



## **Hong Kong Pony Club Notice relating to the Personal Data (Privacy) Ordinance**

The Hong Kong Pony Club (the “Club”) is committed to ensuring the privacy and security of the personal data it holds. The Club 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.

### **Collection of Personal Data**

“Personal data” refers to any data which directly or indirectly identifies you as an individual, or is capable of doing so. The Club collects and uses personal data that we believe is necessary to conduct our business with you. The types of personal data we collect may include, but is not limited to:

- Contact information such as your name, email address, mailing address, telephone number, and fax number.
- 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, physical condition, riding experience, education background, and employment history.

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

### **Use of Personal Data**

Your personal data may be used for the following purposes:

- Carrying out the Club’s operations and provision of facilities and services.
- Conducting checks regarding eligibility for using the facilities and services applied for.
- For marketing, promotional and customer management purposes, such as sending you offers and promotions (please see further details in “Direct Marketing” below).
- Meeting the requirements to make disclosure under the Club’s rules or bye-laws relating to the Club’s operations and any law binding on the Club.
- Facilitating communications between you and the Club.

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

## **Direct Marketing**

The Club intends to use your personal data for direct marketing carried out by the Club (or by an agent on behalf of the Club). 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 Club intends to:

- Use your name, contact information and demographic information.
- Market or promote the following classes of facilities, services, support, and related events and activities offered or arranged by the Club:
  - the Club'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 Pony Club 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 Club will be kept confidential. However, we may disclose such data to or such data may become accessible or known to employees, agents, service providers and consultants of the Club who provide services to assist in fulfilling the purposes for which it was collected. Your personal data may also be provided to other riding centers for fulfilling the purposes for which it was collected (subject to any consent requirement relating to "Direct Marketing" above). Other disclosure of your personal data will only be undertaken after we have obtained your prescribed consent, or as may be required by law.

## **Links to Third Party Websites**

The Club's website may contain links to other sites and pages which are operated by third parties. 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 Club's website ("Website") and mobile apps, you agree that 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 Club uses cookies on its Website to track visitor preferences. These cookies allow the Website to remember information that changes the way the Website behaves or looks, such as your preferred language. These cookies can also assist you in changing text size, font and other parts of the Website 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 Website 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 Club 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.hongkongponyclub.com](http://www.hongkongponyclub.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 Club 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:

Hong Kong Pony Club  
c/o Tuen Mun Public Riding School  
Lot 45 Lung Mun Rd.,  
Tuen Mun, NT