



香港賽馬會
公眾騎術學校有限公司
HKJC Public Riding Schools Limited

Privacy Policy Statement

HKJC Public Riding Schools Limited ("the School") is committed to ensuring the privacy and security of the Personal Data (as defined below) it holds. The School aims to meet this commitment by implementing the principles and requirements of the Personal Data (Privacy) Ordinance ("the Ordinance") of the Hong Kong Special Administrative Region of the People's Republic of China ("Hong Kong"). This Privacy Policy Statement is intended to explain the School's privacy practices.

For the purpose of this Privacy Policy Statement, The Hong Kong Jockey Club, its subsidiaries or entities shall together be referred to as "the Club" and each "a Club Entity". You may obtain details of subsidiaries or entities which the Club or the School is related to from the annual report of the Club.

Collection of Personal Data

"Personal Data" refers to any data which may directly or indirectly identify you or other person(s) as an individual, or is capable of doing so. The School collects and uses Personal Data that it believes is necessary to conduct its business with you. The types of Personal Data the School collects may include, but not limited to, the following:

1. Information about you such as your full name, date of birth, gender, height, weight, marital status, educational background, physical condition and riding experience;
2. Photographs and other images of yours and biometric data, such as your voice, voice ID, thumb ID and facial recognition data;
3. Contact details such as your email address, mailing and residential address, telephone/mobile number, fax number and information of an emergency contact person;
4. Unique identifiers or personal identifiers for the programmes managed and/or operated by the School, and for verification of identity, including but not limited to your HKID and passport number, and the relevant login credentials;
5. Your usage, transactional and activity records of the facilities and services provided and/or operated by the School;

6. Payment information such as card holder name, your credit or debit card number and expiry date, information about your bank account or other payment services, billing address and other information;
7. Your interests, preferences and opinions and your responses to market surveys and contests conducted by the School or on its behalf;
8. Details of other transactions or purchase or use of facilities and services with the School or a Club Entity or their respective business partners;
9. Information the School collects about you when you use the School's websites ("Websites"), mobile applications ("Apps"), web pages (including social media pages) ("Web Pages") and systems, e.g. general diagnostic and usage data, geographic location of your device, details about your device, technical information (e.g. IP address, your log-in information, browser type and version, any unique device identifiers etc.), information about your visit (e.g. the full URL, clickstream to, through and from the School's Websites, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs) and browsing history, etc.); and/or
10. Any other Personal Data and/or information provided by you, acquired and/or came into existence during the establishment or maintenance of business relationship for the performance of contracts or for compliance with laws, regulations, regulatory requirements and/or any rules or bye-laws of the School.

Supply of Personal Data to the School is non-obligatory, but failure to do so may result in the School being unable to process your application(s) or to provide facilities and services to you.

Occasionally, you may need to provide Personal Data about other individuals to the School (e.g. spouse, children or guests). In that event, to comply with the Ordinance and any other applicable laws, regulations and requirements, you are required to have first obtained the authorisation of such individuals before using, disclosing and transferring their Personal Data, including giving consent on their behalf to the School's possible use, disclosure and transfer of their Personal Data. You agree to, upon the School's request, provide any supporting documents which may be necessary to prove such authorisation. You also agree to procure and ensure that they have made access to this Privacy Policy Statement and advise them that the School can be contacted for further information.

Use of Personal Data

Your Personal Data may be used for the following purposes, including but not limited to:

1. Carrying out the School's operations and provision of facilities and services;
2. Conducting checks regarding eligibility for using the facilities and services applied for;
3. Verifying your identity;

4. Matching (as defined in the Ordinance) your Personal Data with other data collected (by the School or third parties) for other purposes and automated decision processing (including profiling), in relation to, the provision of facilities and services to you, the performance of any transactions and administration work related to the School's operations and tailoring and personalising facilities, services and offers as set out below;
5. Conducting data analysis (e.g. analysing trends, usages and other user behaviours) and commercial exploration of big data applications;
6. For marketing, promotional and customer management purposes, such as sending you offers and promotions (please see further details in "Direct Marketing" below);
7. Conducting marketing services and events, and tailoring and personalising the School's facilities, services and offers that the School and its business partners provide to you. The School may also tailor its communications to you and tailor what the School presents to you to better match your preferences and interests;
8. For the purposes of improving or designing new facilities and services, including to ensure that the School's Websites, Apps and Web Pages function correctly and in accordance with your preferences and circumstances;
9. Maintaining and developing the School's business systems and infrastructure, including testing and upgrading of these systems;
10. Meeting any obligations, requirements or arrangements, whether compulsory or voluntary, or establishing, exercising or defending any legal rights of the School or the Club, in connection with:
 - a. any law, regulation, judgment, court order, sanctions regime, within or outside Hong Kong existing currently and in the future;
 - b. any guidelines, guidance, demand or requests given or issued by any legal, regulatory, governmental, tax, law enforcement or other authorities within or outside Hong Kong;
 - c. any of the School or the Club's rules or bye-laws relating to the School or the Club's core operations; or
 - d. any other agreements between you and the School or the Club.
11. Complying with any obligations, requirements, policies, procedures, measures or arrangements for sharing data and information of the School and/or any other use of data and information in accordance with any programmes for compliance with client due diligence, sanctions or prevention or detection of money laundering, terrorist financing or other unlawful activities;
12. Prevention, detection or investigation of anomalies and preventing and/or remediating fraud or other potentially criminal, prohibited or illegal activities or otherwise protecting the integrity of the School, the Club and any Club Entity;

13. Facilitating communications between you and the School;
14. Responding or taking part in legal proceedings, including seeking professional advice; and/or
15. All other legitimate business purposes and purposes directly related to or incidental to the above.

The School may also use from time to time aggregate non-identifying information about its customers to better design and improve its facilities and services that it offers. This information will not identify any individual in particular.

Direct Marketing

Subject to the School having obtained the relevant consent from you, the School may use your Personal Data for direct marketing carried out by the School, the Club or a Club Entity for marketing and promotion of the following classes of facilities, services, support, and related events and activities offered or arranged by the School, the Club or a Club Entity or their respective business partners:

1. The School's or equestrian related facilities, services, and training, instruction or competitions;
2. Horse riding related apparel, equipment or accessories; and/or
3. Charitable or non-profit making causes including art, communities services, conservation, culture, education, environmental protection, healthcare, music, recreation, and sports.

For such purposes, your Personal Data held by the School or a Club Entity may be provided to other Club Entities and/or their respective business partners for use for direct marketing subject to your consent. The School or a Club Entity or their respective business partners may also conduct such direct marketing via or jointly with third party services providers including social media platforms, which may involve sharing your Personal Data the School or a Club Entity or their respective business partners hold about you with them.

You can always opt-out free-of-charge by following the opt-out instructions contained in the relevant communications or contacting The Hong Kong Jockey Club's Data Privacy Compliance Officer if you no longer wish any of your personal data to be used in and/or be transferred for any of the described direct marketing purposes.

Please note that if you choose to opt-out of direct marketing, the School may still send you communications which are of administrative nature.

The School may create indirect group profiling by way of analysing your preference characteristics manifested in the information the School has about you (e.g. your preferences).

Disclosure of Personal Data

Personal Data supplied to the School will be kept confidential. However, the School may disclose such data to or such data may become accessible or known to the following parties:

1. Employees, agents, contractors, third party service providers and consultants of the School who provide services to assist in fulfilling the purposes for which it was collected (subject to any consent requirement relating to “Direct Marketing” above);
2. Any Club Entity for fulfilling the purposes for which it was collected (subject to any consent requirement relating to “Direct Marketing” above);
3. Any other person or company who is under a duty of confidentiality to the School and has undertaken to keep such information confidential, provided such person or company has a legitimate right to such information;
4. The School’s insurers and their reinsurers, brokers and agents;
5. Government and regulatory authorities, investigative bodies, courts, law enforcement agencies and other organisations, as required or authorised by law, orders or requests;
6. Any financial institutions or payment services providers necessary to establish and support the payment of any facilities and services provided to you;
7. Your authorised representatives or your legal advisers when requested by you to do so; and/or
8. Other disclosure of your Personal Data will only be undertaken after the School has obtained your prescribed consent, or as may be required by law.

The School may also disclose your Personal Data to third parties: (i) when required by law, by court order or in response to a search warrant or other legally valid inquiry; (ii) pursuant to the School's good faith belief that disclosure is required by law or otherwise necessary to the establishment of legal claims or defences, to obtain legal advice, to exercise and defend the School's legal rights or to protect the life, body or property of any individual; or (iii) for enforcement of the School's rules or bye-laws or prevent unauthorised access to School premises. This also applies when the School has reason to believe that disclosing the Personal Data is necessary to identify, contact or bring legal action against someone who may be causing interference with the School's rights or properties, whether intentionally or otherwise, or when anyone else could be harmed by activities causing such interference.

The School may also transfer any information it holds about you as an asset in connection with a merger or sale (including transfers made as part of insolvency or bankruptcy proceedings) involving all or part of the School or as part of a corporate reorganisation or other change in corporate control.

The Personal Data that the School collects or obtains may be transferred to jurisdictions that offer lesser protection of personal data than that provided in your jurisdiction. By submitting Personal Data to the School or using any of the School's facilities and services, you understand and consent to such transfer.

Links to Third Party Websites

The School's Websites, Apps and Web Pages may contain links to other sites and pages which are operated by third parties. You understand and acknowledge that the School has no control over and does not endorse the content of the linked websites or the way in which the operators of those websites deal with your Personal Data. You should review the privacy policy for those third party websites to understand the ways in which your Personal Data may be used by those third parties.

Use of Cookies

By using any of the Websites, Apps and/or Web Pages, you agree that the School can store and access cookies, IP addresses, domain names, URLs and use other methods in order to collect your usage data on the Websites, Apps and/or Web Pages and improve your on-line experience.

Cookies are small files that are placed on your computer, mobile phones and other devices by websites or mobile applications that you visit/use or certain emails you open. They are widely used in order to make functions on the websites, mobile applications and/or emails properly, as well as to provide business and marketing information to the owners of the websites, mobile applications and/or emails.

The School uses cookies on its Websites, Apps and/or Web Pages to track visitor preferences. These cookies allow the Websites, Apps and/or Web Pages to remember information that changes the way the Websites, Apps and/or Web Pages behave or look, such as your preferred language. These cookies can also assist you in changing text size, font and other parts of the Websites, Apps and/or Web Pages that you can personalise. You may refuse to accept cookies by altering the settings on your internet browser, mobile phone or device but it should be noted that if you choose not to permit cookies, some areas of the Websites, Apps and/or Web Pages may not function properly.

Data Retention

All Personal Data that has been collected from you will only be stored for a duration that is reasonably necessary to fulfil the purposes for which it was collected as outlined under this Privacy Policy Statement. In some circumstances, the School may retain your Personal Data for longer periods of time, for instance, where the School is required to do so to meet legal, statutory, regulatory, tax or accounting requirements.

Commitment to Data Security

The School is committed to protecting the security of your Personal Data. It uses a variety of physical, technological and organisational measures to help protect your Personal Data from unauthorised or accidental access, processing, erasure or other use.

The transmission of information via the Internet or mobile network is not completely secure. The security measures described above do not preclude the School from the possibility of fraud, cyber-attacks, such as hacking, spyware and viruses, and the School does not warrant that its servers or network will be immune from such attacks.

Although the School will implement security measures to protect your data, the School cannot guarantee the security of the data transmitted via Internet or mobile network. You agree that the School shall not be liable for any loss or damage arising from risks relating to any transmission.

Changes to this Privacy Policy Statement

The School may update this Privacy Policy Statement from time to time which will be posted on its Website at www.hkjcridingschools.com so as to inform you what information the School gathers, how it might use that information and whether it discloses such information to anyone. You are also advised to check the latest Privacy Policy Statement posted on the School's Website at www.hkjcridingschools.com on a regular basis. Where there are significant changes, the School will notify you and obtain your acceptance and/or consents (as necessary or applicable). If you do not agree with this Privacy Policy Statement (as revised), please do not use or cease to use the facilities or services of the School and do not give the School any of your information. By continuing to use the facilities or services of the School after the changes come into effect, you agree to the revised Privacy Policy Statement.

Access to and Correction of Personal Data

You are entitled to request access to Personal Data held by the School about you and to correct such data. In accordance with the terms of the Ordinance, the School may charge a reasonable fee for the processing of such data access requests.

You may direct your request in writing to:

Data Privacy Compliance Officer of The Hong Kong Jockey Club
Jockey Club Headquarters
1 Sports Road
Happy Valley, Hong Kong

Interpretation

This notice is written in English language and may be translated into Chinese and other languages. In the event of any inconsistency between the English version and the translated version of this notice, the English version shall prevail.