

Notice to Customers relating to the Personal Data Ordinance

Travelux Limited ("Travelux") Notice to Customers relating to the Personal Data (Privacy) Ordinance (the "Ordinance")

- (a) From time to time, it is necessary for customers to supply Travelux with data in connection with
 - (i) the opening or continuation of accounts, and
 - (ii) the provision of travel related products and services ("Services") by Travelux.
- (b) Data may also be collected from customers or generated about them in the ordinary course of the continuation and operation of the account relationship and the provision of other Services.
- (c) Data collected from customers may be used for obligatory purpose and/or voluntary purposes:-
 - (i) If personal data are to be used for an obligatory purpose, the customer must provide his personal data to Travelux if he wants Travelux to provide the Services. Failure to supply such data for obligatory purposes may result in Travelux being unable to open or continue account relationships or to provide Services.
 - (ii) If personal data are only to be used for a voluntary purpose, the customer can tell Travelux not to use his personal data for that purpose and Travelux will stop using that personal data for voluntary purpose.

Obligatory Purposes

- (d) The obligatory purposes for which data relating to a customer may be used are as follows:-
 - (i) daily operation of the Services;
 - (ii) designing products for customers' use;
 - (iii) determining amounts owed to or by customers;
 - (iv) collection of amounts outstanding from customers and those providing security for customers' obligations;
 - (v) complying with obligations, requirements, recommendations and instructions to make disclosure under (1) any law binding on Travelux; and (2) any guidelines, regulations or other measures issued by regulatory or other authorities (including industry and self-regulatory bodies) with which Travelux is obliged or expected to comply;
 - (vi) enabling an actual or proposed assignee of Travelux, or participant of Travelux's rights in respect of the customer to evaluate the transaction intended to be the subject of the assignment, participation; and
 - (vii) purposes directly relating to any of the above purposes.

Voluntary Purposes

(e) USE OF DATA IN DIRECT MARKETING

Travelux intends to use customers' data for direct marketing and Travelux must obtain the consent of its customer (which can include an indication of no objection) for that purpose. In this connection:

(i) the name, telephone number, email address, mailing address, demographic data, products and services portfolio information and transaction pattern and behavior of the customer may be used by Travelux for direct marketing;

(ii) the following classes of products, services and subjects may be marketed:

(a) travel related products and services;

(b) reward, referral, loyalty or privilege programs and related products and services; and

(c) promotional offers, products and services offered by Travelux and Travelux's business partners (including airlines, hotels, restaurants, theme parks, cruise operators, tour operators, transport companies (such as car and transfer service companies and train service operators), fast track service providers, third party insurance companies and reward, loyalty, privilege program providers); and

(iii) the above products, services and subjects may be provided by Travelux, and/or its Partners.

(f) Travelux may also from time to time engage third parties to provide marketing services on its behalf, and may share the data described in paragraph (e)(i) above with these third parties for such purposes.

(g) Travelux may carry out "matching procedures" (as such expression is defined in the Ordinance) in Hong Kong or overseas for the marketing purposes described in paragraphs (e) and (f) above.

If a customer does not wish Travelux to use or provide to other persons his data for use for direct marketing as described above, the customer may exercise his opt-out right by notifying Travelux.

(i) Data held by Travelux relating to a customer will be kept confidential but Travelux may provide such information to (1) all the following parties - for the purposes set out in paragraph (d) above and (2) if the customer agrees, the parties specified in paragraph (vi) below - for the purposes set out in paragraph (e) above: -

(i) any agent, contractor or third party service provider who provides administrative, telecommunications, computer, payment clearing or other services to Travelux in connection with the operation of its business;

(ii) any other person under a duty of confidentiality to Travelux, which has undertaken to keep such information confidential;

(iii) any person to whom there is an obligation, requirement, recommendation or instruction to make disclosure under (1) any law binding on Travelux, (2) any guidelines, regulations or other measures issued by regulatory or other authorities (including industry and self-regulatory bodies) with which Travelux, is obliged or expected to comply;

- (iv) any actual or proposed assignee of Travelux or participant of Travelux's rights in respect of the customer;
 - (v) provided the customer has agreed to the use of his personal data for direct marketing, to Travelux (and also including third parties engaged by Travelux to provide marketing services on their behalf), for marketing purposes (including informing customers of services which Travelux believes will be of interest to customers); and
 - (vi) to any other parties whom the customer has expressly or impliedly authorized Travelux to make such disclosures as may be reasonably necessary or expedient to procure or fulfill the customers' request(s) for Services.
- (k) Under and in accordance with the terms of the Ordinance, any customer has the right
- (i) to check whether Travelux holds data about him and of access to such data;
 - (ii) to require Travelux to correct any data relating to him which are inaccurate; and
 - (iii) to ascertain Travelux's policies and practices in relation to data and to be informed of the kind of personal data held by Travelux.
- (l) In accordance with the terms of the Ordinance, Travelux has the right to charge a reasonable fee for the processing of any data access request.
- (m) The person to whom opt-out requests or consents in relation to the use of personal data for direct marketing, requests for access to data or correction of data and for information regarding policies and practices and kinds of data held are to be addressed is as follows: -

The Data Protection Officer
Travelux Limited
9/F So Hong Commercial Building, 41-47 Jervois Street,
Sheung Wang, Hong Kong
info@travelux.hk

- (n) Nothing in this Notice shall limit the rights of customers under the Personal Data (Privacy) Ordinance.

(For use by customer – Please complete this form in English and block letters.)

OPT-OUT FORM

To: Travelux Limited. (“Travelux”)

I do not wish to receive any marketing communications from Travelux in future, and I do not consent to Travelux providing my personal data to third parties for direct marketing purposes. I agree that this instruction overrides all my previous instructions to Travelux on marketing in respect of all my existing relationships with Travelux (if any).

My full name:

Email:

Date:

(Note: Please provide the above information to enable Travelux to verify your identity and process your request. In order to make this opt-out request effective, Travelux will need to share this opt-out request with third-party business partners. By submitting this opt-out request to Travelux, you shall be deemed to have consented to Travelux sharing this opt-out request with such parties. Please allow some time for this opt-out request to become effective.)