

Online Companion Limited

Privacy Policy Statement

And

Personal Information Collection Statement

A. Privacy Policy Statement

1. Purpose

Online Companion Limited (the “Company” or “We”) respects the privacy of personal data and is committed to complying with the requirements of the applicable laws including the Personal Data (Privacy) Ordinance (the “PDPO”) and the Data Protection Principles contained in it.

This document comprises two parts, the Privacy Policy Statement (Part A), a general statement about our privacy policies and practices in relation to the personal data we handle, and the Company’s personal information collection statement (Part B) (“PICS”). When or before we collect personal data from you as a Data Subject, the PICS will be provided to you in accordance with the PDPO.

2. Collection of personal data

(1) We collect personal data for lawful purposes and by lawful and fair means.

The data we collect in relation to a specified purpose shall be adequate but not excessive in respect of the purpose. Upon and before collection of data from an individual (“Data Subject” under the PDPO), we will explicitly inform him/her:

- (a) The purpose(s) for which the data is to be collected and the groups of persons to whom the data may be transferred;
- (b) Whether it is obligatory or voluntary to supply the data, and the consequences of not supplying obligatory data;
- (c) His/her right to request access to and correction of data held by us; and
- (d) The person responsible for handling data access and correction requests.

(2) We collect personal data of Data Subjects in the course of our daily operations. Generally, these Data Subjects include:

- (a) Job applicants
- (b) Staff members
- (c) Applicants for admission to counseling services
- (d) Donors

- (e) Participants in the Company’s counseling services, activities and programs

We may also collect personal data of other individuals who are also Data Subjects¹. Our handling of this personal data, unless specified otherwise in our communication with the Data Subjects, follows the terms of this statement and the relevant PICS.

- (3) We may collect personal data directly from a Data Subject when he/she interacts with us².
- (4) We may also collect personal data of a Data Subject *indirectly* from third parties³.
- (5) The Company PICS in Part B states:
 - (a) The kind of Data Subjects’ personal data collected or held by the Company,
 - (b) The purposes for which we may use such personal data, and
 - (c) The classes of persons to whom the personal data may be transferred.
- (6) Where the Company collects personal data from a Data Subject under the age of 18, we will request the individual to indicated that he/she has consulted his/her parents or such person(s) having parental responsibility for him/her on the contents of this entire document and understands the matters set out herein before providing his/her personal data to the Company.

3. The Company’s website, online applications and apps

- (1) Information is collected from Data Subjects who visit the Company’s web

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1. For example, emergency contact person and immediate family members of the Data Subjects, speakers, participants in seminars or activities, and visitors.

2. For examples, a Data Subject visits our website (see paragraph 3 below), attends our events, uses our services, applies for a job, registers in our events or communicates with us by various means of communications.

3. These sources may include partner institutions which we collaborate with (for instance, in jointly offered programmes), the Data Subject’s previous employers, academic institutions the Data Subject previously attended or is attending, banks, financial institutions, credit rating agencies, Government, public or non-government bodies, business partners, contractors, service providers, other students or employees, social media platforms and those whom the Data Subject has authorized to provide his/her personal data to other parties.

portal. In addition, information is collected from the use of the Company's smartphone applications by the Data Subjects.

- (2) The Company will normally not use cookies on its website or online applications for storage or tracking of users' information and preferences.
- (3) When "session cookies" are used, a statement will appear to alert users before they initiate or log in to the website or application. The "session cookies" collect technical information⁴. Such information helps us recognise users' identities when they visit multiple pages in a web application within the same login session, thus removing the need to ask the users for the password on each page, and enables certain functions or services to be provided on the website.

Once users log out or close their browser, the cookie expires and no longer has any effect. Most browsers are initially set to accept cookies. Data Subjects may choose to set their browser to decline the cookies or inform them when the cookies are set (although this may prevent access to some portions of the Company's website or application or certain functions or services available on the website or application). Although the Company's web servers, through cookies, can monitor which sites users have visited, which pages they have seen and which options they have chosen, the data gathered through the use of the cookies will not be provided to any third party unless the relevant notice is given and the necessary consent is obtained.

4. The Company's practices

- (1) The Company, as the "Data User" under the PDPO, requires that all staff members who collect or process personal data comply with the relevant law, including the PDPO.
- (2) Unless a Data Subject consents, we will not use his/her personal data for any purpose other than the purpose for which the data was originally collected. We will only use a Data Subject's personal data for direct marketing purposes if he/she has consented to do so in accordance with the Company's PDPO⁵. Any consent for use of personal data in direct

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4. For example, IP address, login information, browser information and information about the users' visits.

5. Please refer to Part B Section II paragraph 2 under "Direct Marketing".

marketing may be withdrawn by the Data Subject at any time.

- (3) If the Company engages outsourcing service providers or data processors (whether within or outside Hong Kong) to assist in its handling of personal data, partners with any parties in activities that involve collection of personal data, or shares the personal data it collects with bodies related to the Company in its various identities, such as an educational and research institution, charitable body, doner, landlord/tenant, general corporate entity, constituent member, sponsor, and participant/partner, all these providers, processors, parties and bodies are required to adhere to specific standards to prevent any loss, unauthorised access, use, modification, disclosure or retention, either by contractual provisions or other means.

5. Accuracy and duration of retention of personal data

We take all reasonably practicable steps to ensure that the personal data collected and retained is accurate. Service users have the obligations to update their personal data with us. Personal data will be retained no longer than is necessary for the fulfilment of the purposes for which it is collected or to which the Data Subject has given consent, except for the purposes of fulfilling legal obligations or with subsisting reasons. In some but limited circumstances, certain data may be retained indefinitely, for example, regarding a Data Subject's participation in some of the Company's events or activities which we sometimes record and preserve as part of the Company's overall historical records and organisational archives. The Company maintains an inventory of the kind of personal data that it collects, holds or processes, designate retention periods.

6. Security of personal data

- (1) The Company takes all reasonably practicable steps and implements internal guidance to ensure that personal data held is protected against unauthorised or accidental access, processing, erasure or other use.
- (2) In order to secure the safe transmission of personal data over the internet, the Company implements appropriate measures (including encryption and two-step authentication mechanisms) where practicable to protect security of data transmitted and against unauthorised access. Our server providers also employ technologies to reduce the risk of cyberattacks over the internet.
- (3) The internet is not a secure form of communication, and a Data Subject who sends any personal data to the Company over the internet accepts the risks that such communication, involves, including the risk of access or

interference by unauthorised third parties. Information passing over the internet may be transmitted internationally (even when the sender and recipient are located in the same country) via countries with weaker privacy and data protection laws than a Data Subject's country of residence.

7. Information to be generally available

We will generally be able to provide upon request the following information in relation to personal data collected and processed by us:

- (1) the kinds of personal data held;
- (2) the main purposes for which personal data is used; and
- (3) our policies and practices in relation to the handling of such personal data.

8. Access to personal data and data correction requests

- (1) Data Subjects have the right to request access to their personal data held by sending an email to info@onlinecompanionhk.com contacting the Company's administrator. We will charge a fee for processing each data access request. Normally, we will inform the Data Subject of the outcome within 20 calendar days of his/her submission of the access request and will give a reason if the request is refused.
- (2) A Data Subject also has the right to request correction of his/her personal data that is inaccurate at no charge by writing to our administrator.
- (3) Data Subjects whose personal data is subject to the requirements of EU-GDPR may exercise their rights under the EU-GDPR by contacting our administrator.

9. Amendments and language

This Privacy Policy Statement and the following PICS are subject to review and change from time to time. Please visit our website for the latest Privacy Policy Statement and PICS. In case of any discrepancy between the English and Chinese versions of the Privacy Policy Statement and the PICS, the English version shall prevail.

10. Enquiries

If there are any queries concerning this Privacy Policy Statement, please contact Company's administrator. All queries shall be in writing and sent to the administrator by email: info@onlinecompanionhk.com.

B. Personal Information Collection Statement (PICS)

(This PICS shall be read in conjunction with the Privacy Policy Statement in Part A above)

I. Introduction

1. From time to time, it is necessary for various individuals (collectively, the “Data Subjects”) to supply the Company (as defined in our Privacy Policy Statement) with data in connection with various activities in which the Company is involved.

2. Failure to supply such data may result in the Company being unable to provide services, support, assistance, etc., to the Data Subjects.

3. Data is collected from Data Subjects in the ordinary course of and the continuation of the Company’s relationship with such Data Subjects, including (without limitation) through their own actions, third parties, the public domain, and the cookies and behavioural tracking tools of the Company’s mobile application and websites, and when Data Subjects interact with the Company in person (e.g. as visitors, guests or users of the Company’s facilities) or through other media (e.g. through the internet or by post).

4. The PICS comprises three sections:
Section I. Introduction
Section II. General Privacy Information
Section III. Supplemental Privacy Information
(Sections II and III together form the “**Privacy Information**”).

It sets out:
 - (1) the kind of personal data collected from you or held by the Company about you as a Data Subject;
 - (2) the purposes for which personal data is collected; and
 - (3) the classes of persons to whom such personal data may be transferred.

5. Section II is the general Privacy Information relevant to all Data Subjects including you.

6. Section III is the supplemental Privacy Information relevant to specific groups of Data Subjects.

Please read **BOTH Section II and the relevant subsection in Section III**

applicable to you before you provide your personal data to us:

Subsection III	Specific Group of Data Subjects
1	job applicants
2	staff members
3.	franchisee therapist
4.	donors

7. When or before collecting your personal data, we will provide you or the party to whom you have authorised to provide your personal data on your behalf, a copy of the Privacy Policy Statement and this PICS in one document, either electronically, by way of a webpage link or in hard copy. *Unless a different PICS is provided to you when you are requested for personal data from you through specific enrollment procedures*, this PICS applies to personal data provided by you from time to time.

8. Through this PICS or our staff member, you will be informed whether it is obligatory or voluntary for you to provide the personal data when we seek to collect the data from you. If provision is obligatory, you will be informed of the consequences for you if you do not supply such data.

9. If you are under the age of 18, you shall consult your parents or such person(s) having parental responsibility for you on the contents of the Privacy Policy Statement in Part A above and this PICS and ensure that you understand their contents before providing your personal data to us.

10. It is sometimes necessary for the Company in certain of its activities (recurring or otherwise) to collect and handle specific types of personal data for enabling and facilitating the activities. The personal information collection statement custom-made for these activities (“Bespoke PICS”) shall be read in conjunction with this PICS and unless any terms in the Bespoke PICS state otherwise (in which case, such terms shall prevail), the contents of this PICS apply to you in full.

11. Nothing in this PICS shall limit the rights of Data Subjects under the Personal Data (Privacy) Ordinance.

II. General Privacy Information

1. Types of personal data

Your personal data collected or held by us includes:

Types		Examples (illustrative only)
1	identification and personal information	<ul style="list-style-type: none"> • name • date of birth • gender • identity card/passport details • photographic images
2	contact details	<ul style="list-style-type: none"> • address • telephone number • email address • emergency contact
3	information collected by means of cookies (when you access our website, online applications or apps)	<ul style="list-style-type: none"> • webpage(s) visited • options chosen • links clicked to access
4	other personal data applicable to you in Section III	
5	additional personal data set out in any Bespoke PICS	

2. Purposes for which your personal data is collected.

The purposes for which data relating to a Data Subject may be used vary depending on the nature of the Data Subject's relationship with the Company. In general, the personal data you provide to us will be used for the following purposes from time to time:

1	our provision of services
2	our administration, management and recordkeeping
3	communication and delivery of information and invitations to you
4	promotion of the Company's academic offerings or institutional events, facilities and services, and related publicity activities
5	implementation of and monitoring compliance with our policies and procedures
6	our management (including use, protection and security) of the Company's properties (including counseling room) and facilities
7	protection of the personal safety and health of the Company community
8	direct marketing to which you have consented
9	provision of referrals, references or recommendations
10	handling your complaints or enquiries
11	other purposes applicable to you stated in Section III
12	all other purposes directly related to any of the above
13	purposes as set out in any Bespoke PICS

Direct marketing⁶

Subject to your consent through an opt-in mechanism, the Company may use your personal data (such as name and contact details) to send communications that may be considered to be direct marketing/promotional material which are relevant to you.

3. Disclosure and transfer of your personal data

In connection with the above purposes, we may disclose or transfer your personal data to the following parties:

1	any party who owes a duty of confidentiality to the Company and is obliged to keep the personal data confidential
2	third parties engaged by us to provide services to us and/or you
3	institutions with which we jointly offer programmes or other collaboration opportunities
4	financial institutions whose services are used by either the Company or you
5	credit rating agencies
6	any parties (e.g. staff members and franchisee therapists) within the Company on a need-to-know basis
7	regulators and authorities, including any adjudicative bodies (e.g. courts)
8	third parties who have the right to access such data
9	our professional advisors, such as lawyers, accountants and auditors
10	other parties applicable to you identified in Section III
11	parties as set out in any Bespoke PICS

4. Access to personal data and data correction requests

You have the right to request access to and to request correction of your personal data. Please refer to paragraph 8 of the Privacy Policy Statement in Part A above on the procedures and the party to whom such a request should be made.

5. Enquiries

If you have any queries concerning this PICS, please contact the Company's administrator through email info@onlinecompanionhk.com.

III. Supplemental Privacy Information

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6. "Direct marketing" is defined as (a) the offering, or advertising of the availability, of goods, facilities or services; or (b) the solicitation of donations or contributions for charitable, cultural, philanthropic, recreational, political or other purposes, through direct marketing means.

1. Job applicants

(1) Additional personal data collected or held by us:

a	proof of address
b	family data
c	educational background
d	professional body associations, qualifications and work experience
e	academic transcripts
f	test results and testimonials
g	academic and job references
h	records of assessment records and review
i	medical or health-related information
j	criminal records check
k	other information provided by you in the job application

Provision of the above personal data is obligatory, unless such items are indicated as optional. If you do not or are unable to provide such data, we may not be able to assess your job application, process your requests or provide you with services generally.

(2) Additional purposes for which your personal data may be used:

a	serve as a basis for assessing your job application
b	obtain references and recommendations relevant to your application
c	manage the application account and process the application
d	verify your identity, public examination results, qualifications and academic records and work experience
e	ascertain any criminal record or adverse finding or ruling against you
f	facilitate communications for application-related matters
g	conduct statistical analysis, research, surveys, quality assurance and review
h	process a work visa application, if applicable

If your application is not successful, your personal data will be retained and thereafter erased in five year.

(3) Additional third parties to whom your personal data may be disclosed or transferred:

a	previous employers, academic institutions and professional bodies
b	service providers engaged by us for conducting background checks and searches
c	Government departments and regulators
d	third-party institutions (whether or not affiliated with us) and their staff

	members, where your application relates to a joint appointment with, or secondment to, such institutions
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2. Staff members

(1) Additional personal data collected or held by us:

a	information provided by you or collected or prepared by us in the job application and onboarding processes, and during the course of employment
b	contractual data
c	records of assessment and review
d	medical or health-related information
e	criminal records check
f	employment details and records
g	test results and testimonials
h	credit rating data and financial (including bank account) information
i	information relating to criminal or civil proceedings involving you as a party/witness
j	Bank account information

Provision of the above personal data is obligatory, unless such items are indicated as optional. If you do not or are unable to provide such data, we may not be able to administer the human resources functions or provide you with employee benefits.

(2) Additional purposes for which your personal data may be used:

a	provide access to and usage of our facilities (whether physical or electronic such as online applications and apps) and properties (e.g. office premises)
b	enable work planning
c	facilitate planning and administration of benefits
d	process remuneration, payroll and other payments due from the Company to you (e.g. reimbursement of company expenses) or vice versa
e	prepare tax returns
f	facilitate performance appraisals
g	review appointments, promotions and granting of awards
h	organise training and development activities
i	conduct investigations and forensic reviews
j	take disciplinary action
k	prepare management reports or employee announcements
l	provide references and certificate of services to potential employers, financial or educational institutions
m	comply with applicable laws, regulations and procedures
n	support other purposes permitted by the terms of employment

In addition to the above, all other general employment-related purposes in manpower planning and management, development and maintenance of employment relationship

are included without limitation.

(3) Additional third parties to whom your personal data may be disclosed or transferred:

a	fund administrators/managers of the Superannuation Fund or Mandatory Provident Fund Scheme
b	insurers and their agents
c	Government departments and regulatory bodies
d	prospective employers (provided that you have consented) for the purpose of providing references
e	certification and accreditation bodies and ranking information providers
f	professional advisors (including lawyers, accountants and auditors)
g	third-party service providers engaged, subscribed or participated with by us for the above-mentioned purposes in Section II and this Section III

Your personal data is retained primarily by the internal human resource administrator.

3. Franchisee Therapist

(1) Additional personal data collected or held by us:

a	educational information
	professional body associations, qualifications, and work experience
b	proof of counseling experience
c	academic transcripts
d	business registration (BR) copy
e	professional indemnity insurance copy
f	proof of cognitive behavior therapy (CBT) experience
g	Bank account information
h	address for providing counseling service

Provision of the above personal data is obligatory, unless such items are indicated as optional. If you do not or are unable to provide such data, we may not be able to assess if you are meeting the criteria for becoming the Company's franchisee therapist, process your franchisee contract with the Company.

(2) Additional purposes for which your personal data may be used:

a	serve as a basis for assessing your eligibility for becoming the Company's franchisee therapist
b	manage the service account and process the franchise agreement
c	verify your identity, qualifications, academic records and work experience
d	facilitate communications for the franchise agreement-related matters
f	ensure the quality service delivery to clients

g	ensure the protection of clients' safety
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If your application for joining the Company as a franchisee therapist is not successful, your personal data will be retained and thereafter erased in five year.

4. Donors

(1) Additional personal data collected or held by the Company:

Personal data provided by you in the donation form and the donation process.

(2) Additional purposes for which your personal data may be used:

a	administer and process your donations (including any pre-acceptance clearance procedures)
b	give due recognition to donations with proper acknowledgement and publicity
c	communicate to you Company news, updates, initiatives, publications and invitations to Company events and activities
d	facilitate data analysis and statistical report compilation

(3) Additional third parties to whom your personal data may be disclosed or transferred:

Notwithstanding Section II (General Privacy Information) in this PICS, your personal data will be treated as strictly confidential and in accordance with our Donor Charter and the law.