

香港駕駛學院私隱政策及個人資料收集聲明

1. 私隱政策聲明

我們的承諾

香港駕駛學院(下稱「本公司」或「我們」) 矢志妥善處理個人資料以保障客戶的私隱。本公司將確保我們及各聯營公司及代理就收集、使用、保留、披露、傳輸、保安及存取個人資料所採用的各項政策和實務守則，均符合《個人資料(私隱)條例》(香港法例第 486 章)(下稱「該條例」)，以及由香港個人資料私隱專員公署所發出的相關實務守則及指引之規定。本聲明中「個人資料」乃依照該條例的定義詮釋。

如本公司任何營運業務需遵從香港境外任何其他私隱法例(例如在香港境外營運)，則只要不抵觸相關地方的法例，本聲明亦會適用。

收集個人資料

我們或會不時要求閣下提供個人資料，包括但不限於閣下的姓名、性別、出生日期、身份證明文件號碼及/或副本、學習駕駛執照正本、駕駛執照正本、電話號碼、住址及/或其證明、電郵地址等。如閣下拒絕提供此等資料，可能令我們無法辦理閣下提交的任何申請或要求，又或使閣下無法存取我們的網站某些內容，又或導致閣下無法完成原擬在我們的網站辦理的事宜。如閣下尚未年滿 18 歲，必須獲得家長或監護人同意，方可向我們提交任何個人資料。

我們部份網站或會向廣告商披露不能識別個人身份的網站訪客綜合統計數據，部份網站亦會收集關於瀏覽訪客的綜合資料，例如到訪次數等統計數字。這類資料可能包括但不限於瀏覽器類型及版本、操作系統、IP 地址及/或域名。

除另行說明，否則閣下瀏覽我們的網站時我們只會收集閣下到訪的記錄，而不會收集閣下任何個人資料。我們的網站任何部份所設的 Cookies(如有)不會用於收集個人資料。Cookies 是可保存於網頁使用者電腦內的小型電腦檔案，功能是獲取配置資料及分析網頁使用者的瀏覽習慣。使用者儲存 Cookies 後，再次瀏覽網站便不必重新註冊。網站常會用 Cookies 追蹤使用者喜好的網站主題，閣下可修改相關的互聯網選項或電腦系統的瀏覽喜好設定，拒絕儲存 Cookies，然而閣下可能因此無法使用或啟動我們的網站提供的某些功能。我們的網站可能會攔截不接受 Cookies 的使用者。

為協助培訓員工、改善服務質素及釐清合約事宜，閣下與我們服務中心員工的對話可能會被錄音及/或錄影。

提供真確個人資料

閣下向我們申請使用服務，我們可要求閣下出示個人身份證明文件、學習駕駛執照、駕駛執照正本及/或地址證明等文件正本，相關資料經核對無誤後方始使用。

收集所得個人資料的用途

有關閣下的個人資料的具體用途已列載於以下我們的「個人資料收集聲明」第 2 部份(其中特別以第 2 部份第一段 i 至 vi 項為主要部分)。

當事人查閱及修正資料

根據該條例，閣下有權：

- i. 查詢我們是否持有閣下的個人資料；
- ii. 查閱我們記存的閣下個人資料；
- iii. 要求我們更正所記存不正確的個人資料；及
- iv. 查證我們(不時)就個人資料及持存個人資料類別制訂的政策和實務守則。

個人資料保安

我們經互聯網傳輸閣下的個人資料時會採用各種加密技術，確保只有我們授權的人員可存取資料。基於互聯網的運作性質，我們不能保證資料傳輸絕對安全。閣下可參閱以下第 3 部份「安全聲明」，以了解我們於保護經本網站收取的個人資料安全和避免遭受第三者非法干擾所採取之步驟。

關於存取個人資料的內部指引

我們所有員工均嚴格遵守「存取個人資料內部指引」。載有個人資料的實物記錄如非使用時一律存放於安全地點。我們嚴格管制員工存取實物及/或電腦資料，存取均需獲得適當的管理人員批准，而只有「必須知情」的人員才會獲准存取顧客的個人資料。我們記存、使用及/或傳輸顧客的個人資料時，必會採取適當的措施，防止意外及/或未經許可披露、更改、遺失及/或銷毀任何個人資料。

保留個人資料

如閣下是我們的學員，閣下在服務有效期間透過申請表格、互聯網或其他途徑向我們提供的個人資料，將會一直保留至服務終止後一段合理時間。我們會依照內部政策清除系統現存的不必要個人資料。

2. 個人資料收集聲明

閣下作為我們的學員或我們網站的訪客或使用者，向我們申請及/或持續使用任何服務時，或須向我們提供個人資料。若閣下提供的個人資料不全或失實，我們可能無法向你提供或繼續提供所需的服務。我們時刻均會保密閣下的個人資料。我們收集、使用、保留、披露、轉移、保安和查閱個人資料的政策及實務守則，一律遵從該條例及本聲明的規定。我們可使用和保留你提供的個人資料作以下任何用途，以及作雙方不時協定或法律規定的其他用途：

- i. 辦理閣下的服務申請及提供服務；
- ii. 在閣下同意的情況下，使用閣下的個人資料(包括姓名、性別、電話號碼、郵寄地址、電郵地址、出生年月、以及學員編號)推銷我們、我們的聯營公司、合作夥伴之服務

及/或產品(不論本公司有否就推廣收取報酬)。我們會以直銷電話、電郵、電子訊息¹、郵件等方式向閣下提供有關推廣資料。我們會於向閣下提供直銷推廣資料前徵詢閣下有關於服務及/或產品的個人喜好；

- iii. 辦理因應各項服務而向閣下提供的相關優惠；
- iv. 辦理閣下要求的任何付款指示及/或直接支賬付款安排及；
- v. 促進閣下網上戶口日常運作、提供顧客服務及/或收取閣下賬戶尚欠的服務收費；
- vi. 讓我們能防止罪行的發生；
- vii. 辦理閣下申請相關工作職位事宜。

¹ 電子訊息包括經以下途徑發出之訊息：手機短訊、多媒體訊息或跨平台流動短訊應用程式（例：智能手機短訊應用程式）。

我們可向下列各方披露及轉移閣下的個人資料(但只限於姓名和聯絡資料)，並可就以上目的使用、披露、處理或保存閣下的個人資料：

- i. 我們的代理、承辦商(包括客戶服務及銷售代理)及服務供應商就提供有關服務；
- ii. 我們的聯營公司及合作夥伴；
- iii. 銀行及金融機構；
- iv. 規管當局、執法機構及法院；及
- v. 我們的專業顧問及任何其他對我們承擔保密責任的人士。

此外，根據閣下與我們達成的協議或閣下給予我們的同意(視乎情況而定)，我們可向我們的聯營公司、合作夥伴披露或轉移閣下的個人資料，以作市場研究用途，此外並會用於確保閣下提供之個人資料就上述或其他目的及用途符合閣下不時和我們協定或遵照法律規定。

如閣下不希望收到我們所發送有關學習駕駛及/或上述其他類別之服務及/或產品之直銷宣傳推廣資料，或不希望我們披露、轉移或使用閣下的個人資料作上述直銷用途，歡迎各學員以電郵提出：comments@hksm.com.hk

3. 個人資料收集聲明 (職位招聘)

申請人提供的所有個人資料只用作評核申請人是否符合職位的要求。申請人如未能提供所需的所有資料，或所填寫的資料未能清楚顯示申請人具備有關職位所規定最低的學歷、訓練、經驗或其他條件，本公司將無法處理該項申請。

香港駕駛學院有限公司從職位申請者所收集的個人資料只供人力資源部員工及招聘部門主管或其授權同事審閱。根據《個人資料(私隱)條例》，你有權要求查閱及改正申請書上之個人資料。如欲提出要求，請向本公司人力資源部查詢。如本公司的附屬或聯營機構在此其間出現職位空缺，本公司或會將你的申請轉交有關機構考慮。申請人倘落選，其資料將於六個月內從公司檔案中刪除。

4. 安全聲明

儘管互聯網在本質上並非安全可靠的通訊環境，但用戶可運用適當的技術加強網絡安全性，然而，互聯網的安全並非純粹「技術」問題，個人及交易數據的保安常識及一般措施亦同樣重要。「黑客」需要有「門戶」才能入侵系統，而「門戶」大開往往是因為用戶傳遞機密文件或處理密碼、個人識別代碼等機密數據時疏忽大意，以致「黑客」有機可乘。因此用戶處理這類文件和數據時務需小心謹慎。

為嚴格保密從我們網站用戶獲取的所有個人資料，除使用防火牆和其他精密技術性設備外，我們還提供及設有其他嚴格的保安措施，以保護我們的系統、資料和數據，避免任何意外、惡意破壞或損毀。

5. 查詢

閣下如對本聲明有任何查詢，歡迎以電郵與我們聯絡：

電郵至: comments@hksm.com.hk

Privacy Policy and Personal Information Collection Statement

1. Privacy Policy Statement

Our Pledge

Hong Kong School of Motoring Limited (hereto, “The Company” or “We”) is committed to safeguard the privacy of individuals with respect to your personal data. The Company assures that our policies and practices, and those adopted by our affiliated companies and agents in relation to the collection, use, retention, disclosure, transfer, security and access of your personal data comply with the requirements under the Personal Data (Privacy) Ordinance (Chapter 486) (the “Ordinance”) under the laws of Hong Kong, as well as the relevant code of practice and guidance issued by the Office of the Privacy Commissioner for Personal Data, Hong Kong. The meaning of the term “personal data” adopted in this Statement is defined in the Ordinance.

Where our operations are subject to privacy legislation other than that of Hong Kong (such as due to our carrying out of operational functions outside of Hong Kong), this Statement shall apply so far as it is consistent with such local legislation.

Collection of personal data

At times, you may be required to provide your personal data including, but not limited to, your name, gender, date of birth, identity document number and/or its copy, learner’s driving licence, driving licence, telephone number, home address and/or its proof, email address etc. Refusal to provide such information may render us unable to handle any application or request you are making, or may deny you access to certain parts of our websites, or may otherwise defeat the objectives of your visit. If you are under the age of 18, consent from your parent or guardian is required before you provide us with any personal data.

Information relating to your use of our services, such as call/connection time, duration, origin and destination, may be automatically collected for our accurate reporting and administration of your accounts.

Some of our websites may disclose non-personally identifiable aggregate statistics relating to our visitors to advertisers. Some of our websites may collect aggregate information about our visitors, e.g. statistics on the number of visits. This type of data may include, but is not limited to, the browser type and version, operating system, IP address and/or domain name.

When you visit our websites, we will record your visit only and will not collect any personal data from you unless otherwise stated. Cookies used (if any) in any part of our websites will not be deployed for collecting personal data. For your information, Cookies are small computer files that can be stored in web surfers' computers for the purposes of obtaining configuration information and analyzing web surfers' viewing habits. They can save you from

registering again when re-visiting a website and are commonly used to track your preferences in relation to the subject matter of the website. You may refuse to accept Cookies by modifying the relevant Internet options or browsing preferences of your computer system, but to do so you may not be able to utilize or activate certain available functions in our websites. Our websites may bar users who do not accept Cookies.

Conversations between you and our Services Centers staffs may be recorded via video and tape for the purposes of staff training, improvement of service quality and clarification of contractual issues.

Accuracy of personal data

When you apply our services, data provided by you will be validated by using generally accepted practice. We may require you to show the original documentation before the data may be used, such as personal identification document and/or proof of address.

Use of personal data collected

Specific purposes for which your personal data may be used are set out in our “Personal Information Collection Statement” set out in Part 2 below (particularly those contained in points i through to vii in the first paragraph of Part 2 below).

Data access and correction

Under the Ordinance, you have the right to:

- i. Check whether we hold any of your personal data;
- ii. Access your personal data held by us;
- iii. Request us to correct any inaccurate personal data held by us; and
- iv. Ascertain our policies and practices established (from time to time) in relation to personal data and the types of personal data held by us.

Security of personal data

We use various encryption techniques to transmit via the Internet your personal data, which can only be accessed by our authorized personnel. Given the operational nature of the Internet, we cannot guarantee that the transmission is fully secure. Please refer to our “Security Statement” in Part 3 below for details on the steps that we have taken to ensure that any personal data collected by us via our websites is safe and secure to avoid unauthorized interference by third parties.

Internal Guidelines on Record Retention and Access to Personal Data

Our staffs are required to strictly adhere to our Internal Guidelines on Record Retention and Access to Personal Data. Physical records containing personal data are securely stored when

not in use. Access to such physical and/or computer records is strictly controlled and requires management approval. Approvals for access to customers' personal data are granted only on a "need to know" basis. Where we retain, use and/or transmit customers' personal data, we have put in place adequate measures to protect it from accidental and/or unauthorized disclosure, modifications, loss and/or destruction.

Retention of personal data

If you are a customer of ours, your personal data which you have given us via application form, internet or other means, during the service subscription period will be retained for a reasonable period after termination of your subscription. We will erase any unnecessary personal data from our system in accordance with our internal policy.

On-line Services

We may promote on-line stores or service providers operated by third party merchants on our website. If you want to use or order any services or products from them, please note that once the information that you provided is transferred to the relevant merchant, it will be beyond our control and thus outside the scope of protection afforded by us.

2. Personal Information Collection Statement

As a customer of our company, or a visitor or user of our website(s), it may be necessary for you to provide us with your personal data when you apply to us and/or continue to subscribe with us for any service. If your personal data is incomplete or incorrect, we may not be able to provide or continue to provide the services to you. We shall keep your personal data confidential at all times. Our policies and practices with respect to the collection, use, retention, disclosure, transfer, security and access of personal data will be in accordance with requirements under the Ordinance and this Statement. We may use and retain the personal data provided by you for the following purposes and for other purposes as shall be agreed between you and us or required by law from time to time:

- i.** Processing of your service application, and provisioning of the services;
- ii.** Subject to your consent, we may use your personal data (including name, gender, telephone number, postal address, email address, date of birth, as well as the usage, student number) for marketing the services and/or goods (irrespective of whether we are remunerated for such marketing activities) relating to us, our affiliated companies, and business partners. We may dispatch to you the promotional information via direct marketing telephone calls, e-mail, e-message¹, direct mailings etc. We will enquire your preference on nature of services/products before we provide you with the direct marketing promotional materials;
- iii.** Processing of any benefits for you arising out of the services;
- iv.** Processing of any payment instructions and/or direct debit facilities requested by you;

- v. Facilitating the daily operation of your online account, provisioning of customer services and/or the collection of overdue amounts in your account in relation to the services;
- vi. Enabling us in prevention of crime;
- vii. Processing of your job application.

¹E-message means electronic messages delivered via the following means: mobile short messaging service (SMS) / multimedia messaging services (MMS) / cross-platform mobile messaging application (e.g. smartphone messaging application)

We may disclose and transfer your personal data (only limited to your name and your contact information) to the following parties to use, disclose, process or retain your personal data for the purposes mentioned above:

- i. Our agents, contractors (including customer service and sales agents), and service providers for the provision of our services;
- ii. Our affiliated companies and business partners;
- iii. Banks and financial institutions;
- iv. Regulatory bodies, law enforcement agencies and courts; and
- v. Our professional advisers, and any other persons under a duty of confidentiality to us.

In addition, in accordance with your agreement with us or consent given to us (as the case may be), we may disclose and transfer your personal data to our affiliated companies and/or business partners for the purposes of carrying out market research and ensuring such personal data provided by you to us fulfills the aforesaid or other purposes as shall be agreed between you and us or as required by law from time to time.

If you do not wish to receive direct marketing promotional information related to driving learning from us, or do not wish us to disclose, transfer or use your personal data for the aforesaid direct marketing purposes, please contact us via email: comments@hksm.com.hk

3. Personal Information Collection Statement (Recruitment)

Except for items clearly marked as optional, the personal data provided are to enable the Company to assess if the applicant is qualified and suitable for the job in terms of qualification, training, experience, and any other requirements specified for the job. The Company will be unable to process the application if the information provided is incomplete or it is unclear from the information/documents provided that the applicant meets the minimum requirement for the post advertised.

The information provided will only be accessible to staff members of Human Resource Department and the Head of the recruiting department or his/her delegate(s) of Hong Kong School of Motoring Limited. Under the Personal Data (Privacy) Ordinance, you have a right to request access to, and to request correction of, your personal data in relation to your

application. If it is required, please contact our Human Resources Department. When there are vacancies in our subsidiaries or associated companies during that period, we may transfer your application to them for consideration of employment. All information of unsuccessful candidates will be erased from our files within 6 months.

4. Security Statement

While internet is not an inherently secure environment for communications, security of internet communications can be enhanced by the application of appropriate technology. However, internet security is not solely a technical issue, knowledge on security of personal and transaction data as well as general measure are equally important. "Hackers" could only attack a system through a "door" . However, in most cases imprudent transmission and handling of sensitive data such as confidential documents, password, personal identifiers etc. would facilitate unauthorized access to such a "door" by "hackers". Hence, internet users should be cautious when handling such kind of sensitive documents and data.

In order to prudently preserve all personal data obtained from users of our websites, apart from firewalls and other sophisticated technical facilities, we also provide and maintain other stringent security measures so as to protect our system as well as the information and data retained therein from accidental or malicious destruction or damage.

4. Enquiries

Should you have any enquiries concerning this Statement, please feel free to contact us via email at:

By email :

comments@hksm.com.hk