

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, email address, gender, contact number, day and month of birth, age range, living district, working district, household income range, whether you are a car owner, and life stage ("**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 Member's 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, details as follows:

Sino Mall	tmtplaza	Olympian City	Citywalk
Location	1/F Concierge, tmtplaza	UG/F Concierge, Olympian City (Phase 1) G/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

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 srewards@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" or "**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.

COLLECTION OF DATA

At the time of registration and at other times when using this mobile application ("**App**") for S⁺ Rewards Loyalty Programme ("**Programme**"), 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, e-mail address, gender, contact number, day and month of birth, age range, living district, working district, household income range, whether you are a car owner, and life stage ("**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.]

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 AND USE OF PERSONAL DATA

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

1. to administer the various aspects of the Programme, including but not limited to member registration, points accrual, referral bonus accrual, points transfer, rewards redemption,

social feed, gamification (collection of badges), sending birthday gifts to friends, and chatbot service;

2. to monitor use of the App and to help its further development;
3. to compile aggregate statistics about our Members and to analyze App usage;
4. to analyse the spending habits and behaviours of Members;
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 contact you regarding administrative notices and communications relevant to the Programme and your use of this App and to respond to your requests; and
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).

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 and Citywalk (collectively the "**Sino Malls**"). 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.

We also intend to share your name and contact information with members of the Sino Group which includes Sino Club Limited, Sino Estates Management Limited, Sino Security Services Limited, Sino Parking Services Limited, Sino Hotels (Holdings) Limited, Gold Coast Yacht and Country Club Limited, Best Result Environmental Services Limited and their respective holding companies, subsidiaries, affiliates in order to enable them to market property, hotel or hospitality-related products, services, facilities and activities offered to you by Sino Group and retail goods and services offered by merchants of the Sino Malls and other shopping malls or hotels owned, operated or managed by any member of Sino Group. We may not share your personal data for direct marketing purposes unless we have received your written consent or your indication of no objection to the intended disclosure.

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. 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, 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.
2. 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.
3. With your consent, we may share your day and month of birth with your connected friends within the Programme, to enable your friends to send you birthday wishes / gifts.

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 srewards@sino.com.