

Privacy Policy Statement

Veterinary Specialty Hospital (“VSH”, “we”, “our” and “us”) respects your privacy and is committed to protecting the privacy, confidentiality and security of your personal data in accordance with the Personal Data (Privacy) Ordinance (Cap. 486 of the laws of Hong Kong) (“PDPO”). “Personal Data” means any data (a) relating directly or indirectly to you, (b) from which it is practicable for your identity to be directly or indirectly ascertained, and (c) in a form in which access to or processing of the data is practicable. This Privacy Policy Statement will inform you how we collect, use, disclose and secure information we obtain from your visit to our website (<https://www.vsh.com.hk/>) (the “Website”) and to our physical location at Veterinary Specialty Hospital, 1/F Lucky Centre, 165-171 Wan Chai Road, Wan Chai, Hong Kong, and tell you about your privacy rights and how the law protects you.

It is important that you read this Privacy Policy Statement together with any other policies we may provide on specific occasions when we collect or process Personal Data about you, so that you are fully aware of how we use information including Personal Data. This Privacy Policy Statement supplements other notices and policies and is not intended to override them.

By visiting the Website, you agree that you have read this Privacy Policy Statement and accept our privacy policies as set out below.

1. Our Contact Information

If you have any queries or suggestions regarding this Privacy Policy Statement, please leave a message in the “Contact Us” section of the Website.

You have the right to make a complaint at any time to the Privacy Commissioner for Personal Data of Hong Kong (the “Privacy Commissioner”), the statutory body overseeing the enforcement of Personal Data (Privacy) Ordinance in Hong Kong. We would, however, appreciate the chance to deal with your concerns before you approach the Privacy Commissioner, so please contact us first.

2. Collection of Personal Data

We collect Personal Data from you when you subscribe to our updates or newsletter, complete paper forms or electronic forms (including but not limited to Client Information Form, Veterinary Referral Form and job application form available on the Website), register our veterinary service, participate in any surveys or communicate with us by post, by email, by phone, by fax or via any social media platforms. When we collect your Personal Data by means of paper forms distributed at our physical location or electronic forms on the Website, you will be presented a Personal Information Collection Statement and may request a copy of this Privacy Policy Statement.

The Personal Data we collect from you is limited to your contact details, demographic information, such as your name, telephone number, email address and fax number, and/or your social media account (if you contact us via social media platforms). We also collect the

name, email address, curriculum vitae and cover letter of job applicants in the “Careers” section of the Website.

3. Collection of Visitor Data and Use of Cookies

We also collect other information, such as IP addresses and domain names, types and configurations of browsers, language settings, geo-locations, operating systems and time/durations and the web pages you visited on the Website (“**visitor data**”), by using server logs and other similar technology as you visit the Website. We use visitor data only for website enhancement and optimization purposes. We do not use, and have no intention to use, visitor data to personally identify anyone. Your visit to the Website would only be recorded as a “hit”.

We also use cookies, which are small computer files sent from the Website to your browser, to store your preferences and other information on your computer or mobile phone devices and enable us to display personalized content and advertisements (if any) on your later visits to the Website to give you the best browsing experience. If you continue browsing the Website without changing your cookie settings on the browser, we assume that you consent to our use of cookies on your device. You can change the settings of your browser to deactivate cookies but if you do so, you may lose certain features on the Website.

4. Surveillance Cameras

Our physical location is equipped with surveillance cameras for security reasons. Information obtained through surveillance cameras or surveillance systems will only be used in compliance with the requirements of PDPO and will not be kept for longer than is necessary.

5. Use of Personal Data

We use Personal Data collected from you to, without limitation, handle your enquiries, requests and/or complaints, manage your registration of our veterinary services, register your subscription to our updates or newsletter, process your job application, enhance your browsing experience on the Website, and/or improve our services (collectively, the “**Purposes**”).

We may use Personal Data to provide you with information or materials we think may be useful or relevant to you, information about our products and services, and our latest promotional information (“**marketing materials**”). When you submit your Personal Data, you will be presented a copy of the Personal Information Collection Statement and be allowed to indicate your consent or provide indication of no objection to receiving marketing materials from us. You may unsubscribe to our marketing materials via channels prescribed on the marketing materials after providing your consent or indication of no objection.

We may anonymize or aggregate information collected and use and disclose it for any purpose, provided that any Personal Data is anonymized to an extent that the identity of the data subject will not be identified, so that such information falls outside the scope of PDPO.

We may share Personal Data and other information with third-party contractors or service providers and professional advisors, to fulfil the Purposes, comply with legal obligations and protect and defend our rights and property. We do not rent, sell or share your Personal Data with other people or non-affiliated companies for their direct marketing purposes, unless we have your consent. We will use our commercially reasonable endeavours to ensure that third-party contractors or service providers and professional advisors engaged by us adopt a privacy policy that is no less restrictive than, if not the same as, this Privacy Policy Statement, and comply with PDPO or law that is substantially similar to, or serves the same purposes as, PDPO.

6. *Storage and Retention of Personal Data*

Your Personal Data will be stored safely and securely by VSH or any third-party contractors or service providers engaged by VSH. Your Personal Data may be transferred outside the territory of Hong Kong for storage, but we will use our commercially reasonable endeavours to ensure that the jurisdiction where Personal Data is stored has laws that are substantially similar to, or serve the same purposes as, PDPO. We will also use our commercially reasonable endeavours to ensure that third-party contractors or service providers adopt a privacy policy that is no less restrictive than, if not the same as, this Privacy Policy Statement and comply with PDPO.

We will also maintain a retention policy that complies with PDPO. We will take all practicable steps to ensure that Personal Data is not kept for longer than is necessary for the fulfilment of the Purposes. At any time prior to the termination of your relationship with us, you may request erasure or withdraw your consent by putting your request in the “Contact Us” section of the Website.

When we erase Personal Data, we erase by all practicable steps, including by contractual or other means, with appropriate methods of erasure. We will take all practicable steps to ensure that all copies of Personal Data held by us and processed by third-party contractors or service providers and our professional advisors will be erased. However, we are not required to comply with your erasure request if the erasure of Personal Data is prohibited by applicable laws or if it is in the public interest for such Personal Data not to be erased.

7. *Protection and Security of Personal Data*

We will take all practicable steps to ensure that all information collected by us is protected against unauthorized or accidental access, processing, erasure and/or use and in accordance with this Privacy Policy Statement. Subject to the actual circumstances, we may employ encryption technology when storing and transmitting Personal Data and other information collected by us. However, we cannot ensure or warrant the security of any information you provide to us. We do not accept liability for unintentional disclosure.

Unless your Personal Data is to be provided to third-party contractors or service providers, access to your Personal Data will be restricted to our employees, who are under strict

confidentiality obligations, are authorized and trained to handle Personal Data and have a need to know and use such Personal Data.

If we learn of a data breach from our system that is relevant to your Personal Data, we may attempt to, as soon as reasonably practicable, notify you electronically by posting a notice on the Website and/or sending an email to you.

8. Disclosure

We pledge to keep your Personal Data confidential. Unless specified in this Privacy Policy Statement or otherwise, we will not disclose your Personal Data to any third parties.

Pursuant to PDPO, we may disclose collected Personal Data, if we believe (a) doing so is required or appropriate to comply with law enforcement requests and legal process, such as a police warrant or court order, (b) there is reasonable grounds to believe that the publication of Personal Data is in the public interest, (c) it is necessary to identify an individual who is involved in a life-threatening situation and has to be administered with emergency rescue operations or relief services or (d) not doing so is likely to prejudice the prevention or detection of crime or the apprehension, prosecution or detention of offenders, or any other situations as provided by applicable laws. We cannot control how third-party contractors or service providers may disclose your Personal Data if they reasonably believe that disclosure is necessary for the purpose of preventing or detecting crime or is in the public interest.

9. Right to Access, Correct or Update Your Personal Data

Under the PDPO, you have the right to request access to and correction of Personal Data held by us about you. If you would like to request access to your Personal Data or request that we update or correct any Personal Data that you have provided to us, please put your request in the "Contact Us" section of the Website for the attention of our Chief Operating Officer.

We are entitled not to comply with your request of access if we believe that your Personal Data is held for the purposes of prevention or detection of crime, apprehension, prosecution or detention of offenders or any other situations as provided by applicable laws, and compliance with your request is likely to prejudice any of the aforesaid situations. We will provide you the reason(s) if your request of access or correction of Personal Data is refused.

10. Changes to Our Privacy Policy and to Your Personal Data

We keep this Privacy Policy Statement under regular review. We will post any adjustments to this Privacy Policy Statement on the Website, and the revised version will be effective when it is posted on the Website. The revised version in printed form will also be available at our physical location after the electronic version is posted on the Website.

It is important that all Personal Data we hold about you is accurate and current. Please keep us informed if your Personal Data changes during your relationship with us.

11. *Consequence of Failing to Provide Personal Data*

In the event that any Personal Data requested by us is not provided, VSH may be unable to contact you after completing paper or electronic forms or job application forms on the Website or at our physical location, and you will not be able to receive any information, materials, newsletters, or updates from VSH.

12. *Websites of Third Parties*

This Privacy Policy Statement does not apply to any other third parties (including any websites maintained by them). When you click on links on the Website that take you to either third parties' websites or websites of companies associated with us, you will be subject to the privacy policies of those parties. Whilst we support the protections of privacy on the Internet, we do not accept responsibility for any actions taken by third parties outside the Website.

13. *Personal Data of Minors*

We do not knowingly collect, hold, process or use Personal Data from minors under 18 years of age. If you learn that any minors has provided us Personal Data about them without parental consent, please alert us via the "Contact Us" section of the Website.

14. *Language*

This Privacy Policy Statement is written in the English language and may be translated into other languages including the Chinese language. In the event of any inconsistency between the English version and the translated version, the English version shall prevail.

Veterinary Specialty Hospital
February 2020