



The Hong Kong Jockey Club- Public Riding Schools

Privacy Policy Statement

Notice relating to the Personal Data (Privacy) Ordinance

The Public Riding Schools (the “School”), operated by The Hong Kong Jockey Club, is committed to ensuring the privacy and security of the personal data it holds. We aim to meet this commitment by implementing the principles and requirements of the Personal Data (Privacy) Ordinance of the Hong Kong Special Administrative Region (“the Ordinance”). This Privacy Policy Statement is intended to explain our privacy practices.

For the purpose of this Privacy Policy Statement, The Hong Kong Jockey Club and its subsidiaries shall together be referred to as “the Club” and each “a Club Entity”. You may obtain details of subsidiaries of The Hong Kong Jockey Club from the annual report of The Hong Kong Jockey Club or contacting the Data Privacy Compliance Officer of The Hong Kong Jockey Club.

Collection of Personal Data

From time to time and for the purpose of carrying on the School's businesses and operations, including the provision of services and facilities to you, you may be requested to supply data that may directly or indirectly identify you or other person(s) as an individual ("Personal Data") such as, but not limited to, the following:

- Contact information such as your name, email address, mailing address, telephone number, and fax number;
- Information about you such as your birth date, medical information, personal preferences;
- Membership number and details;
- Unique identifiers such as your HKID and passport number;
- Billing information such as your credit card number, bank account information, and billing address;
- Demographic information such as age, gender, nationality, marital status, preferences, education background, and employment history.

Supply of Personal Data to the School is non-obligatory, but failure to do so may result in the School being unable to process your application(s) or to provide facilities and services to you.

Occasionally, you may need to provide Personal Data about other individuals to the School (e.g. spouse or children or guests). In that event, to comply with the Ordinance, you are required to have first obtained the authorisation of such individuals before using, disclosing and transferring their Personal Data, including giving consent on their behalf to the School's possible use, disclosure and transfer of their Personal Data, for the purposes you would want to achieve from the School. If necessary, the School may require you to provide to the School any supporting documents which may be necessary to prove such authorisation. You should also advise them that the School can be contacted for further information.

Use of Personal Data

Your Personal Data may be used for the following purposes:

1. Carrying out the School's operations and provision of facilities and services;
2. Conducting checks regarding eligibility for using the facilities and services applied for;
3. For marketing, promotional and customer management purposes, such as sending you offers and promotions (please see further details in "Direct Marketing" below);
4. Facilitating communications between you and the School;
5. Matching (as defined in the Ordinance) your Personal Data with other data collected (by the School or third parties) for other purposes, in relation to, the provision of facilities, goods and services to you and/or the performance of any transactions and administration work related to the School's operations;
6. Maintaining and developing the School's business systems and infrastructure, including testing and upgrading of these systems;
7. Meeting any obligations, requirements or arrangements, whether compulsory or voluntary, of the School to comply with, or in connection with:
 - a. any law, regulation, judgment, court order, sanctions regime, within or outside the Hong Kong Special Administrative Region ("Hong Kong") existing currently and in the future;
 - b. any guidelines, guidance, demand or requests given or issued by any legal, regulatory, governmental, tax, law enforcement or other authorities within or outside Hong Kong; or
 - c. any of the School's rules or bye-laws relating to the Club's core operations.
8. Complying with any obligations, requirements, policies, procedures, measures or arrangements for sharing data and information of the School and/or any other use of data and information in accordance with any programmes for compliance with sanctions or prevention or detection of money laundering, terrorist financing or other unlawful activities; and/or

9. Prevention, detection or investigation of crime.

We may from time to time also use aggregate non-identifying information about our customers to better design and improve our facilities and services that we offer. This information will not identify any individual in particular.

Direct Marketing

The School intends to use your Personal Data for direct marketing carried out by the School, the Club or a Club Entity (or by an agent on behalf of the School, the Club or a Club Entity). The intended kinds of Personal Data to be used and the intended classes of marketing subjects are specified below. However, we may not so use or provide your Personal Data unless we have received your consent.

For the above direct marketing use, the School intends to:

- use your name, contact information and demographic information; and
- market or promote the following classes of facilities, services, support, and related events and activities offered or arranged by the School, the Club or a Club Entity:
 - The School's or equestrian related facilities, services, and training, instruction or competitions;
 - horse riding related apparel, equipment or accessories;
 - charitable or non-profit making causes including art, communities services, conservation, culture, education, environmental protection, healthcare, music, recreation, and sports.

You can always opt-out free-of-charge by contacting The Hong Kong Jockey Club's Data Privacy Compliance Officer if you no longer wish any of your Personal Data to be used in any of the described direct marketing purposes.

Disclosure of Personal Data

Personal Data supplied to the School and/or the Club will be kept confidential. However, the School and the Club may, where such disclosure is necessary to satisfy the purpose, or a directly related purpose, for which the Personal Data was collected, provide such Personal Data to the following parties:

1. any Club Entity for fulfilling the purposes for which it was collected (subject to any consent requirement relating to "Direct Marketing" above), and to the School and/or the Club's business partners for direct marketing use as described in "Direct Marketing" above;
2. any person or company who is acting for or on behalf of the School and/or the Club, or jointly with the School and/or the Club, in respect of the purpose or a directly related purpose for which the data was provided;

3. any other person or company who is under a duty of confidentiality to the School and/or the Club and has undertaken to keep such information confidential, provided such person or company has a legitimate right to such information;
4. the School and/or the Club's agents, contractors, suppliers and any third party service provider who provides administrative, marketing and research, distribution, data processing, telemarketing, telecommunications, computer, payment or other services to the School and/or the Club in connection with the operations of its business;
5. government and regulatory authorities, investigative bodies and law enforcement agencies and other organisations, as required or authorised by law;
6. any financial institutions, including banks, necessary to establish and support the payment of any services and facilities provided to you; and
7. your authorised representatives or your legal advisers when requested by you to do so.

The School and/or the Club may also disclose your Personal Data to third parties: (i) when required by law, by court order or in response to a search warrant or other legally valid inquiry; or (ii) pursuant to the School and/or the Club's good faith belief that disclosure is required by law or otherwise necessary to the establishment of legal claims or defences, to obtain legal advice, to exercise and defend the School and/or the Club's legal rights or to protect the life, body or property of any individual. This also applies when the School and/or the Club has reason to believe that disclosing the Personal Data is necessary to identify, contact or bring legal action against someone who may be causing interference with the School and/or the Club's rights or properties, whether intentionally or otherwise, or when anyone else could be harmed by activities causing such interference.

The School and/or the Club may also transfer any information it holds about you as an asset in connection with a merger or sale (including transfers made as part of insolvency or bankruptcy proceedings) involving all or part of the School and/or the Club or as part of a corporate reorganisation or other change in corporate control.

The Personal Data that the School and/or the Club collects or obtains may be transferred to jurisdictions that offer lesser protection of personal data than that provided in your jurisdiction. By submitting Personal Data to the School and/or the Club or using any of the School and/or the Club's services and facilities, you understand and consent to such transfer.

Links to Third Party Websites

The School and/or the Club's website may contain links to other sites and pages which are operated by third parties. The School and/or the Club has no control over the content of the linked websites or the way in which the operators of those websites deal with your Personal Data. You should review the privacy policy for those third party websites to understand the ways in which your Personal Data may be used by those third parties.

Use of Cookies

By using the School's and/or the Club's websites ("Websites") and mobile apps, you agree that the School and/or the Club can store and access cookies, IP addresses and use other methods in order to collect website usage data and improve your on-line experience.

Cookies are small files that are placed on your computer by websites that you visit or certain emails you open. They are widely used in order to make websites function properly, as well as to provide business and marketing information to the website owners.

The School and the Club use cookies on the Websites to track visitor preferences. These cookies allow the Websites to remember information that changes the way the Websites behave or look, such as your preferred language. These cookies can also assist you in changing text size, font and other parts of the Websites that you can personalise. You may refuse to accept cookies by altering the settings on your internet browser but it should be noted that if you choose not to permit cookies, some areas of the Websites may not function properly.

Data Retention

Unless there is a specific legal requirement for us to keep the data, we will take all reasonably practicable steps to erase your Personal Data that is no longer required for the purposes for which the data was originally collected.

Commitment to Data Security

The School is committed to protecting the security of your personal information. We use a variety of physical, technological and organisational measures to help protect your Personal Data from unauthorised or accidental access, processing, erasure or other use.

Changes to the Privacy Policy Statement

We will post on our website at www.hkjcridingschools.com any changes to our Privacy Policy Statement, so that you will always know what information we gather, how we might use that information and whether we disclose it to anyone.

Access to and Correction of Personal Data

You are entitled to request access to Personal Data held by the School about you and to correct such data. In accordance with the terms of the Ordinance, we may charge a reasonable fee for the processing of such data access requests.

You may direct your request in writing to:

Data Privacy Compliance Officer of the Hong Kong Jockey Club
Jockey Club Headquarters
1 Sports Road
Happy Valley, Hong Kong