

Customer Data (Privacy) Policy

On this page, "Data User" refers to IFC Development Ltd, its subsidiaries, holding company (and subsidiaries of its holding company). Sun Hung Kai Properties Limited and Henderson Land Development Co. Ltd. are collectively referred to as "we" or "Our Group" as one "Data User".

Privacy Policy Statement

It is the policy of the Data User to comply with the requirements of the Personal Data (Privacy) Ordinance, Chapter 486 of the laws of the Hong Kong SAR ("Ordinance"). In doing so, we will ensure compliance by our staff with the strictest standards of security and confidentiality.

Our Group safeguard all information provided by our Customers and web site Users ("Users"). We do not collect any personally identifiable information from Users during their browsing of our web sites. When Users visit our web sites we record their visit only as a 'hit' and do not collect any Personal Data from them. We will however make a record of their visit that shows only the Domain Name Server address, part of their e-mail address, and of the pages visited. We use such information only for preparing general statistics on the usage of our web sites.

If Personal Data are collected in the process of making enquires or submitting applications for services provided by different operations within our Group, Users will be informed via the <u>Personal Information Collection Statement</u> of our web sites of such purposes and uses, including the extent of their transfer and disclosure; and the right of access to and correction of the collected Personal Data.

In order for us to provide Users with customizable and personalized services, we use 'cookies' to store and sometimes track information about Users. The information collected by means of 'cookies' includes Users' login name and his or her navigation pattern. This is done without Users being aware that it is occurring. Generally, we use 'cookies' to estimate our audience size; to track Users' progress and number of entries in our promotional activities; to assist merchants in tracking visits to, and business at, their stores, and to measure Users' traffic patterns. Personal Data collected by means of 'cookies' will not be disclosed to any third parties except to those parties within our Group.

Once we have obtained User's Personal Data, it will be maintained securely in our system. We shall retain Users' Personal Data for so long as he or she is a registered user of our web sites. Only the authorized staff, who have been properly trained, will be permitted access to such Personal Data, and we shall not release such Personal Data to any external parties except those parties set out in our <u>Personal Information Collection Statement</u> without User's agreement.

We may from time to time send direct marketing materials promoting products and services to Users based on their Personal Data. Suitable opt-out facilities will be provided during the direct marketing process.

We shall make our best endeavours to ensure that the privacy of Users is properly protected. However, given the nature of the Internet, we cannot guarantee that there is "perfect security".

In order to provide users with more information and services, we use third party content providers and service providers, and provide links to other web sites. These third parties may collect Users' Personal Data when users make use of their services. These third parties adhere to their own privacy policies and practices and our Privacy Policy Statement does not cover such third party practices.

Should Users have any queries about our privacy policy and practice, please write via e-mail to our Data Protection Officer at dpo@shkp.com or via mail to 45/F Sun Hung Kai Centre, 30 Harbour Road, Wan Chai, Hong Kong.

Personal Information Collection Statement

The Data User, in complying with the requirements of the Personal Data (Privacy) Ordinance, Chapter 486 of the laws of the Hong Kong SAR, is committed to safeguarding your privacy on-line, and notify you of certain matters when collecting information from you. This statement may change from time to time, so please check back periodically. By subscription and every time you log-in to this web site to use our services, you agree to be bound by this statement at that time in force.

Collection of Data

At the time of subscription and at other times when using this web site, you may be asked to provide us with personally identifiable information, such as your name and e-mail address. It is necessary for us to collect your information for providing you with the various services and activities offered on this web site. You are not obliged to supply the data here but if you fail to provide the information requested, we will not be able to provide you with the services and activities available on this web site.

Purpose and Use of Data

The information we collected will be used for the following purposes:

- 1. to monitor use of this web site and to help its further development;
- 2. to compile aggregate statistics about our users and to analyze site usage;
- 3. to collect data for identity verification and records and to maintain contact lists for correspondence;
- 4. to operate internal control, resolve disputes, troubleshoot problems and enforce our terms of use;
- to deliver information to you that we believe you may have interest in, such as targeted banners, new services and products and other promotions and marketing materials;
- 6. to contact you regarding administrative notices and communications relevant to your use of this web site and to respond to your request.

We may also use your information to match user information with third party data (i.e. to compare two sets of personal data collected for different purposes). By subscribing to this web site or by logging-in, you consent to carry out this matching procedure when we deem it is necessary in order to provide our services.

In addition, we will also use your information in the following manner:

- 1. We will share much of our data, including your information, with any member within Our Group.
- 2. In order to provide you with more information and services, we have arranged content providers and service providers to provide information and services. It may be necessary for us to share your information with these content providers and service providers.

If we add new features or services that might require the sharing of your personal information with an additional advertiser or sponsor, we will provide you with notice and the opportunity to opt-out to receive these offers.

Transfer of Data

Your information will not generally be disclosed or transferred to any other party in a form that would identify you except in the following circumstances:

- If we use third party suppliers or service providers to facilitate our services, we will have to provide your information to these suppliers or service providers offering such services where you choose to use these services.
- 2. We may disclose or access account information when we believe in good faith that the law requires it.
- We may also disclose or access account information for administrative and other purposes that we deem necessary to maintain, service, and improve our services.

In addition, your information will be accessed by, disclosed or transferred to any person or bodies corporate or division within Our Group for such purpose as we consider appropriate.

As the parties mentioned above may have places of business outside Hong Kong, your information may be transferred out of Hong Kong. By subscribing to our web sites or by logging-in, you agree to us transferring your information to these parties outside Hong Kong. These parties adhere to their own privacy customs and policies and we have no control over their use of your information. Therefore, we are not liable to their use of your information.

Please also see our <u>Privacy Policy Statement</u> which sets out our general policy and practices in respect of our collection and use of your data.

Access to Data

You have the right to request access to, and correction of, information about you held by us, by paying us the reasonable charges incurred by us in relation to administering and complying with your request. If you need to check whether we hold your personal information or if you wish to have access to, correct any information relating to you which is inaccurate, please write via e-mail to our Data Protection Officer at dpo@shkp.com or via mail to 45/F Sun Hung Kai Centre, 30 Harbour Road, Wan Chai, Hong Kong.