

APPENDIX 17: PERSONAL DATA PRIVACY POLICY

Our Commitment

This privacy policy sets out the policies and practices of The Hong Kong and China Gas Company Limited and its subsidiaries (collectively, the “Group”) in respect of the collection, use, sharing and protection of personal data in accordance with the relevant provisions of the Personal Data (Privacy) Ordinance (the “Ordinance”). All our associated companies, project companies, suppliers and business partners are encouraged to make reference to the principles of this policy, where applicable.

The Group is committed to protecting the privacy of collected personal data. The Group’s Data Privacy Standing Committee reviews strategies for handling personal data and, together with the Data Protection Officer and the Departmental Data Protection Coordinators, handle personal data related issues in accordance with the requirements under the Ordinance as well as the relevant code of practice and guidance issued by the Office of the Privacy Commissioner for Personal Data, Hong Kong.

The Group does not tolerate disclosing personal data to any parties without the Group’s prior consent. Employees violating this policy will be held responsible for all legal consequences and subject to disciplinary action. Communications and awareness training are provided to employees to keep them up to date on personal data protection matters.

Types of Personal Data Collected and Held

The following categories of personal data are collected and held by the Group:-

1. Personnel records, which include job applicants’ and employees’ personal details, contact details, job particulars, salary, qualifications and experience, training records, attendance, performance appraisals, and disciplinary matters etc.
2. Customer records, which include customers’ personal details and records, contact particulars, payment information, gas consumption data, enquires, and complaint records, etc.
3. Contractor and supplier records, which include personal details, contact particulars, qualifications and experiences, and works records etc. of contractors, consultants, suppliers, service providers and their respective employees.
4. Other records, which include personal details, contact particulars, and visiting records etc. of visitors, shareholders, website users, APPs users, attendees of the Group’s events and members of the public.

Purposes of Collection and Use

1. Personnel records are collected and used for human resource management and administrative

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purposes such as recruitment, communication, assessment of qualifications and experience, and provision of remuneration and benefits.

2. Customer records are collected and used for business and operation in relating to the Group's services, such as processing applications relating to the Group's products, facilities, services, conducting surveys, direct marketing, complaints handling, and enquiries handling.
3. Contractor and supplier records are collected and used for engagement, communication, administration, assessment, monitoring and other purposes relating to the Group's contractors and suppliers.
4. Other records are collected and used for various purposes according to the nature of the record, such as corporate communications, payments, promotions, sponsorship, training, acquisition of services, subscription of publications, survey and marketing, administration of office functions, and policy and operational matters.

Disclosure and Transfer

Personal data collected and held by the Group confidentially. The Group may disclose or transfer such data: -

1. When authorised or required by law, regulations, and rules, including without limitation to law enforcement purposes.
2. To related companies, subsidiaries and associated companies, business partners, agents, contractors, associates, and service providers, and third parties in accordance with the Ordinance.
3. To any other persons or organisations who assist in the Group's operations, such persons or organisations shall be under a duty of confidentiality to the Group to keep such data confidential.

Retention of Personal Data

The Group keeps personal data for as long as necessary to fulfil the purposes outlined in this policy or as required or permitted by applicable laws.

Access and Correction of Personal Data

The Ordinance provides individuals with the rights to ascertain whether the Group holds personal data about them, to obtain a copy of that data and to amend any incorrect data when necessary.

Individuals may request access to personal data by submitting a <Data Access Request Form> (downloadable at <https://www.pcpd.org.hk/english/publications/files/Dforme.pdf>) with identity proof to the Group's Data Protection Officer by post to The Hong Kong and China Gas Company Limited, 25/F, 363 Java Road, North Point, Hong Kong or by email at data.privacy@towngas.com.

A reasonable handling fee may be charged to cover data access processing.

Security

The Group 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). When the Group 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. Where cross-border data transfer is concerned, any processing and transfer of personal data to data user or data processor are protected under contractual clauses consistent with the latest guidance as issued by the Office of the Privacy Commission for Personal Data, Hong Kong and the Ordinance.

Use of cookies

Cookies (text files placed in computers' internet browsers) may be used to store and track information pertaining to the browsing or use of the Group's websites and APPs. The Group may also use related tracking technologies to collect website and APP usage information, which include without limitation to information of pertaining to users' computers, mobile devices, browser details, IP addresses, and their preferences and habits on language, page layout and other matters. Such information collected do not contain personally identifiable information. The Group collects, analyses and uses such information to maintain, manage and enhance user experience. The Group may also share such information with third party research agencies for research and analysis to enhance services and user experience. No personally identifiable information about users will be shared with these third-party research agencies.

Direct Marketing

Customers who do not wish the Group to use their personal data in direct marketing may exercise their opt-out right. Customers may opt out at the time of registration for the Group's services. Customers may also opt-out of direct marketing submitting request to the Group's Data Protection Officer by post to The Hong Kong and China Gas Company Limited, 25/F, 363 Java Road, North Point, Hong Kong, by email at webmaster@towngas.com, or by telephone at 2880 6988 stating their account numbers and other necessary particulars. Processing of such request is free of charge.

Enquiries

Enquiries regarding the Group's personal data privacy policy and related practices may be submitted by post to the Group's Data Protection Officer, The Hong Kong and China Gas Company Limited at 25/F, 363 Java Road, North Point, Hong Kong or by email at data.privacy@towngas.com.

The Group may update or change this policy from time to time without prior notice and these changes will be posted in the Group's website(s).