

Website Privacy Policy

Hong Kong Scottish Rugby Club Limited is committed to protecting the privacy, confidentiality and security of your personal data. Please read this Privacy Policy carefully so that you are aware of our views, practices and policies regarding the collection, use and disclosure of personal data we receive from users of the Site.

Owner and Data Controller

Hong Kong Scottish Rugby Club Limited ("us", "we", or "our") operates www.hongkongscottish.com (the "Site").

Address: 8/F, 72 Des Voeux Road West, Sheung Wan, Hong Kong

Contact email: info@hongkongscottish.com

This Site collects some personal data from its users. By submitting personal data to us, you agree to us using your personal data as follows.

Data Collection, Purpose and Use

While using our Site, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you. Personally identifiable information may include, but is not limited to name, email address, cookies, usage data, password.

We may use your personal information to -

- send you our weekly newsletters
- manage contacts and send messages
- ensure that content from our site is presented in the most effective manner for you and for your computer
- provide you with information, products or services that you request from us which may be of interest to you
- manage user database

In addition to the above, we may collect log data and use cookies.

Log Data

Like many site operators, we collect information that your browser sends whenever you visit our Site. This Log Data may include information such as your computer's Internet Protocol ("IP") address, browser type, browser version, the pages of our

Site that you visit, the time and date of your visit, the time spent on those pages and other statistics. In addition, we may use third party services such as Google Analytics that collect, monitor and analyse this data.

Cookies

Cookies are small pieces of information that are stored by your browser on your computer's hard drive. Like many websites, we use cookies to collect information, save the user's session and to carry out other activities that are strictly necessary for the operation of this Site, for example in relation to the distribution of traffic. We use cookies to save browsing preferences and to optimise your browsing experience. Some of third parties such as Google Analytics collect statistics in an anonymised and aggregated form and may not require the consent of the user or may be managed directly by us without the help of third parties. These may be used to track users' browsing habits – in addition to the information specified herein and without our knowledge.

The user can manage preferences for cookies directly from within their own browser and prevent, for example, third parties from installing cookies. Through browser preferences, it is also possible to delete cookies installed in the past, including the cookies that may have saved the initial consent for the installation of cookies by this website.

Data Storage

Your personal data may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Lawful Basis of Processing Personal Data

The contents of this Site are designed to comply with Hong Kong Law. We may process personal data relating to users if one of the following applies:

users have given their consent for one or more specific purposes;

• provision of data is necessary for the performance of an agreement with the user and/or for any pre-contractual obligations thereof;

 processing is necessary for compliance with a legal obligation to which we are subject;

Users under the age of 18 may register on the website to receive newsletters and other information, but only with parental or guardian consent. Users may only make purchases on this website if they are aged 18 or over or, if under 18, have parental or guardian consent.

Data Retention

We process and store your personal data for as long as required by the purpose is has been collected for.

Therefore:

- personal data collected for purposes related to the performance of a contract between us and the user will be retained until such contract has been fully performed;
- personal data collected for the purposes of our legitimate interests will be retained as long as needed to fulfil such purposes;
- we may be allowed to retain personal data for a longer period whenever the user has given consent to such processing, as long as such consent is not withdrawn;
- we may be obliged to retain personal data for a longer period whenever required to do so for the performance of a legal obligation or upon order of an authority.

Once the retention period expires, personal data will be deleted and some of your rights (i.e. the right to access, the right to erasure, the right to rectification and the right to data portability) cannot be enforced after expiration of the retention period. You may find specific information regarding your rights within the relevant section of this Privacy Policy or by contacting us at info@hongkongscottish.com

Third-party Disclosure

We do not sell, trade, or otherwise transfer to outside parties your personal information unless we provide users with advance notice. This does not include website hosting partners and other parties who assist us in operating our website, conducting our business, or serving our users, so long as those parties agree to keep this information confidential. We may also release information when its release is appropriate to comply with the law, enforce our site policies, or protect ours or others' rights, property or safety. However, non-personally identifiable visitor information may be provided to other parties for marketing, advertising, or other uses.

Your rights

Users have the right to do the following:

• Withdraw their consent at any time. Users have the right to withdraw consent where they have previously given their consent to the processing of their personal data.

• Object to processing of their data. Users have the right to object to the processing of their data if the processing is carried out on a legal basis other than consent.

• Access their data. Users have the right to learn if data is being processed by us, obtain disclosure regarding certain aspects of the processing and obtain a copy of the data undergoing processing.

• Verify and seek rectification. Users have the right to verify the accuracy of their data and ask for it to be updated or corrected.

• Restrict the processing of their data. Users have the right, under certain circumstances, to restrict the processing of their data. In this case, we will not process their data for any purpose other than storing it.

• Have their personal data deleted or otherwise removed. Users have the right, under certain circumstances, to obtain the erasure of their data from us.

• Receive their data and have it transferred to another controller. Users have the right to receive their data in a structured, commonly used and machine-readable format and, if technically feasible, to have it transmitted to another controller without any undue delay.

• Lodge a complaint. Users have the right to bring a claim before their competent data protection supervisory authority.

You can exercise your right to prevent such processing by contacting us at info@hongkongscottish.com

Security

The security of your personal information is important to us. Our website is scanned on a regular basis for security holes and known vulnerabilities in order to make your visit to our Site as safe as possible. Your personal information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems, and are required to keep the information confidential. We implement a variety of security measures when a user places an order enters, submits, or accesses their information to maintain the safety of your personal information. Unfortunately, no method of transmission over the internet is completely secure. While we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security.

Changes to this Privacy Policy

This Privacy Policy is effective from 01/08/2019 and will remain in effect except with respect to any changes in its provisions in the future, which will be in effect immediately after being posted on this page. We reserve the right to update or change our Privacy Policy at any time and you should check this Privacy Policy periodically. Your continued use of our Site after we post any modifications to the Privacy Policy on this page will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy. If we make any material changes to this Privacy Policy, we will notify you either through the email address you have provided us, or by placing a prominent notice on our website.

Contact Us

If you have any questions about this Privacy Policy, please contact us at info@hongkongscottish.com