

THE HONG KONG AND CHINA GAS COMPANY LIMITED

APPENDIX 17: PERSONAL DATA PRIVACY POLICY

Our Purpose

This policy sets out the obligations and policies of The Hong Kong and China Gas Company Limited (the "Company") under the main provisions of the Personal Data (Privacy) Ordinance. All our subsidiaries, project companies, associates, suppliers and business partners are encouraged to make reference to the principles of this policy, where applicable.

Our Commitment

The Company is committed to protecting the privacy of personal data and conducting regular audits to ensure compliance with this policy. The Company's Data Privacy Standing Committee reviews strategies for handling personal data and, together with the Data Protection Officer and the Departmental Data Protection Coordinators, deals with personal data related issues.

Communications and awareness training are provided to employees to keep them up to date on personal data protection matters.

Employment Data

For employment purposes, the Company collects personal data of employees and their dependents for administration and communication, assessment of qualifications and experience, and provision of remuneration and benefits, by lawful and fair means.

- **Transfer of Personal Data:** Personal data is treated in strict confidence. Transfer and sharing of such data among the Company, its affiliated companies, and disclosure to Company's service providers and other third parties who have a duty of confidentiality to the Company, (including but not limited to, auditors, Government authorities, medical practitioners, trustees, insurance companies, actuaries and any consultants/agents appointed by the Company to provide and administer employee benefits), will be handled in accordance with the Personal Data (Privacy) Ordinance.
- **Access and Correction of Personal Data:** The Personal Data (Privacy) Ordinance provides employees with the rights to ascertain whether the Company holds personal data about them, to obtain a copy of that data and to amend any incorrect data when necessary. Request for access and correction should be made in writing and addressed to the Corporate Human Resources Department. An administrative fee may be charged in accordance with access requests.
- **Retention of Personal Data:** All practical steps will be taken by the Company to ensure that personal data is only kept for a defined period which is necessary for the purposes of which the data are to be used.

Customer Data

The Company keeps personal details of its customers on file such as names, addresses, ID numbers, telephone numbers, account numbers and information relating to gas consumption and billing, together with other information which may be necessary for the provision of the Company's services.

Customers are required to supply the Company with this kind of data in connection with the opening or operation of gas accounts, and when the Company provides other related facilities and services.

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- **Purpose:** The purposes for which data may be used include:
 - (i) The daily operation of the Company's services and processing applications or requests relating to the Company's products, facilities and services;
 - (ii) Opening and maintaining gas accounts for customers;
 - (iii) Providing after-sales and maintenance services;
 - (iv) Conducting customer, product, facility and service surveys;
 - (v) Direct marketing of products, facilities and services and appeals for donation (please see further details in the section entitled "Use of Your Personal Data in Direct Marketing" below);
 - (vi) Handling customer complaints and enquiries;
 - (vii) Calculating any amount of indebtedness owing to or from customers, and collecting debts from customers;
 - (viii) Making disclosure according to the requirements of any law, regulations, codes of conduct or guidelines applicable to any member of the Group (defined below); and
 - (ix) Any other directly related matters.

Without such data, the Company may not be able to provide services to its customers.

- **Transfer of Personal Data:** Personal data of customers held by the Company will be kept confidential but the Company may provide such information to the following persons (whether within or outside Hong Kong) except that the Company has no current intention to transfer customer data to another person for it to use in direct marketing:
 - (i) Subsidiaries and associated companies of the Company (the Company and all its subsidiaries and associated companies collectively called the "Group");
 - (ii) Any agent, contractor or third party service provider who provides services to the Group in connection with the operation of the Company's business;
 - (iii) The media (only in relation to the handling of customer complaints and enquiries referred to the Company by the media);
 - (iv) Any person to whom any Group member is under an obligation or is otherwise expected to make disclosure according to any law, regulations, codes of conduct or guidelines applicable to any Group member;
 - (v) Any person who owes a duty of confidentiality to any Group member (e.g. professional advisers of the Group).
- **Use of Your Personal Data in Direct Marketing:** The Company is allowed to use customers' personal data in direct marketing only if they consent or do not object. In connection with direct marketing, the Company intends:
 - (i) to use customers' names, contact details, customer profiling and service portfolio information (including information on gas consumptions and billings) held by the Company from time to time in direct marketing
 - (ii) to market the following classes of products, facilities, services and subjects which may be offered or arranged by any member of the Group or business partners with which any member of the Group conducts cross or joint marketing activities:
 - a. Gas supply and related products, facilities and services (including after-sales and maintenance services);
 - b. Household gadgets, cookware, kitchenware, appliances and furnishings
 - c. Restaurants, food and beverages;
 - d. Personal or household insurance products and services;

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- e. Contests, lucky draws, events and/or activities organised or sponsored by any member of the Group (including cooking classes, beverage making classes, workshops on handmade products, certificate courses, product demonstrations and members' activities relating to membership programmes offered by any member of the Group;
 - f. Environmentally friendly and health products;
 - g. Lifestyle products; and
 - h. Donations and contributions for charitable and/or non-profit making purposes.
- **If customers do NOT wish the Company to use their personal data in direct marketing, they may exercise their opt-out right:** They may opt out at the time they registered for the Company's services. They may also write to the Company's Data Protection Officer at the address below or send to webmaster@towngas.com or call the Company at 2880 6988 stating their gas account numbers and other necessary particulars to opt out from direct marketing at any time. The Company will then cease to use their personal data in direct marketing. Processing of such request is free of charge.
 - **Access to and Correction of Personal Data:** Customers have the right under the Ordinance:
 - To check whether the Company holds records of their personal data
 - To obtain a copy of that data
 - To correct any data which is inaccurate

Requests for access to data or correction of data should be made in writing to:
Data Protection Officer
The Hong Kong and China Gas Company Limited
13/F, 363 Java Road, North Point, Hong Kong

Customers may be asked to pay a reasonable handling charge to cover data access processing.

- **Retention of Personal Data:** The Company keeps personal data for such period that is necessary for the fulfillment of the purposes for which the data was collected or as required or permitted by applicable laws.
- **Security:** The Company takes all reasonably practical measures to protect personal data, whether stored physically or electronically, and prevent unauthorized or accidental access, processing, erasure, loss or use (including transfer). Personal data is stored under lock, encrypted or password-protected as necessary. When the Company engages a data processor to process personal data on its behalf, contractual or other means are adopted to prevent unauthorized or accidental access, processing, erasure, loss or use (including transfer) of the data transferred to the data processor.