

Privacy Policy

The Australian Chamber of Commerce in Hong Kong (AustCham) (CR No. 0195650) is committed to protecting your privacy and to ensuring that all personal data provided to us is handled in accordance with the relevant provisions of the Personal Data (Privacy) Ordinance (Cap. 486) (PDPO) and this policy. We are also committed to ensuring that all our employees, service providers and agents uphold their obligations.

All personal data collected by the Chamber is stored securely and may only be accessed by those with appropriate permissions. This privacy policy provides an overview of when and why we collect your personal data; how we use, process and manage your personal data, the conditions under which we might disclose your personal data to others and your rights regarding your personal data.

The legal basis we rely upon to process your personal data

1. Data protection laws set out various grounds on which a data user / organisation may lawfully collect and process your personal data. These include:
 - a) consent: we can collect and process your data with your consent. For example, we will rely on your consent when we are processing sensitive or special personal data, such as information relating to your health or religious beliefs. In many circumstances, if we rely on your consent as our legal basis for processing your personal data, you have the right to withdraw that consent at any time.
 - b) contractual obligations: in many circumstances, we require your personal data to comply with contractual obligations. For example, we collect your identity contact information when we accept you as a new member. If you are unable to provide such information to us, we may not be able to perform the contract we have with you or your organisation or enter into the contract with you or your organisation.
 - c) legal compliance: if the law requires us to, we may need to collect and process your personal data. For example, we may require your personal data to comply with anti-money laundering legislation or laws relating to the provision of legal services. If you are unable to provide such information to us, we may not be able to perform the contract we have with you or your organisation or enter into a contract with you or your organisation.
 - d) legitimate interests: in many situations, we require your personal data to pursue our legitimate interests in a way which might reasonably be expected as part of running our organisation, and which does not materially impact on your rights, freedoms or interests. For example, it may be in our legitimate interests to use your personal information for marketing purposes to assist us with providing our services to you.
 - e) Data protection laws vary across different jurisdictions. Please contact us if you require details of the specific legal ground we are relying on to process your personal data.

Why we collect, use and/or disclose personal data

1. AustCham will only use personal data collected from you for the purposes for which it was collected (or a directly related purpose), or in accordance with your requests or instructions.
2. AustCham may use your personal data for one or more of the following purposes including, but not limited to:
 - a) provision of services for continuing membership including:
 - to verify your identity when you are dealing with us as a member;
 - assist in facilitating your membership benefits, as defined by your membership level;
 - to determine your eligibility to attend and to facilitate any invitations to events, sponsorship offers or [training or educational] programmes;
 - provide updates on AustCham's network and provide information that we believe may benefit you or you have requested from AustCham through this Website or any other means (including enquiries, and provision of any related payment, identification, registration, billing);
 - administration;
 - management and communications purposes including surveys, feedback collection and research whether via mail, electronic mail, telephone, SMS, fax or online etc.
 - *to manage and resolve any legal or commercial complaints or issues;*
 - *to determine your compliance with the terms and conditions that apply to any of our memberships and applicable law;*
 - *to keep you informed about our activities, including by sending out newsletters or e-newsletters;]]*

How we collect personal data

We collect personal data about you in the following ways:

- where you register as a member or to receive emails from us
- when you submit a query or request to us
- when you respond to a survey that we run or fill in forms on one of our websites
- by tracking your use of our websites and mobile applications;
- from public sources
- from third parties who are entitled to disclose that information to us
- when you apply for a job with us.

In some cases we may be required by law to collect certain types of personal data about you.

Where we collect personal data from you, we will generally do so ourselves. However, in some cases we may collect personal data from a third party, such as through your representatives, contractors who provide services to us, or third parties who refer you to us because they think you may be interested in our products or services.

Kinds of personal data we collect, use, hold and disclose

1. The kinds of personal data and other information that we collect, use, hold and disclose about you may include, but not limited to :
 - your name;
 - job title;
 - date of birth
 - postal address
 - username / password
 - company information including company profile;
 - website details;
 - social media channels;
 - any logo(s) you use;
 - address details;
 - membership information;
 - contact details such as email, telephone and fax numbers;
 - credit card or other payment details; and
 - other information collected in your profile such as the event(s) or programmes you participated in or wish to participate in, the areas of interest you indicated, reviews, feedback and opinions and any other personal data you choose to provide to us etc.

2. Without this information, we may not be able to provide you with our services and opportunities, or to respond to queries or requests that you submit to us.

People to whom we may disclose personal data

1. AustCham may disclose or transfer such personal data where such disclosure is necessary to satisfy the purposes for which the data was collected (as set out above). We may share personal data about you with:
 - a) our staff who need the information to discharge their duties;

 - b) any third party service provider and any other person under a duty of confidentiality to AustCham including without limitation:
 - related entities within our corporate group
 - our business partners, agents and service providers
 - payment system operators and financial institutions
 - professional advisers who we engage to provide advice
 - all other agents and other organisations which have undertaken to keep such information confidential;

 - c) any person or entity to whom AustCham is under an obligation to make disclosure under laws or guidelines issued by regulatory or other authorities including government authorities; and

d) in accordance with your requests or instructions including persons you have authorised to interact with us on your behalf (such as your representatives and advisers).

e) In some cases, the people to whom we disclose your personal information may be located overseas. Further, we may have servers located overseas. The jurisdictions in which these people and/or servers are likely to be located include Australia, mainland China & Singapore. There may not be in place data protection laws which are substantially similar to or serve the same purposes as the applicable data privacy laws in Hong Kong. This means your personal information may not be protected to the same or similar level in Hong Kong.

f) AustCham will not share personal data with other members without consent.

Retention of personal data

1. Your personal data will only be kept as long as required for the purposes for which such personal data was collected, used and/or disclosed, or for any legal or business purposes.
2. We may retain your personal data for a period of at least 7 years. At our discretion, we may retain personal data for longer than the said period if we consider it necessary or desirable to do so to meet our legal or regulatory obligations.

Storage and security of personal data

We generally store the personal data that we collect in electronic databases, some of which may be held on our behalf by third party data storage providers. Sometimes we also keep hard copy records of this personal data in physical storage facilities. We use a range of physical and technical security processes and procedures to protect the confidentiality and security of the information that we hold, and we update these from time to time to address new and emerging security threats that you become aware of.

Access, correction and deletion of personal data

1. You provide your personal data to AustCham on a voluntary basis, except where we specify that it is mandatory to access certain services or opportunities.
2. In accordance with the PDPO, you may request access to your personal data held by AustCham. A reasonable charge may be imposed to cover the cost of photocopying personal data at the rate approved by the Secretary for Financial Services and Treasury.
3. You are also entitled to correct some aspects of your personal data held by AustCham, and request us to cease to use your personal data at any time without charge.
4. There may be cases where we are unable to provide the information you request, for example, where it would infringe other laws, interfere with the privacy of others, or result in a breach of confidentiality. In these cases we will let you know why we cannot comply

with your request.

5. If you are in an EU Member State, you have the right, subject to certain limitations or restrictions, under the data protection laws in the EU to:
 - a) request access to and rectification or erasure of your personal data;
 - b) obtain restriction of processing or to object to processing of your personal data; and
 - c) the right to data portability.

Individuals in the EU also have the right to lodge a complaint about the processing of their personal data with their local data protection authority.

6. Data access or correction requests should be addressed to us in writing to:

The Australian Chamber of Commerce in Hong Kong

Room 301-2 3F Lucky Building

39 Wellington St,

Central, Hong Kong

Ph: +852-2522-5054

E: austcham@austcham.com.hk

Direct marketing

1. We may from time to time use your personal data in order to send you marketing materials about goods, properties or services that we think you may be interested in (including in some cases services that are provided by a third party including other partners or organisations). We may not use your personal data unless we have received your consent.
2. Potential services you may receive marketing materials about include our events, programmes, research, volunteer opportunities, workshops, real estate, promotions, offers for sponsorship, networking, advocacy campaigns, opinion sharing, news updates, information and other related services or benefits.
3. You may opt out of receiving marketing communications at any time by following the unsubscribe instructions contained in the marketing communications or contacting AustCham at austcham@austcham.com.hk with your full name and contact details. We will then stop any further marketing related emails from ourselves. Please note that you may continue to receive communications for a short period after changing your preferences while our systems are fully updated.

4. If we use your personal data in any direct marketing communications, you have the right to request that we provide you with the source of that personal data. There is no fee for requesting this information. We will provide you with the source of the personal data, unless it is impracticable or unreasonable to do so.

Your consent

By using our website, providing personal data and/or using any of our products or services, you agree that:

- you consent to this privacy policy, as updated from time to time; and
- if you have provided personal data to us relating to any other person, you:
 - have a right to provide that information;
 - have provided a copy of this privacy policy, as updated from time to time, to that person; and
 - each such person has agreed to those terms.

Changes in the Privacy Policy

AustCham reserves the right to update, revise, modify or amend this Privacy Policy from time to time as AustCham deems necessary so please review it frequently. Changes and clarifications will take effect immediately upon their posting on the Website. If we make material changes to this Privacy Policy we will notify you here that it has been updated.

Complaints

We aim to implement high standards in order to protect your privacy. However, if you are concerned about the way in which we are managing your personal data and think we may have breached any applicable privacy laws, or any other relevant obligation, please contact our privacy compliance team using the contact details set out below. We will make a record of your complaint and refer it to our internal complaint resolution department for further investigation. We will deal with the matter as soon as we can, and keep you informed of the progress of our investigation.

Enquiries

Should you have any enquiries about AustCham's Privacy Policy and practices, please contact via telephone on +852-2522-5054 or via email austcham@austcham.com.hk

Analytics

Our website uses Google Analytics, a web analytics service provided by Google, Inc. (“Google”). Google Analytics uses cookies to help the website analyse how users use our website.

The information generated by the cookie about your use of our website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google’s behalf. Google will not associate your IP address with any other data held by Google.

You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of our website. By using our website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.