

# HKT TRUST

(A TRUST CONSTITUTED ON 7 NOVEMBER 2011 UNDER THE LAWS OF HONG KONG AND MANAGED  
BY HKT MANAGEMENT LIMITED)

and

# HKT LIMITED

(INCORPORATED IN THE CAYMAN ISLANDS WITH LIMITED LIABILITY) (STOCK CODE: 6823)

# PRIVACY STATEMENT

## COPYRIGHT STATEMENT

All HKT (as defined in the main body of this Privacy Statement) material, including publicly available website content and information (including text, images, graphics and videos), corporate policies and other documents (collectively, the “**HKT Materials**”), unless otherwise stated, is the property of PCCW-HKT DataCom Services Limited. The HKT Materials are protected by copyright (including the Copyright Ordinance, Cap.528 of the laws of the Special Administrative Region of Hong Kong (“**Hong Kong**”), the People’s Republic of China (the “**PRC**”)) and other applicable intellectual property laws. Information received through the HKT Materials may be displayed, reformatted, and printed for your personal and non-commercial use only. Otherwise, you may have to obtain the prior written consent of PCCW-HKT DataCom Services Limited.

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## I. Privacy Statement

This Privacy Statement sets out how HKT Limited (“**HKT**”) and its subsidiaries, affiliates and associated companies *but excludes adoption to eSmartHealth Limited<sup>1</sup>, Club HKT Limited<sup>2</sup> and The Club Travel Services Limited<sup>3</sup> and PCCW Global Limited<sup>4</sup>* (collectively, “**HKT Group**”, “**we**”, “**us**” or “**our**”; and each a “**Group Entity**”) collect, use, manage and protect the personal data as defined in the Personal Data (Privacy) Ordinance (Cap. 486 of the Laws of Hong Kong) (the “**PDPO**”) or similar terminology under other applicable data protection laws (“**Data**”) (the PDPO and other applicable data protection laws, collectively, the “**Data Protection Laws**”) that we may collect from or about you. It applies to all living individuals whose Data may be handled, whether as data user (as defined in the PDPO) or data processor (as defined in the PDPO), by the HKT Group.

HKT Group includes, but not limited to:

<b><u>Company Name</u></b>	<b><u>Name(s) of operating business(es) (if any)</u></b>
CSL Mobile Limited	1010, Club SIM, csl
HKT	/
HKT Advance Limited	HKT Advance
HKT CSP Limited	MyHKT
HKT Education Limited	HKT education
HKT Financial Services (IA) Limited	Club Care, HKT Care
HKT Openpay Limited	GoWallet
HKT Payment Limited	Tap & Go
Hong Kong Telecommunications (HKT) Limited	eye, HKT Business Broadband, HKT Enterprise Solutions, HKT Fixed Line, HKT Home Phone, HKT Merchant Services, HKT Smart Living, HKT SME, HKT Smart Warranty, IDD 0060, LiKE100, NETVIGATOR, Star Home Call, uHub plus, one communications services
Now TV Limited	Hong Kong Yellow Pages, Now TV, Now E, ypTrade, ypShop

<sup>1</sup> For the privacy statement of eSmartHealth Limited (running and operating DrGo), please refer to <http://www.esmarthealth.com/en/privacyPolicy.html>.

<sup>2</sup> For the privacy statement of Club HKT Limited (running and operating The Club, Club Shopping, Club Like and Club Hope), please refer to <https://www.theclub.com.hk/en/privacy-policy.html>.

<sup>3</sup> For the privacy statement of The Club Travel Services Limited (running and operating Club Travel), please refer to <https://www.clubtravel.com.hk/en/privacy-statement.html>.

<sup>4</sup> For the privacy statement of PCCW Global Limited, please refer to <https://www.consoleconnect.com/privacy-statement>.

In the event a Group Entity has its privacy statement (the “**Entity Privacy Statement**”), please refer to the relevant privacy statement on how it uses your Data. In case there is any conflict between the Entity Privacy Statement and this Privacy Statement, the Entity Privacy Statement shall prevail.

## **II. Protecting Your Privacy**

This Privacy Statement (a) reflects our commitment to Data protection and to handle and process your Data in a transparent and secure manner, and (b) sets out how your Data is being handled, your rights and how you can contact us.

Before collecting and processing your Data for the purposes as set out hereunder, we may be required by the applicable Data Protection Laws to obtain your written consent (directly or indirectly), and in such cases, only with such written consent (directly or indirectly), may we use your Data in the manner as specified hereunder.

## **III. Collection of Your Data**

### **1. What Types of Data We Collect**

We may collect, process and hold a range of different Data about you such as, but not limited to:

- a. personal particulars including name, date of birth, age, gender, ethnicity and nationality;
- b. contact details including address, telephone number, mobile phone number and/or email address;
- c. identification information including, details on your identification documentation such as Hong Kong Identity Card, passport, student card, staff card, driver’s licence, any other personal identifiers and biometric information including fingerprints and speech patterns;
- d. Data that you have shared with third party social media platform operators including account login name, profile picture and contact details;
- e. transactional information and payment details including credit card, debit card and other electronic banking, digital wallet or payment facility Data;
- f. account details or Data relating to the goods and services offered by us (the “**Services**”) registered with us including PIN, username, password, account numbers and service numbers;
- g. device specific information including cookies, browser type, operating system, IP address, connection data, hardware model, operating system, version, unique device identifier, serial numbers, setting configurations and software and mobile network configuration;
- h. information about how you use our Services including network usage and your location when you are using our Services, as well as call recordings, chat history and any other form of communication;
- i. health and biometric information which could be provided to us when you use our health and wellbeing related services;
- j. credit and service history information to enable us to assess your eligibility for our offers of Services or to accommodate your request for transfer of Services or your account with us;

- k. blockchain data including wallet addresses, public keys and transaction information;
- l. website, mobile application and TV application usage data including user agent, domain name, referral URLs, location, phone contacts, browser and search history, online activities and statistics, log data, device and software characteristics and configurations;
- m. employment information including education, profession, salary range, previous employment details, marital status, family and household information;
- n. behavioural information including hobbies, preferences and leisure activities;
- o. all Data requested by applicable government authorities, courts, law enforcement or other authorities or regulatory bodies to enable us to comply with or in connection with any law, rule, regulation, judgment or court order (whether within or outside of Hong Kong); and
- p. any other Data as may be required by any members of HKT and/or their respective contractors, sub-contractors, intermediaries, agents, business partners or representatives, brokers, underwriters from time to time and which is necessary for the provision of the Services.

Where possible, we will indicate during Data collection whether specific Data is mandatory for us to enter into a contract with you or provide the Services to you. Failure to provide Data that is indicated as mandatory will prevent us from providing those particular Services to you.

## 2. How We Use Cookies

Some of our websites and/or mobile applications use cookies or similar tracking tools on your computer, mobile phones or device for us to, for example, personalise your user experience and/or maintain your identity across multiple webpages and/or Internet sessions (the “**Tracking Data**”). The Tracking Data may include, but is not limited to, relevant login and authentication details as well as information about your activities and the preference configurations on your device and across our websites and mobile and TV applications.

For details on how we use cookies, please refer to our Cookies Policy.

## 3. How We Collect Your Data

We collect your Data in several ways, including without limitation:

- a. you directly (i) provide the Data by phone, customer service hotlines, online chat sessions or via email; (ii) complete a registration/application form and/or other relevant forms, documents or any other means (including but not limited to, if/where applicable, at or during our functions, events, campaigns, activities or the like); (iii) submit your Data through our websites, mobile or TV applications; (iv) contact us with a query or request; (v) provide during the ordinary course of the continuation of our business relationship with you; or (vi) provide the Data when we are legally required to do so;
- b. third parties such as related entities, business partners, other customers, or your representatives with appropriate consent from you;

- c. publicly available sources;
- d. our own records of how you use our Services;
- e. your visits on our websites, or mobile or TV applications, including but not limited to the Tracking Data; and/or
- f. your participation in surveys or marketing promotions organised by us or on our behalf, solely or in conjunction with Group Entities or any third parties.

Occasionally, you may need to provide Data about other individuals (e.g. “Users” as defined in our Mobile Service Agreement) to us. If so, you should obtain those individuals’ authorisation and/or consent to such use, disclosure and transfer (or the extent to which such authorisation and/or consent was obtained). You should also advise them where they can find a copy of this Privacy Statement and the relevant PICS and to contact us for further information as stated under the “How to Contact Us” section below.

#### **IV. Use of Your Data**

##### **1. How We Use Your Data**

We may collect, retain and use your Data for the following purposes:

- a. Services Administration
  - (i) to verify your identity and facilitate your user account/profile creation, including but not limited to handling and processing your instructions, complaints and requests related to the above;
  - (ii) to verify your eligibility for our offers of Services, games and/or promotions or other events;
  - (iii) to process your application to subscribe to our Services and loyalty programmes; to provide, activate and/or renew Services, loyalty programmes and My HKT that you may have subscribed for, including but not limited to handling and processing your instructions, complaints and requests related to the above;
  - (iv) to process any payment instructions, direct debit facilities and/or credit facilities in relation to our supply of Services to you, including but not limited to handling and processing your instructions, complaints and requests related to the above;
- b. Optimisation, Personalisation and Marketing
  - (i) to provide you with rewards, promotional benefits, updates, offers and invitation to events;
  - (ii) to promote and market our Services to you through different means, including but not limited to the use of machine learning and/or artificial intelligence tools and/or models (collectively, the “AI”);
  - (iii) to perform research or analyses so that we may improve and optimise the Services and/or loyalty programmes that can be made available to you, such as through AI;

- (iv) to conduct surveys and marketing, promotional, behavioural scoring for business operations and/or planning purposes, such as through the use of AI;
- (v) to carry out behavioural, market and product analyses for profiling, generating statistical or actuarial reports (containing aggregated data that does not relate to any identified or identifiable individual), information management and database administration;
- (vi) to maintain, enhance and develop our products and service offerings through different means, including but not limited to the use of AI;
- (vii) to develop various services and products through different means, including but not limited to the use of AI;
- (viii) to distribute our publications and research materials as well as those of our business partners and counterparties;
- (ix) to maintain and develop our systems and infrastructure, including testing and upgrading of these systems;

c. Legal and Administration

- (i) to conduct credit checks and detect fraudulent activities in compliance with the Anti-Money Laundering and Counter-Terrorist Financing (Financial Institutions) Ordinance (Cap. 615 of the laws of Hong Kong) and in relation to other compliance purposes;
- (ii) to enforce our contractual rights and statutory rights;
- (iii) to comply with our telecommunications licence(s) obligations in respect of interconnection arrangements with other telecommunications operators and related industry practices;
- (iv) to evaluate your financial needs and insurance claims made by or against you, and to process claims involving you (including but not limited to making, defending, analysing, investigating, processing, assessing, determining, responding to, resolving or settling such claims); and
- (v) to comply with applicable laws in or outside Hong Kong as may be required by applicable government authorities, courts, law enforcement, or regulatory or investigation bodies, in relation to the supply of Services and/or loyalty programmes to you, including to assist in the prevention, detection of crime or possible criminal activities.

## 2. How We Share and Disclose Your Data

Your Data will be held by one or more Group Entity and will be accessible by employees of such Group Entity consistent with the situations or for the purposes set out in this Privacy Statement or as otherwise indicated by prior notice to you or, where required, by obtaining your consent.

To provide the Services that you have requested, we may, to the extent permissible under applicable laws and regulations, disclose or make available your Data to organisations or parties outside of HKT Group (which may be within or outside of Hong Kong) (collectively, the **“Organisations”**) to use, disclose, process or retain for the purposes mentioned above and any other purposes indicated in this paragraph below:

- a. HKT Group including our affiliates, overseas offices, assignees, transferees and representatives (including any actual or proposed participant, assignee or transferee of all or any part of our business or operations);
- b. eSmartHealth Limited, Club HKT Limited, The Club Travel Services Limited and PCCW Global Limited;
- c. Those subsidiaries, affiliates, associated companies of PCCW Limited, their aforesaid respective affiliates, overseas offices, assignees, transferees and representatives (including any actual or proposed participant, assignee or transferee of all or any part of its business or operations) but exclude those entities under Section IV(2)(a) and (b) above (the “**PCCW Group**”);
- d. Business partners including without limitation Organisations providing administrative services; legal and compliance advisory services; operational and customer support services; process management services; banking, charge and credit card issuance, payment processing, transactions and financial services; telecommunications network operations services; mailing, courier, delivery, logistics and warehouse services; billing services; information technology services; cloud storage services; maintenance, installation and repair services; analytics, customisation, research, marketing and advertising services; business and corporate strategy services; reward, loyalty and privileges programme providers and benefits redemption services; insurance, underwriting and insurance brokerage services; blockchain services; AI services; transfer, sale merger and acquisition services (including but not limited to the relevant transferees and/or purchasers of a company and/or the business); investment and funding services; external services providers (including but not limited to telemarketing and direct sales agents, call centres, data processing companies) engaged by us for the purposes set out in Section IV(1); as well as agencies providing debt collection services, account management services, collection and security services, credit-reporting, fraud-checking and loss prevention services;
- e. Government and regulatory authorities and other organisations, as required or authorised by law;
- f. Professional advisors including our/ your authorised agents, representatives, accountant, auditors, insurers and/or legal advisors; and
- g. Charitable or non-profit organisations, as required for fulfilment of our contractual obligations.

We take the required steps to ensure that the Organisations involved in these circumstances are bound by appropriate confidentiality and obligations under the Data Protection Laws in relation to the protection of your Data and that they use your Data for the sole purpose of carrying out the services for which they have been engaged, and not for their own or other purposes (including direct marketing).

### 3. Direct Marketing (If Applicable)

We may, in compliance with applicable Data Protection Laws, and, where applicable, with your consent use your Data (including without limitation name, contact information, phone number, residential/office address and email address and information about the Services you have purchased but except health and biometric information ), for us, PCCW Group and our respective dealers, suppliers, licensors, providers and/or business partners (collectively, the “**Service Providers**”) to provide you with direct marketing content (pursuant to which we may or may not receive remuneration in return), including



sending to you notices and/or updates about gifts, discounts, privileged offers, benefits and promotions related to Services offered by us and/or the Service Providers, including without limitation: TV, telecommunications, over-the-top (OTT) services, content services, mobile voice, SMS and data communications, IDD/roaming, Internet connectivity, cloud services, electronic/mobile payment, entertainment, secretarial services, personal assistant services and information services (such as weather, finance and news information), device accessories, mobile applications and software, computer peripheral, accessories and software (including notebooks, handsets, mobile devices and accessories, keyboards, security installations and mobile applications), reward, loyalty and privilege programmes, lifestyle, networking events, travelling, banking, alcohol, sports, music, gaming, transportation, household products, food and beverages, finance, stored value facilities, electronic wallets, cryptocurrencies, digital assets, insurance, wealth and asset management services and products, pensions, investments, brokering, financial advisory, credit and other financial services and products, education, health and wellness, beauty products and services, fashion and accessories, electronics, social networking, technology, e-commerce, digital assets and related offerings and services, logistics, retail, home and décor, media and high-end consumer products and services, shopping malls and outlets, property developments, public services, utility services, donations and contributions for charitable and/or non-profit making purposes.

We may carry out direct marketing through a variety of ways (such as in the form of a letter, bill insert/message, email, digital SMS, MMS, instant message, app push notification, targeted TV message, broadcast message on eye device, by telephone, social media or advertisements on websites or other means). We will honour your request to not using your Data for the purposes of direct marketing and/or provide your Data to third parties (whether to the Organisations and/or the Service Providers) for their direct marketing purposes. You may opt-out, free of charge, from receiving direct marketing material and/or communications from the relevant Services or you may request that we cease to provide your Data to third parties, which we will cease to do so. At the same time, you may resume receiving the same (if you have previously opted-out of receiving such material and/or communications from the relevant Services) by making a written request to our Group Data Protection Officer together with your registered name and service account number, registered telephone number or login name (as applicable).

## **V. Export of Data**

At times it may be necessary and/or prudent for us to transfer your Data to other jurisdictions outside Hong Kong in which the Data was initially located, for the prevention, detection or investigation of crime or for storage, processing and other purposes for which the Data was collected.

In the event that we do transfer your Data cross-border, appropriate safeguards will be put in place in compliance with the prevailing requirements of applicable Data Protection Laws. If you are not a resident in Hong Kong, you may contact us under Section X for further information about the recipients (if any) of your Data outside Hong Kong.



**VI. Safety of Your Data**

All required efforts are made to ensure that any Data held by us is stored in a secure and safe place and is accessible only by our authorised employees or other Organisations.

When we pass your Data to third party Organisations for them to process, we seek to ensure that they have appropriate security measures in place to keep your Data safe and to comply with this Privacy Statement and the applicable Data Protection Laws.

**VII. Retention of Your Data**

We will retain your Data in accordance with our internal policies. Your Data will only be retained for as long as we need it for the purposes as stated in this Privacy Statement (and directly related purposes) unless the Data is also retained to satisfy any applicable statutory, regulatory or contractual obligations or for the purpose of investigation, detection and prosecution of crime. Once your Data is determined to get erased, your Data is securely purged from our electronic, manual and other filing systems based on the above criteria and our internal procedures.

**VIII. Third Party Websites and/or Mobile and TV Applications**

Our websites (including but not limited to [www.hkt.com](http://www.hkt.com), <https://www.hktchina.com>, [www.1010.com.hk](http://www.1010.com.hk), [www.hkcs1.com](http://www.hkcs1.com), [www.netvigator.com](http://www.netvigator.com), [www.hkt-eye.com](http://www.hkt-eye.com), [www.nowtv.now.com](http://www.nowtv.now.com), [www.nowe.com](http://www.nowe.com), [www.yip.com.hk](http://www.yip.com.hk), [www.yiptrade.com](http://www.yiptrade.com), [www.yipshop.com.hk](http://www.yipshop.com.hk), [www.uhub.com](http://www.uhub.com), <https://smartliving.hkt.com>, [www.hkt-starhomecall.com](http://www.hkt-starhomecall.com), [www.hkteducation.com](http://www.hkteducation.com), [www.hktfinancialservices.com](http://www.hktfinancialservices.com), [www.hktmerchantservices.com](http://www.hktmerchantservices.com), [www.tapngo.com.hk](http://www.tapngo.com.hk), [www.hktflexi.com](http://www.hktflexi.com), <https://www.hktia.com.hk/>, <https://clubcare.theclub.com.hk>, <https://gowallet.com.hk>, [www.clubsim.com.hk](http://www.clubsim.com.hk), [www.cs.hkt.com](http://www.cs.hkt.com), [www.biznetvigator.com](http://www.biznetvigator.com), <https://www.hkt-sme.com> and <https://www.hkt-enterprise.com>) and mobile and TV applications (if any) may contain links to other websites, webpages and mobile and TV applications operated by third parties (collectively, the “**Third Party Sites**”). You should be fully aware that the provisions of such Third Party Sites do not constitute an endorsement, approval, or any form of association by or with us. We have no control over the content of the Third Party Sites or the way their operators deals with your Data, and we are not responsible for the content of such Third Party Sites. You should review the privacy policy of such Third Party Sites to understand the ways in which your Data may be used by those third parties.

**IX. Your Rights**

We are committed to safeguarding your Data and ensuring that you may exercise your rights. In particular, you have the following rights:

- a. To request access to your Data that we hold. We may apply an administrative charge for providing you with access to your Data in response to such request;
- b. To request correction to your Data that we hold;
- c. To request us to stop using your Data for direct marketing; and
- d. To make a complaint to a data protection authority about how we are using your Data.

If you are a user of My HKT, you may exercise your right of access and correction by logging on to your My HKT account where you will be able to view and correct the Data held by us about you. If you are not a user of My HKT, you may write to our Group Data Protection Officer under Section X below.

If you wish to exercise any of your rights, or would like to enquire about these rights, you may contact us in the manner as set forth under Section X below.

You may decline to share Data with us and/or withdraw any consent which you may have provided, in which case, we may not be able to provide you with some of our Services.

#### **X. How to Contact Us**

For all issues and enquiries regarding our obligations and compliance under the applicable Data Protection Laws, and any request for access to, correction or deletion of your Data, please contact us in writing:

Group Data Protection Officer  
HKT Limited or the name of the appropriate Group Entity that collects your Data

Mailing address: GPO Box 9896, Hong Kong  
or  
email: [privacy@pccw.com](mailto:privacy@pccw.com)

You may also contact us to raise an issue regarding our handling of your Data.

#### **XI. Changes to this Privacy Statement**

This Privacy Statement may be amended from time to time and all handling of Data will be governed by the most recent version of this Privacy Statement, available on our website at [www.hkt.com/legal/privacy.html](http://www.hkt.com/legal/privacy.html).

#### **XII. Inconsistency or conflict**

If there is any inconsistency between the English and Chinese versions of the Privacy Statement, the English version will prevail.

**XIII. Miscellaneous**

Nothing in this Privacy Statement shall limit your rights under the PDPO.

This Privacy Statement shall be governed by, and construed in accordance with, the laws of Hong Kong.

Version Date: 12 November 2025.