

私隱政策

1. 引言

1.1 本私隱政策的目的

賽馬會逆境同行食物援助計劃（於本私隱政策中稱為「計劃」或「我們」）尊重您的私隱，並承諾保護您的個人資料。我們會盡力遵守《個人資料(私隱)條例》所列載的規定，依照收集資料時所說明的目的使用該等資料，並確保個人資料得到妥善儲存。閣下提供予本機構的個人資料(包括姓名、電話、傳真、電郵及郵寄地址等)，只用於本計劃服務申請、通訊、服務推廣或收集意見等。

本私隱政策將告訴您，在您透過<https://jcfoodprog.hk>（「網站」）訪問我們時，我們如何看管您的個人資料，不論您從何處訪問該等網站，並告訴您有關您的私隱權利以及法律如何保障您。

本私隱政策旨在向您提供有關我們如何透過您使用網站收集及處理您的個人資料的訊息，包括您在註冊我們的服務時可能透過網站提供的任何資料。

當你閱讀我們就收集或處理有關您的個人資料所根據特定情況提供的任何其他私隱政策或公平處理政策時，請務必同時閱讀本私隱政策，以便您可以充分了解我們如何及為何使用您的資料。本私隱政策是對其他通知及私隱政策的補充，並非旨在取代該等通知及私隱政策。

1.2 資料控制人

項目經理是您的資料的「資料控制人」。

簡而言之，這意味著我們(i)「控制」您的個人資料，包括確保其安全保存；及(ii)就有關如何使用及保護您的個人資料作出某些決定，但僅限於我們已通知您有關該使用或法律允許的其他情況。

1.3 聯絡資料及投訴

如您對本私隱政策或我們使用您的個人資料有任何疑問，請透過enquiry@jcfoodprog.hk聯絡我們個人資料私隱專員，或致函至：

香港灣仔石水渠街 85 號

聖雅各福群會大樓 13 樓

個人資料私隱查詢

(註明保密)

1.4 本私隱政策及個人資料的變更

我們會定期檢視本私隱政策。我們或會不時修訂或更新我們的私隱政策。請注意，本政策事前毋須另行通知即可不時修訂，閣下應定期查閱最新版本。本聲明的中文及英文版本如有不符或互相牴觸，一概以英文版本為準。

1.5 第三方鏈接

網站或會包括指向第三方網站、插件及應用程式的鏈接。點擊這些鏈接或啟用這些連接，或會允許第三方收集後共享有關您的資料。我們並不控制這些第三方網站，對於其私隱聲明亦不承擔責任。當您離開我們的網站時，我們鼓勵您閱讀您訪問的各網站之私隱政策。

2. 我們收集的有關您的資料

我們收集、使用及存儲的有關您的個人資料類型取決於您要求我們提供的服務及／或您與我們互動的性質。當使用我們的網站時，我們收集及處理以下類型的個人資料：

- 您聯絡人的名字、身份證(首 4 位數字) (「**身份資料**」)；
- 您的居住地址、送貨地址、電郵地址及電話號碼 (「**聯絡資料**」)；
- 您的 IP 地址、您的登錄資料、瀏覽器類型及版本、時區設置及位置、瀏覽器插件類型及版本、操作系統及平台，以及您用作進入網站或應用程式的設備的其他技術 (「**技術資料**」)；
- 您的申請資料、工作現況、家庭現況、資產、家庭入息、健康、您的偏好、反饋及調查回覆 (「**檔案資料**」)；
- 有關您如何使用我們的網站及其他服務的資料，例如您如何申請我們的服務(「**使用資料**」)。

您們的活動相片有可能用作服務推廣及服務報告。除非我們已取得您的同意，否則我們不會使用您們的個人資料作上述用途。您可以隨時向本機構提出要求停止使用您們的個人資料，此項安排毋須繳付任何費用。

我們不會收集有關您的任何特殊類別的個人資料(這包括有關您的種族或民族、宗教或哲學信仰、性生活、性取向、政治觀點、工會會員資格的詳情，以及遺傳和生物識別資料)。我們也不會收集有關刑事定罪和違法行為的任何資料。



3. 我們如何收集您的資料

3.1 直接互動

我們收集您透過填寫表格或透過郵寄、電話、電郵或其他方式與我們通訊而向我們提供與您相關的身份資料、聯絡資料及檔案資料。這包括您進行以下事項時提供的個人資料：

- 申請我們的服務；
- 參加活動或調查；或
- 給予我們反饋，或以任何方式或形式聯絡我們。

4. 我們如何使用您的個人資料

4.1 資料使用

我們承諾僅在法律允許的情況下使用您的個人資料。我們通常會在以下情況使用您的個人資料：

- 當我們需要履行我們服務時（「**服務履行**」）。
- 當我們的合法權益（或第三方的合法權益）需要，而您的權益及基本權利並不凌駕該等權利時（「**合法權益**」）。
- 當我們需要遵守法定義務時（「**法定義務**」）。

我們計劃為以下目的及根據相應法律依據而使用您的個人資料：

目的	資料類型	服務依據及合法權益基礎
服務申請	身份資料； 聯絡資料； 檔案資料。	服務履行
處理您的申請	身份資料； 聯絡資料； 檔案資料。	服務履行；
處理您的服務	身份資料； 聯絡資料；	服務履行；
管理我們與您的關係	身份資料； 聯絡資料； 檔案資料。	合約履行； 法定義務；

（即有關私隱政策變更及請您留下評論或作出調查的通知）		合法權益（保持您的記錄更新，及研究如何運作食物捐贈，提升我們的服務）。
管理和保障我們的網站及應用程式（包括故障排除、數據分析、測試、系統維護、支援報告及數據託管）	身份資料； 聯絡資料； 技術資料。	合法權益（為經營我們的業務，提供管理及 IT 服務、網絡安全，防止欺詐以及在業務重組或集團重組活動的情況下）； 法定義務
使用數據分析以改善我們的網站、應用程式、產品／服務、客戶關係及體驗	檔案資料； 使用資料； 技術資料。	合法權益（為我們的產品及服務界定客戶類別，保持我們的網站及應用程式更新及屬相關，發展我們的業務，並為我們的服務策略提供資料）。
有關您可能有興趣的服務的建議及推薦	身份資料； 聯絡資料； 檔案資料； 使用資料。	合法權益（開發我們的產品／服務，及增長我們的業務）

我們只會使用您的個人資料作我們收集該等資料所為之用途，除非我們合理認為我們由於其他原因而需要使用該等資料，而該原因與原始用途相符。如您想獲得關於為作新用途的處理如何與原始用途相符之解釋，請隨時與我們聯絡。

請注意，如法律要求或允許，我們或會在您不知情或未經您同意的情況下，根據上述規則處理您的個人資料。

4.2 銷售及推廣

因我們為一個服務資訊分享平台，除社會服務資訊外，我們不會向您提供任何其他銷售及推廣。

在將您的個人資料分享給任何第三方前，我們會先得到您明確的同意。

4.3 取消訂閱

您可隨時聯絡我們或第三方來取消訂閱推廣訊息：—

- 任何時候透過 enquiry@jfoodprog.hk 來聯絡我們。



即使您取消訂閱這些訊息或通訊郵件，這個變更不會應用於計劃的服務處理（基於規管或法律義務，我們會繼續處理這些資料，以履行與您的服務）。

5. 披露您的個人資料

我們或會將您的個人資料分享給以下各方，以用作上面表格列出的用途：

- 下方所述第 9 條（定義）中的外部第三方。

我們要求所有第三方按照法例妥善保障您個人資料的安全。我們不允許我們的第三方服務供應商使用您的個人資料作私人用途，只准許他們按我們的指示處理您的個人資料作特定用途。

6. 資料安全性

我們已實施適當的保安措施，防止您的個人資料意外遺失、在未經授權下被使用或存取、更改或披露。此外，我們規定您的個人資料僅限需要知道該等資料的僱員、承辦商和其他第三方存取。該等人士僅會在我們的指示下處理您的個人資料，並受保密責任所管制。我們已採取程序，處理任何懷疑個人資料外洩的事件。當我們依法有責任就外洩事件通知時，我們將通知您和任何適用的監管人。

7. 資料保留

我們僅會在屬合理所需的時間內（於計劃結束後 6 個月），為達到我們收集您的個人資料目的的情況下，包括為符合任何法律、監管、稅務、會計或通報要求的目下，保留您的個人資料。在投訴或倘若我們合理地相信就我們與您的關係可能出現訴訟的情況下，我們或會以更長時間保留您的個人資料。

在決定您的個人資料的合適保留期時，我們考慮該等個人資料的數量、性質和敏感程度、在未經授權下使用或披露您的個人資料的潛在危害風險、我們處理您的個人資料的目的及我們能否透過其他方法達到該等目的，以及適用的法律、監管、稅務、會計或其他要求。

在某些情況下，您可以要求我們刪除您的資料：詳情請參閱第 8 條（您在香港的法律權利）。

在某些情況下，為研究或統計目的，我們會將您的個人資料匿名化（以令該等資料不再與您有關）。在該等情況下，我們或會無限期使用此等資料，而無需事前通知您。

8. 您在香港的法定權利

倘若您現時正留在香港，根據《個人資料（私隱）條例》（香港法例第 486 章）（「該條例」），您有權檢查我們是否持有與您相關的資料，並查閱該等資料。倘若該等資料有任何不正確或不準確之處，您有權作出更正或更新。請透過 enquiry@jcfoodprog.hk 向我們發送有關查閱或更正個人資料的要求。根據該條例，我們有權就處理任何資料查閱或更正要求收取合理的費用。

9. 定義

在本私隱政策中，除非文義另有規定，否則以下詞彙具有下列含義：—

「外部第三方」是指(a)捐助機構香港賽馬慈善信託基金及其指定審查機構；及 (b) 在香港提供社會服務、IT 及系統管理服務及物流服務的服務供應商；及 (c) 在某些情況下要求申報處理活動的香港稅務局、監管機構及其他當局。

「合法權益」是指我們在進行及管理業務以使我們得以向您提供最佳服務／產品以及最佳和最安全體驗的業務權益。我們確保我們在為合法權益而處理您的個人資料前，考慮並平衡對您的任何潛在影響（包括正面的和負面的）以及您的權利。我們不會把您的個人資料用於我們的權益被對您的影響所凌駕的活動（除非我們得到您的同意，或法律所要求或允許）。您可透過聯絡我們，取得有關我們如何就特定活動評估我們的合法權益與對您的任何潛在影響的進一步資料。

「法定義務」是指在為遵從我們須遵守的法定義務屬必要的情況下處理您的個人資料。

「服務履行」是指在為履行您為其中一方的服務前應您的要求採取措施屬必要的情況下處理您的資料。

10. 不接受上述政策的安排

您可以拒絕所有上述安排，如您拒絕安排，請注意你亦無法取得申請服務，故此您的申請亦會取消。



PRIVACY POLICY

1. INTRODUCTION

1.1 Purpose of this Privacy Policy

Jockey Club Food Assistance Programme (referred to in this Privacy Policy as “Jockey Club Food Assistance Programme”, “we”, “us” or “our”) respects your privacy and is committed to protecting your personal data. We are committed to strictly follow the provisions of the Personal Data (Privacy) Ordinance and use the collected personal data only for purposes for which the data were to be used at the time of collection and ensure that personal data are securely and safely kept. Your personal data (including name, telephone number, fax number, email and mailing address etc.) will only be used for the purposes of application, communication, service promotion and feedback collection in this programme.

This Privacy Policy will inform you as to how we look after your personal data when you visit us at <https://icfoodprog.hk> (the “Website”), regardless of where you visit them from, and tell you about your privacy rights and how the law protects you.

This Privacy Policy aims to give you information on how we collect and process your personal data through your use of the Website, including any data you may provide through the Website when you sign up to our newsletter, or request services and/or take part in a event. It is important that you read this Privacy Policy together with any other Privacy Policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Policy supplements other notices and Privacy Policies and is not intended to override them.

1.2 Data Controller

Project manager is a “data controller” of your personal data.

In simple terms, this means that we (i) “control” your personal data, including making sure that it is kept secure; and (ii) make certain decisions on how to use and protect your personal data, but only to the extent that we have informed you about the use or as otherwise permitted by law.



1.3 Contact Information and Complaints

If you have any questions about this Privacy Policy or any questions regarding our use of your personal data, please contact us at enquiry@jcfoodprog.hk or post to

St. James' Settlement

13/F, 85 Stone Nullah Lane,

Wan Chai, Hong Kong

Marked Personal Data Privacy Enquire

1.4 Changes to this Privacy Policy and Personal Data

This Privacy Policy is regularly reviewed. Please note that this Policy may be amended from time to time without prior notice. You are advised to check for the latest version on a regular basis. If there is any inconsistency or conflict between the English and Chinese versions of this Statement, the English version shall prevail.

1.5 Third-Party Links

The Website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our Website, we encourage you to read the privacy policy of every website you visit.

2. THE DATA WE COLLECT ABOUT YOU

The types of personal data we collect, use and store about you will depend on the services you have requested from us and/or the nature of your interaction with us. When using our Website, we collect and process the following types of personal data:

- your first name, last name, or similar identifier, HKID no. (first four digits) ("**Identity Data**");
- your living address, delivery address, email address and telephone numbers ("**Contact Data**");
- your IP address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access the Websites or the App ("**Technical Data**");
- your application record made by you, your current job duty, family situation, asset, monthly household income, health, preferences, feedback and survey responses ("**Profile Data**");



- information about how you use our Websites, and other services, for example, how often you come to our website (“**Usage Data**”).

Activity photos of the service users may be used for promotional purposes and in service reports. Unless the individual concerned has given his/her consent, the organization will not use your personal data for the above purposes. Upon your request, we will cease to use your personal data without charging any fee.

We do not collect any special categories of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

3. HOW WE COLLECT YOUR DATA

3.1 Direct Interactions

We collect Identity Data, Contact Data and Profile Data about you that you provide to us by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- apply for our services;
- enter an event or survey; or
- give us feedback or contact us in any way or form.

4. HOW WE USE YOUR PERSONAL DATA

4.1 Data Usage

We are committed to only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the service we are about to enter into or have entered into with you (“**Performance of Service**”).
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests (“**Legitimate Interests**”).
- Where we need to comply with a legal obligation (“**Legal Obligations**”).

We plan to use your personal data for the following purposes, and pursuant to the corresponding legal bases:

Purpose	Type of Data	Lawful Basis and Basis of Legitimate Interest
Applying the service	Identity Data; Contact Data; Profile Data	Performance of Service
Processing your application	Identity Data; Contact Data	Performance of Service
Processing your service	Identity Data; Contact Data;	Performance of Service
Management of our relationship with you (i.e. notifications about changes to Privacy Policy and asking you to leave a review or take a survey)	Identity Data; Contact Data; Profile Data;	Performance of Service; Legal Obligations; Legitimate Interest (to keep your records updated and to study what service the user need in order to improve the service).
Administration and Protection of our Websites (including troubleshooting, data analysis, testing, system maintenance, support reporting and hosting of data)	Identity Data; Contact Data; Technical Data;	Legitimate Interest (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise); Legal Obligations
Using data analytics to improve our Websites, products/services, marketing, customer relationships and experiences	Profile Data; Usage Data; Technical Data.	Legitimate Interest (to define types of customers for our products and services, to keep our Website updated and relevant, to develop our service and to inform our operation strategy).
Suggestions and recommendations about goods or services that may be of interest to you	Identity Data; Contact Data; Profile Data; Usage Data;	Legitimate Interest (to develop our products/services).



We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please feel free to contact us any time. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

4.2 Marketing and Promotional Offers

As the website is an information sharing platform, we may not provide you any marketing information other than social information (such as other funding resources, other relevant service information etc.).

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

4.3 Opting Out

You can ask us or third parties to stop sending you marketing messages at any time by:-

- by contacting us anytime at enquiry@jcfoodprog.hk.

Where you opt-out of receiving these marketing messages or newsletters, this will not apply to personal data provided to us as a result of service provide (which we will continue to process in order to perform the service with you or as a result of our regulatory or legal obligations).

5. DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data with the following parties for the purposes set out in the table above:-

- External Third Parties as set out in Clause 9 (*Definitions*) below; and

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.



6. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

7. DATA RETENTION

We will only retain your personal data for as long as reasonably (6 months after the project is completed) necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances, you can ask us to delete your data: see Clause 10 (*Your Legal Rights within Hong Kong*) below for further information.

In some circumstances, we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

8. YOUR LEGAL RIGHTS IN HONG KONG

If you are currently staying in Hong Kong, you are entitled, in accordance with the Personal Data (Privacy) Ordinance (Cap. 486, the laws of Hong Kong) (the “**Ordinance**”), to check whether we hold data about you and to have access to those data. If any of these data are incorrect or inaccurate, you have the right to correct or update them. Requests for access to or to correct personal data should be addressed to us at enquiry@jcfoodprog.hk accordance with the Ordinance, we are entitled to charge a reasonable fee for processing any data access or correction requests.



9. DEFINITIONS

In this Privacy Policy, the following expressions shall have the following meanings except where the context otherwise required:-

“External Third Parties” shall mean (a) funding organization, The Hong Kong Jockey Club Charities Trust, and the designated audit service agencies; and (b) service providers based in Hong Kong who provide the social services, IT and system administration services, and logistics support; and (c) the Inland Revenue Department, regulators and other authorities based in Hong Kong who require reporting of processing activities in certain circumstances.

“Legitimate Interests” shall mean the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

“Legal Obligations” shall mean processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

“Performance of Service” shall mean processing your data where it is necessary for the performance of the service to which you are a party or to take steps at your request.

10. THE CONSEQUENCE OF NOT ACCEPTING THIS POLICY

You can refuse the policy above. If you refuse the policy, please note that the service will not be accessible, and your application will be canceled too.