

## TGT GOez WiFi App Privacy Policy Statement

This Privacy Policy Statement (this “**Privacy Policy**”) describes how Towngas Telecommunications Fixed Network Limited (the “**Company**”, “**we**”, “**us**”) collects, uses, discloses, processes, and protects the personal information you provide to us through the TGT GOez WiFi mobile application (the “**GOez**”) when using our products or services. If we ask you to provide certain information in order to verify your identity when using our products or services, we will use this information in strict accordance with this Privacy Policy and/or our Terms and Conditions.

This Privacy Policy was developed in accordance to the Personal Data (Privacy) Ordinance, Cap. 486, Laws of Hong Kong (the “**Ordinance**”) and with full consideration of your needs taken into account. It is important that you fully understand our personal data collection and usage practices as well as full confidence that ultimately, you have control of any personal information provided to us. By using our products or services, you agree to the terms of this Privacy Policy and consent to the collection, use and disclosure of your personal information.

In this Privacy Policy, “**personal information**” means information that is relating directly or indirectly to you; from which it is practicable for the identity of you to be directly or indirectly ascertained; and in a form in which access to or processing of the data is practicable. Such personal information may include but not limit to the information you provide to us or upload.

In this Privacy Policy, “**you**” includes the account holder of the GOez and the user of our services and products controlled through or connected to the GOez.

By using the GOez, our products or services controlled by or connected with the GOez or other acting permitted by the applicable laws, you are deemed to have read, acknowledged and accepted all the provisions stated herein this Privacy Policy, including any changes we make from time to time.

### **Personal Data Collected**

In order to provide our services to you we will ask you for personal information that is necessary for us to successfully provide those services. If you do not provide us with this personal information, we may not be able to provide our products or services to you.

We will only collect the personal information that is necessary for its specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those

purposes. We may collect the following types of information (which may or may not be personal information):

**Information you provide to us or upload** (including your contact details): The Company may ask for your name, e-mail address, gender, date of birth, mailing and billing address, telephone number, account number, or data you may sync with the Home Gateway (the “**Device**”) you use to access the GOez, information used to create your account or related to your account setup on the GOez, devices you add or information that you send, and feedback.

**Data:** Data including web server data relating to your online session (to provide aggregated, anonymous, statistical information for purposes of service development and taking necessary actions in respect of any illegal or unlawful contents on any website visited through our web servers) which does not identify you as an individual and is not personal data including IP address, domain name, URLs, browser type and version and operating system.

**Information related to the handheld device terminal or your SIM card:** we may collect information related to the operation of the GOez handheld device terminal. For example, IMEI number/OAID number, GAID number, IMSI number, the version of your operating system, manufacturing information about your device, model name, and network operator. We may also collect information about the device associated with your account. For example, MAC address, DID, network status of the device (IP/network signal), and the version of your firmware.

**Information relating to your social media profiles:** We may collect and use the information relating to your social media profiles if your social media accounts are linked with the GOez and/or your login details are authenticated by third party social media platforms.

**Information we designate that is about you:** We may collect and use content such as information related to your GOez account.

**Information related to your application usage:** including unique identifiers for application (e.g. VAID number, OAID number, AAID number, Instance ID), application basic information, such as application list, application ID information, SDK version, system update settings, application settings (region, language, time zone, font), the time the application enters/exits the foreground and application status record (e.g. downloading, installing, updating, deleting).

**Location information** (only for specific services/ functionalities): various types of information on your accurate or approximate location. For example, region, country code, city code, mobile network code, mobile country code, cell identity, longitude and latitude information, time zone settings, language settings.

**Log information:** information related to your use of certain functions, apps and websites. For example, cookies and other anonymous identifier technologies, IP address, network request information, temporary messaging history, standard system logs, crash information and log information generated by using the services (such as registration time, access time, activity time, etc.

**Other information:** browsing and networking history, data usage, environmental characteristics value (ECV) (i.e. value generated from the GOez Account ID, phone device ID, connected Wi-Fi ID, behavioural information (e.g. browsing preference, touchpoint interaction, response to advertisements, etc.) and location information).

**Account credentials:** information related to your account credentials. For example, e-mail address, password, password security questions and answers, etc.

We may also collect other types of anonymous information which are not directly or indirectly linked to an individual and which is aggregated, anonymized or de-identified. Such information is collected in order to improve the services we provide to you.

## **Purpose**

Personal information is collected for providing services and/or products to you, and legal compliance on our part under applicable laws. You hereby consent that we may process and disclose personal information to our affiliated companies, Third Party Service Providers (defined below) for the purposes stated in this Privacy Policy.

The Company may use any personal information for the purposes including, without limitation, any of the following:

- (a) to subscribe or register the Services;
- (b) to open and maintain your accounts;
- (c) to provide, process, improve, manage, operate, develop and maintain the GOez and our products and/or services we provide to you, and services provided through your device or by the GOez;

- (d) to conduct researches, surveys and analyses to better understand your preferences and interest for offering you a personalized experience, or for the enhancement of the Services;
- (e) to provide after-sales and maintenance services;
- (f) to conduct marketing related activities, such as providing marketing and promotional materials and updates (please refer to “Use of Your Personal Data in Direct Marketing” section below for further information);
- (g) to send you updates about our terms and conditions, the features and services of the Company;
- (h) to establish and maintain your logged-on identity so that you can use the GOez without having to log on again;
- (i) to communicate with you about your device, service, your complaints, comments, enquiries, questions or other requests related to our services and/or the GOez;
- (j) to communicate with you about any general queries, such as updates, device firmware/software updates, customer support, related information, and notices;
- (k) to generate and/or track anonymous analytics data to improve the Services;
- (l) to perform internal operations, including, for example, to prevent fraud and abuse of Services, to troubleshoot bugs and operational problems and to conduct data analysis to transfer to our agents and affiliates within and outside of Hong Kong for the performance of the Services (please see further details in the section entitled “Transfer of Personal Data” below);
- (m) to comply with any law, court order, regulations, codes of conducts, other legal compulsion or guidelines applicable to us and/or any member of the Group (as defined below); and
- (n) any other purposes in connection with the Services which we may notify to you or to further your interaction with us.

In addition, we may also use your information (which may include personal information) which we collected when you create a GOez account is used for creating the personal GOez account and profile page for you. Including:

- (a) Providing location-based services. When using the GOez and accessing the GOez controlled or connected devices, we may use information about your location to determine the time zone of the device. This will ensure that the device accurately displays the correct time and login service area. It will also optimize your experience by providing services such as recording the data usage of the devices and the activities of the devices. You can turn off this feature at any time by going to device settings or by discontinuing your use of this application.

- (b) Display of device status. This allows you to view the online status of the device remotely that you can check at any time.
- (c) Verification of user identity. The GOez uses EVC to verify user identities and ensure that hackers or other unverified persons are unable to log in.
- (d) Allowing you to use Security. Information collected may be used for security and system up-keeping functionalities, such as security scan, blocklist, cleaner, etc. Some of these functionalities are operated by third party service providers and/or business partners (for more information see "Transfer of Personal Data" section below). Information (which is not personal information like virus definition lists) is used for security scan functions.
- (e) Collecting user feedback. The feedback you choose to provide is extremely valuable, as it helps us improve the services provided by us. In order to track your feedback, we may use the personal information you provide to contact you and to keep records.
- (f) Sending notifications. We may occasionally use your personal information to send important notifications, for example, notifications about the status of device malfunctions; unauthorized access and usage, your customized device push notifications (which depend on what additional equipment you have purchased); and changes to our terms and conditions, and policies. You can turn off or restrict this feature at any time by changing the preferences listed under "Settings" in the GOez.

We will not transfer your personal data to others except for the specific classes of data transferees as listed in the "Purpose" section above. If you are a minor, you must ask your parents or guardian before providing any personal information to us.

### **Transfer of Personal Data**

Your personal data held by the Company will be kept confidential but the Company may provide such information to one or more of the following classes of persons (whether within or outside Hong Kong) for the purpose set out under the "Purpose" section above:

- (a) any parent or controlling company of the Company and its parent or controlling company, and any of the subsidiaries and associated companies of such parent or controlling company, and any of the subsidiaries and associated companies of the Company (collectively called the "**Group**");
- (b) any agent, contractor or third party service provider who provides services or support to us for the establishment, management, operation and maintenance of the services, or for the operation of the Company's business generally, including information technology services, telecommunications services, data processing or hosting and

storage (including but not limited cloud services), market research, survey and data analysis, and administrative services;

- (c) any business partners with whom the Company has made joint promotion or other cooperative arrangements (please see the section “Use of Personal Data in Direct Marketing” below);
- (d) 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;
- (e) any person who owes a duty of confidentiality to any Group member (e.g. professional advisers of the Group); and

Our agent, contractor and/or third party services provider are under a duty of confidentiality to use your personal data in connection with the purposes specified above, and not for their own purposes (including direct marketing).

### **Use of Your Personal Data in Direct Marketing**

The Company is allowed to use your personal data in direct marketing only if you consent or do not object.

In connection with direct marketing, the Company intends:

- i. to use your name, contact details, customer profiling and service portfolio information (including information on billing) 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. broadband and other telecommunication services and related products and services (including after-sales and maintenance services);
  - b. offer, news, activities and events to the customer organized or promoted by the Company;
  - c. gas supply and related products, facilities and services (including after sales and maintenance services);
  - d. household gadgets, cookware, kitchenware, appliances and furnishings;
  - e. restaurants, food and beverages;
  - f. personal of household insurance products and services;
  - g. 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);

- h. environmentally friendly and healthy products;
- i. lifestyle products; and
- j. donations and contributions for charitable and/or non-profit marketing purposes.

**If you do NOT wish the Company to use your personal data in direct marketing, you may exercise your opt-out right.**

You may opt out at the time you registered for the Company's services. You may also write to the Company's Data Protection Officer at the address below or send to [webmaster@tongas.com](mailto:webmaster@tongas.com) or call the Company at 2880 6988 stating your account number and other necessary particulars to opt out from direct marketing at any time. The Company will then cease to use your personal data in direct marketing. Processing of such request is free of charge.

### **Use of cookies**

We may use cookies to store and track information about you and your use of our website and the GOez. Please note the following matters regarding cookies:

- (a) cookies are text files placed in your computer or mobile device Internet browser to collect and store information about you. We use cookies on our website and the GOez to collect information about you when you browse or use our website or the GOez. We may also use related tracking technologies to collect usage information. The information collected may include information of your computer, mobile device, browser details, IP address, and your preferences and habits on language, page layout and other matters. The information collected does not contain personally identifiable information about you (such as your name or contact details). We collect, analyse and use the information collected to maintain, manage and enhance customers experience;
- (b) we may share the information collected by us with third party research agencies for research and analysis to enable us to enhance services and the customers experience. No personally identifiable information about you will be shared with these third party research agencies; and
- (c) most browsers are initially set up to accept cookies. You can choose not to accept cookies by changing the setting of your computer or mobile device but you may find that certain features on our website or the GOez may not work properly.

## **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

Towngas Telecommunications Fixed Network Limited

13/F, 363 Java Road, North Point, Hong Kong.

In order to enable us to process data access or data correction request, you have to provide information to verify your identity and your right to access or correct the relevant personal data. 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.

## **Changes to this Privacy Policy**

The Company reserves the right to update this Privacy Policy from time to time. When we do, we will post such update in our website and/or mobile applications and/or send you an e-mail to notify you of the same. Your continued use of the Services after such notice constitutes your consent to any changes. We encourage all users to periodically review this Privacy Policy for the latest information on our privacy practices.



(If there is any inconsistency or conflict between the English version and Chinese version of this Statement, the English version shall prevail.)

**Towngas Telecommunications Fixed Network Limited**