and correction of, Personal Data about you held by us. For data access requests, we may require payment of reasonable charges incurred by us in relation to administering and complying with your request.

If you need to check whether we hold your Personal Data or if you wish to have access to or correct any Personal Data relating to you which is inaccurate, please write via e-mail to Head of Marketing & Promotions at rmphead@sino.com.

This Personal Information Collection Statement is also part of and is subject to our Privacy Policies.