

私隱政策聲明

聲澮非常重視個人私隱，並確保轄下之服務於任何情況下收集、使用、儲存、轉移及查閱個人資料之程序均符合香港的《個人資料(私隱)條例》的要求。本聲明旨在說明聲澮收集個人資料的政策及原則。

收集資料

閣下在使用聲澮及有關單位之服務、為聲澮提供服務、受僱於聲澮、作出投訴及／或瀏覽聲澮各個網頁時，聲澮將可能向閣下收集個人資料，包括但不限於以下資料：

活動參加者／服務使用者：姓名、電話號碼、手提電話號碼、地址、電郵地址、出生日期、身份證號碼、監護人資料、就讀學校等。僱員／兼職導師／任何直接或間接受僱於聲澮之人士：記錄在職位申請表上之各項個人資料、薪金資料、銀行戶口號碼、支薪紀錄、公積金／強積金供款、請假紀錄、培訓紀錄、醫療及申請津貼紀錄、工作表現評估及紀律等。服務提供者：姓名、身份證號碼、電話號碼、地址、銀行戶口號碼等。投訴人：投訴人姓名、電話、電郵、投訴內容、調查過程及結果等。閣下有責任提供申請表格上的資料，或啟動相關流程必須提供的資料，否則聲澮有可能無法提供閣下要求之服務。

使用資料

活動參加者／服務使用者：有關資料用作參與活動的相關用途、簽發收據、收集意見、資料分析，及其他配合本會宗旨及使命的事項。僱員／兼職導師／任何直接或間接受僱於聲澮之人士：有關資料將用作招聘及人力資源管理用途，例如聘任、支薪、工作調配、工作表現評估、紀律等事宜。服務提供者：有關資料將用作發放合約酬金等事宜。投訴人：有關資料將用作調查、回應及跟進相關投訴工作。所有聲澮及有關單位的服務資訊的傳遞將按《個人資料(私隱)條例》之要求，於取得資料當事人的同意才進行。資料當事人如需取消接收聲澮及有關單位的資訊，請電郵至 syngclub@gmail.com 與聲澮職員聯絡。

外判安排

聲澮有部分服務由第三方服務供應商開發及／或提供，這些服務包括但不限於：開發及維修系統、提供班組活動等。聲澮所有服務供應商均受合約約束，必須將所有個人資料保密，聲澮亦承諾採取一切可行的措施保障閣下的個人資料。

將個人資料轉移至香港以外地方

聲澮會在必要時，將個人資料轉移至香港以外的地方，以達到收集個人資料之目的或與其有關之目的。

保留資料

聲澮只在有必要達到收集閣下個人資料所訂明的用途期間內，保留閣下的個人資料。如聲澮持有的個人資料無需再用於收集資料時所列出的目的，將在合理時間內銷毀有關資料。

披露個人資料

聲澮不會租用、出售、轉移或披露聲澮所持有之個人資料予他人或非聲澮有關單位，除非：

- i. 對方為於業務上向聲澮提供行政、電訊、電腦或其他任何服務的人士、代理機構、承辦商或服務提供者；
- ii. 閣下要求之服務由有關人士／公司負責提供；
- iii. 已預先得到資料當事人的同意；
- iv. 對非法活動、懷疑詐騙、涉及或威脅到任何人的人身安全的事件作出調查、預防及採取行動；
- v. 遵循所有適用法律、規定、法律程序、具法律效力的政府要求、行政制度或規例要求。

瀏覽聲澮網頁及使用聲澮手機程式時被收集的資料

一般使用者到訪聲澮網頁或使用聲澮手機程式時，為令使用更暢順及更方便，有一些基本資料會被自動存取，例如 IP 地址及／或域名、瀏覽器類別及設定、語言設定、地區、操作系統、及瀏覽時間或其他有關資料，以上資料均為不記名，在一般情況下並不能辨識瀏覽者的身份。當需要可辨識個人身份的資料時，網站及手機應用程式將會有明確的提示及讓使用者同意方會進行。

閉路電視監察系統

為保障聲澮各單位的職員、到訪者及財產的安全，聲澮在部份單位及辦公室的公眾範圍安裝閉路電視，閣下在單位的合理範圍內，可能受視像監察。一般而言，錄像保存期不超過六個月，有關錄像只供授權人士用於上述註明之用途。

保障措施

聲澮採取適當措施以保障聲澮持有的個人資料，免受遺失、未經許可的收集、使用、修改、轉移、查閱及披露。

聲澮各網頁的登記用戶有責任確保帳號及密碼的機密及安全。用戶需對利用有關帳號及密碼所進行的一切行動，負完全的責任。

查閱及改正資料

閣下有責任向聲澮更新資料，否則聲澮有可能無法提供閣下要求之服務。

根據《個人資料(私隱)條例》，資料當事人有權要求查閱和改正所提供的個人資料及索取有關資料的複本。聲澮在處理查閱或改正資料要求時，會查核提出要求者的身份，以確保他／她在法律上有權作出這項要求。聲澮須在或可在條例第 20 條指明的情況下拒絕依從查閱資料要求，例如申請人未能提供聲澮合理要求的資訊。

閣下如需查詢或改正其個人資料，可填妥個人資料私隱專員公署的查閱資料要求表格 (OPS003)

(<https://www.pcpd.org.hk/chinese/publications/files/Dformc.pdf>)，或以書面形式申請，並電郵

至 syngclub@gmail.com。在收到閣下提出的要求後，聲澮將在 40 天內給予回覆，聲澮將可能就收取合理的費用。

修訂

聲澮保留權利對本聲明作出修訂，有關修訂將於聲澮網站公佈。本聲明的最近更新日期為 2024 年 4 月。

倘本聲明的中文版本及英文版本有歧義或抵觸之處，概以英文版本為準。

Privacy Policy Statement

Syng Club respects the privacy of individuals. We do our best to ensure the collection, usage, storage, transfer and disclosure of your personal data accord to the Personal Data (Privacy) Ordinance. This Statement explains our policies and practices on handling personal data.

Data collection

When you are using the service of Syng Club or its service units, providing services to Syng Club, being employed by Syng Club, making a complaint and/or browsing the websites of Syng Club, your personal data may be collected, including but not limited to:

Participants / service users: Name, telephone number, mobile phone number, address, email address, date of birth, HKID number, guardian information, school, etc. Employees / part-time instructors / any person directly or indirectly employed by Syng Club: the personal data provided in the job application forms, information on salary/wage, bank account number, payment records, contributions to provident fund or mandatory provident fund, leave records, training records, records on medical and claiming subsidies, performance appraisal and disciplinary action, etc. Service providers: Name, HKID number, telephone number, address, bank account number, etc. Complainants: the name of complainant, telephone number, email address, the content of the complaint, investigation process and result etc. You are obliged to provide the mandatory information as listed on the forms or other necessary information for initiating the process. Otherwise, Syng Club may not be able to provide the service you request.

Data usage

Participants / service users: the data collected may be used for the purposes related to the participation in different programmes and activities, the issuance of receipts, collecting user feedback, conducting analyses, and any other initiatives in relation to the aims and objectives of Syng Club. Employees / part-time instructors / any person directly or indirectly employed by Syng Club: the data collected may be used for recruitment and human resources management, such as appointment, salary/wage payment, internal transfer, performance appraisal and disciplinary action. Service providers: the data collected may be used for payment or relevant issues. Complainants: the data collected will be used for the investigation, reply and follow-up to the complaint. The dissemination of news and information related to Syng Club and its service units would be conducted in accordance with the requirements of the Personal Data (Privacy) Ordinance, after obtaining the consent from the data subject. Should you wish to stop receiving news and information from Syng Club and its service units, please contact us at syngclub@gmail.com.

Outsourcing arrangements

Some of the services of Syng Club, including but not limited to the development and maintenance of systems, running of classes and courses, are provided, developed and/or maintained by third-party service providers. All providers are bound by contractual duty to keep all the personal data confidential; we also promise to take all practicable measures to protect your personal data.

Transfer of personal data to places outside Hong Kong

If deemed necessary, Syng Club may transfer your personal data to places outside Hong Kong, in order to carry out the purposes stated during data collection, or related purposes.

Data retention

Syng Club will only retain your personal data within the period that retention is necessary for the fulfillment of the purposes stated during collection. Shall the personal data we keep be no longer required for the stated purposes, they will be erased within a reasonable timeframe.

Disclosure of personal data

Syng Club does not rent, sell, transfer or disclose your personal information with other people or non-affiliated companies except under the following circumstances:

- i. any agent, contractor or third party service provider who provides administrative, telecommunications, computer, or any other services to Syng Club in connection with the operation of its business;
- ii. the services requested by you is provided by the person or company concerned;
- iii. with your prior consent;
- iv. we believe that it is necessary to share information in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, or situations involving potential threats to the physical safety of any person;
- v. to satisfy any applicable law, regulation, legal process, enforceable governmental request and administrative requirements.

Information collected when you visit Syng Club's websites and using Syng Club's mobile apps

Internet technology requires some basic information in order for users of websites or mobile apps to use our online services smoothly. The basic information should include but not limited to IP addresses and/or domain names, browser type and settings, language settings, geographical district, operating system, and time/duration of visit. These data are anonymous and cannot be used to identify the user under general situations. When personal identifiable information of users are involved or collected in Syng Club's websites or mobile apps, users will be prompted to give explicit alert of the collection so as to give consent.

CCTV Monitoring System

To safeguard the security and properties of Syng Club, its staff and visitors, Syng Club has installed CCTV monitoring systems in the public areas in some offices and premises. You may be recorded in reasonable ranges of the premises. Generally speaking, video records will be kept for not more than 6 months. Only authorized personnel can access the video records for the purpose stated above.

Protection measures

Syng Club takes appropriate measures to protect the personal data we hold from loss, unauthorized collection, use, modification, transfer, access or disclosure.

A registered user of Syng Club's websites should keep his/her login name and password safe and secure; and has sole responsibility over the action conducted under his/her own login name and password.

Data access and correction

You should update your personal information with us shall there be any change; otherwise Syng Club may not be able to provide the services you request.

According to the Personal Data (Privacy) Ordinance, you have the right to access and correct your personal data and request a copy of the said data. When such requests are made, Syng Club will check the requestor's identity to ensure the requestor is legally entitled to make the data access or correction request. Syng Club shall or may refuse to comply with a data access request in the circumstances specified in section 20 of the Ordinance, for example, the requestor fails to provide necessary information to Syng Club.

You can make your request by completing the Data Access Request Form (OPS003) available from the Office of the Privacy Commissioner for Personal Data (<https://www.pcpd.org.hk/english/publications/files/Dforme.pdf>) and/or submitting the request in writing; and sending the details to syngclub@gmail.com. Your request will be answered in 40 days. A fee may be charged for complying a data access request.

Revision of this Statement

Syng Club reserves the right to revise this Statement. Revision will be announced on Syng Club's website. This Statement was last updated in April 2024.

In case of any discrepancy between the English and Chinese versions of this Statement, the English version shall prevail.