

PRIVACY POLICY

The Dairy Farm Company, Limited 牛奶有限公司 trading as 7-Eleven ("**7-Eleven**" or "**we**" and "**us**" and "**our**" shall be construed accordingly) owns and operates 7-Eleven in Hong Kong and Macau. We recognise the importance of your privacy and maintaining the confidentiality of your personal information. This Privacy Policy applies to all products and services provided by us including but not limited to the 7-Eleven promotional website at [<https://www.711-topbrand.com/>] operated by us (the "**Website**") and sets out how we may collect, use and disclose your personal information. We pledge to comply with the requirements of the Personal Data (Privacy) Ordinance (Cap. 486) (the "**Ordinance**") in Hong Kong and the Law No.8/2005 dated 22 August 2005 (Personal Data Protection Act) in Macau (the "**Act**"). In doing so, we will ensure compliance by our team members with the strictest standards of security and confidentiality.

A. COLLECTION OF PERSONAL DATA

A.1 Your privacy is important to us and we have taken steps to ensure that we do not collect more information from you than is necessary for us to provide you with our products and/or services and/or to enable you to participate our activities (the "**Promotion**").

A.2 We may ask you to provide personal information when you use this Website. The personal data that we may ask you to supply includes, without limitation, your name and phone number (collectively the "**Personal Data**").

A.3 Please note that it is mandatory for you to provide certain categories of Personal Data (as specified at the time of collection). In the event that you do not provide any Personal Data marked as required, we may not be able to provide you with our products and/or services and/or allow you to participate the activities held by us.

B. USE AND DISCLOSURE OF PERSONAL DATA

B.1 If you provide any Personal Data to us, you authorise us to collect, retain and use Personal Data about you for the following purposes:

- (a) operating, processing, maintaining and/or managing your online account;
- (b) verifying your identity;
- (c) providing you with rewards or services, including participation of the activities, to be provided under the activities;
- (d) providing you with customer services and responding to your queries, feedback or claims;
- (e) providing you with results of winning of awards;
- (f) performing research or statistical analysis in order to improve our products and services and for marketing and promotional purposes;
- (g) providing Marketing Materials in accordance with B.4 below; and

(h) making such disclosures as may be required for any of the above purposes or as required by law or in respect of any feedback or claims made by you.

B.2 You further agree that we may disclose and transfer (whether in Hong Kong, Macau or abroad) your Personal Data to third party service providers engaged by us to provide (a) data entry services, (b) customer database management services, (c) management of the activities, (d) customer contact services and delivery of our products (and service providers may contact you regarding delivery, promotions, product rewards, vouchers, redemptions and customer services), and (e) secure data disposal services (collectively the "**Third Party Service Providers**"). The Third Party Service Providers are under a duty of confidentiality to us and are only permitted to use your Personal Data in connection with the purposes specified in B.1 above, but not for their own purposes (including direct marketing).

B.3 When necessary, we may also disclose and transfer (whether in Hong Kong, Macau or abroad) your Personal Data to our professional advisers, law enforcement agencies, insurers, government and regulatory and other organisations for purposes specified in B.1(h) above.

B.4 We may only use your name, phone number and email address with your consent or with your indication of no objection to provide marketing materials to you relating to the goods and services provided by (a) 7-Eleven; (b) other business units owned and operated by The Dairy Farm Company, Limited 牛奶有限公司 (including Wellcome, Market Place by Jasons, Market Place 3hreesixty, Oliver's The Delicatessen, San Miu Supermarket, Mannings, Mannings Plus, Mannings Baby, GNC and IKEA); and (c) 7-Eleven's partners. Such goods and services for each of the foregoing shall include the following classes: retail, cosmetics and beauty, health, personal care, toiletries and medical, baby care, maternity care, insurance, financial, music, sports, betting (lucky draw), dining, travel, transportation, banking, electronics, home, household, textile, telecommunication, food and beverage, grocery, office and business supplies, technology, outdoor, furniture, lighting, décor, media (including digital), e-commerce platform and facilitator (including online trading, payment and auctions), bill payment, gift card, prepayment card, subscription card, vending machine, ticketing, logistic hub (collection and pick up point), online games and publications (the "**Marketing Materials**").

B.5 We may share aggregate data that does not allow you to be identified with third parties for various purposes (including marketing and advertising), and may use this data in order to better understand your needs and to improve and adapt to our products and services.

B.6 Any Personal Data supplied by you will be retained by us and will be accessible by our employees, the Third Party Service Providers and third parties referred to in B.3 above, for or in relation to any of the purposes stated in B.1 herein.

B.7 We may permit individuals who are team members of 7-Eleven or other business units owned and operated by The Dairy Farm Company, Limited 牛奶有限公司 (including those stated above) (the "**Team Members**") to have access to your online account but such Team Members must at all times comply with all applicable codes of conduct and/or other relevant company policies of us and/or their relevant employer(s) when accessing your online account. Notwithstanding anything stated herein, in the event it is found that a Team Member misuses your online account in his/her capacity as a Team Member (including but not limited to using any confidential or other similar insider information to obtain an unfair advantage from any

promotions or offers offered by 7-Eleven), we may disclose or transfer the Personal Data provided by such Team Member to his/her employer(s) for investigation and/or disciplinary purposes.

C. CONFIDENTIALITY

C.1 Personal Data held by us relating to the visitors to the Website and/or your online account will be kept confidential in accordance with this Privacy Policy.

C.2 Any questions, comments, suggestions or information other than Personal Data sent or posted via the Website by visitors will be deemed voluntarily provided to us on a non-confidential and non-proprietary basis. We reserve the right to use, reproduce, disclose, transmit, publish, broadcast and/or post elsewhere such information freely, including passing it to any associated company for example, in connection with the development, manufacture and marketing of products and services and to meet customer needs.

D. SAFETY OF PERSONAL DATA

D.1 All reasonable efforts are made to ensure that any Personal Data held by us is stored in a secure and safe place, and accessed only by our authorised employees or authorised Third Party Service Providers.

D.2 You should be aware that no system is impenetrable and no information provided over apps or the internet can be guaranteed to be completely secure. Accordingly, we cannot guarantee the security of any information that you transmit to us or receive from us over the Website or the internet.

E. LINKS

The Website may contain links to other apps, websites and/or webpages which are operated by third parties. We have no control over the content of the linked apps, websites and/or webpages or the way in which the operators of those apps, websites and/or webpages deal with your Personal Data. You should review the privacy policy for those third party apps, website and/or webpages to understand the ways in which your Personal Data may be used by those third parties.

F. RIGHT TO ACCESS/CORRECT PERSONAL DATA

F.1 Under the Ordinance and the Act, you have the right of access to Personal Data held by us about you and to request correction, deletion and/or cessation of use of your Personal Data.

F.2 If you have any questions regarding this Privacy Policy or if you wish to access or correct, delete or request that we cease use or processing of your Personal Data, you may send your request in writing to the following address:

Personal Data Officer

7-Eleven

4/F FWD Tower,

Taikoo Place,

979 King's Road, Quarry Bay

Hong Kong

Email: personaldata@dairy-farm.com.hk

F.3 In accordance with the Ordinance and the Act, we reserve the right to charge you a reasonable fee for the processing of any data access request.

G. AMENDMENTS

We may amend or update this Privacy Policy from time to time without prior notice and your Personal Data collected shall be governed by our latest Privacy Policy, which shall be available in the Website.

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