

Privacy Policy Statement

Notice relating to the Personal Data (Privacy) Ordinance

The Jockey Club Kau Sai Chau Public Golf Course Limited (the “Golf Course”) is committed to ensuring the privacy and security of the Personal Data it holds. We 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

From time to time and for the purpose of carrying on the Golf Course’s business and operations, including the provision of services and facilities to you, you may be requested to supply data that may directly or indirectly identifies you or other person(s) as an individual (“Personal Data”) such as, but not limited to, the following:

- Your name;
- Contact information such as email address, mailing and residential address, telephone number and fax number;
- KSC ID and details (such as transactions conducted using your KSC ID);
- Information for verification of identity, including identification type and identification number (such as HKID or passport number), driving licence number and other related information;
- Information for verification of golf playing eligibility, including identification type and identification number (such as GHIN number and KSC Golf Pass number) and other related information;
- Billing information such as your credit card number, bank account information, and billing address;
- Demographic information such as age, gender, nationality, marital status, preferences, education background, professional qualifications and employment history.

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

Occasionally, you may need to provide Personal Data about other individuals to the Golf Course (e.g. spouse or children or guests). In that event, to comply with the Ordinance, you are required to have first obtained the authorisation of such individuals before using, disclosing and transferring their Personal Data, including giving consent on their behalf to the Golf Course’s possible use, disclosure and transfer of their Personal Data, for the purposes you would want to achieve from the Golf Course. If necessary, the Golf Course may require you to provide to the Golf Course any supporting documents which may be necessary to prove such authorisation. You should also advise them that the Golf Course can be contacted for further information.

Use of Personal Data

Your Personal Data may be used for the following purposes:-

1. Providing facilities, goods, services and support or performing transactions and administration work related to the operations of the Golf Course;
2. Processing of your application to subscribe to the Golf Course’s services and facilities;
3. Conducting checks regarding eligibility for using the facilities and services applied for;
4. Verifying your identity;

5. Matching (as defined in the Ordinance) your Personal Data with other data collected (by the Golf Course or third parties) for other purposes, in relation to, the provision of facilities, goods and services to you and/or the performance of any transaction and administration work related to the Golf Course's operations;
6. Marketing and advertising of any facilities, goods and services to you by the Golf Course, such as sending you offers and promotions (please see further details in "Direct Marketing" below);
7. Maintaining and developing the Golf Course's business systems and infrastructure, including testing and upgrading of these systems;
8. Meeting any obligations, requirements or arrangements, whether compulsory or voluntary, of the Golf Course, to comply with, or in connection with,
 - a) any law, regulation, judgment, court order, sanctions regime, within or outside the Hong Kong Special Administrative Region ("Hong Kong") existing currently and in the future;
 - b) any guidelines, guidance, demand or requests given or issued by any legal, regulatory, governmental, tax, law enforcement or other authorities within or outside Hong Kong; or
 - c) any of the Golf Course's rules or bye-laws relating to the Golf Course's operations.
9. Complying with any obligations, requirements, policies, procedures, measures or arrangements for sharing data and information of the Golf Course and/or any other use of data and information in accordance with any programs for compliance with sanctions or prevention or detection of money laundering, terrorist financing or other unlawful activities;
10. Prevention, detection or investigation of crime; and/or
11. Facilitating communications between you and the Golf Course.

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

Direct Marketing

The Golf Course intends to use your personal data for direct marketing carried out by the Golf Course (or by an agent on behalf of the Golf Course), and for such purposes your personal data held by the Golf Course may be provided to such agents for their use for direct marketing. 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 exempted by the Ordinance or we have received your consent.

For the above direct marketing use, the Golf Course intends to:

- use your name, contact information and demographic information; and
- market or promote the following classes of facilities, services, support, and related events and activities offered or arranged by the Golf Course itself or in conjunction with an agent on behalf of the Golf Course:
 - Golf Course facilities, services, training, instruction or tournament programmes;
 - Golf and related apparel, equipment or accessories;
 - Catering, hospitality and entertainment;
 - Golf-related ancillary services such as travel services and packages, insurance etc.
 - Charitable or non-profit making causes or events.

You can always opt-out free-of-charge by contacting the Golf Course's Personal Data Privacy Officer 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 Golf Course will be kept confidential. However, we may, where such disclosure is necessary to satisfy the purpose, or directly related purpose, for which the Personal Data was collected, provide such Personal Data to or such data may become accessible or known to the following parties:

1. employees, agents, service providers and consultants of the Golf Course who provide services (including but not limited to The Hong Kong Jockey Club and The Hong Kong Jockey Club Charities Trust) for fulfilling the purposes for which it was collected;
2. any person or company who is acting for or on behalf of the Golf Course or jointly with the Golf Course (including but not limited to The Hong Kong Jockey Club and The Hong Kong Jockey Club Charities Trust) in respect of the purpose or a directly related purpose for which the data was provided;
3. any other person or company who is under a duty of confidentiality to the Golf Course and has undertaken to keep such information confidential, provided such person or company has a legitimate right to such information;
4. the Golf Course's agents, contractors, suppliers and any third party service provider (including but not limited to The Hong Kong Jockey Club and The Hong Kong Jockey Club Charities Trust) who provides administrative, marketing and research, distribution, data processing, telemarketing, telecommunications, computer, accounting, payment or other services to the Golf Course in connection with the operations of its business;
5. government and regulatory authorities, investigative bodies and law enforcement agencies and other organisations, as required or authorised by law;
6. any financial institutions, including banks, necessary to establish and support the payment of any services and facilities provided to you; and
7. your authorised representatives or your legal advisers when requested by you to do so.

The Golf Course may also disclose your Personal Data to third parties: (i) when required by law, by court order or in response to a search warrant or other legally valid inquiry; or (ii) pursuant to the Golf Course's good faith belief that disclosure is required by law or otherwise necessary to the establishment of legal claims or defences, to obtain legal advice, to exercise and defend the Golf Course's legal rights or to protect the life, body or property of any individual. This also applies when the Golf Course has reason to believe that disclosing the Personal Data is necessary to identify, contact or bring legal action against someone who may be causing interference with the Golf Course's rights or properties, whether intentionally or otherwise, or when anyone else could be harmed by activities causing such interference.

The Golf Course may also transfer any information it holds about you as an asset in connection with a merger or sale (including transfers made as part of insolvency or bankruptcy proceedings) involving all or part of Golf Course or as part of a corporate reorganization or other change in corporate control.

The Personal Data that the Golf Course collects or obtains may be transferred to jurisdictions that offer lesser protection of personal data than that provided in your jurisdiction. By submitting Personal Data to the Golf Course or using any of the Golf Course's services and facilities, you understand and consent to such transfer.

Links to Third Party Website

The Golf Course's website may contain links to other sites and pages which are operated by third parties. The Golf Course 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 Golf Course's website ("Website"), you agree that the Golf Course can store and access cookies, IP addresses and use other methods in order to collect website usage data and improve your online 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 Golf Course 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

All Personal Data that has been collected from you will only be stored for a duration that is relevant to the purpose for which it was processed and for as long as required by applicable law.

Commitment to Data Security

The Golf Course is committed to protecting the security of your Personal Data. 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.kscgolf.org.hk 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 Golf Course about you and to correct such data. We may charge a reasonable fee for the processing of such data access requests.

You may direct your request in writing to:

Personal Data Privacy Officer
P.O. Box 88, Sai Kung Post Office
New Territories, Hong Kong

Or

privacy@kscgolf.org.hk

This notice is written in English language and may be translated into other languages. In the event of any inconsistency between the English version and the translated version of this notice, the English version shall prevail.

October 2021