



Privacy Policy

Hong Kong Wing On Travel Service Limited (hereinafter referred to as “the Company”, “we”, “us” or “our”) respects the privacy and personal data of customers and is committed to the full implementation of data protection principles and regulations under the “Personal Data (Privacy) Ordinance”, Chapter 486 of the laws of Hong Kong Special Administrative Region, in its methods and guidelines regarding the collection, use, storage, disclosure, transfer, confidentiality and access of personal data, so as to protect the personal data provided by customers to us, and we ensure that our staff strictly comply with the relevant security and confidentiality standards at all times. To this end, the Company shall implement the following privacy policy principles:

Wing On Travel website, Wingontravel.com (hereinafter referred to as “the Website”) is a platform designed by the Company to provide online travel information to travelers. Any person who visits the Website agrees that he/she has read, understood and accepted the content of this privacy policy and agreed to be bound by it.

This Website will only collect personal data deemed relevant and useful for the Company to understand the travel needs of customers and to facilitate the Company’s handling of membership set up by customers through the Website and the Company’s operation-related business. The Website shall also use the personal data of customers to provide better customer service and products to customers. The Company will never sell such data to a third party for sales promotion or other purposes.

The Website will maintain strict confidentiality of the personal data of customers and website visitors. However, when a customer makes a booking for travel products or an inquiry through the Website, the Company will transfer the required personal data of the customer to the transportation company, hotel, hospitality company, insurance company or other third parties and their agencies or affiliates which must be informed with the relevant information, and this will be performed by law. Once the relevant data is submitted to the aforementioned organizations, the said data will be subject to the third-party privacy protection clause, and the Company shall not be responsible for the manner in which the aforementioned organizations handle and use such data.

The Website will also use the personal contact information provided by customers to inform them of the progress of their bookings. The Company may, from time to time, use the contact information of customers to send special promotional products, new services of the Website or the Company, valuable news and other latest information to the customers. All promotional emails contain an unsubscribe link. Customers can click on the unsubscribe link to notify the

Company if they do not wish to receive promotional information.

The Website maintains strict confidentiality of the personal data of online customers, and will not disclose the personal data of customers to any outside agencies unless approval has been obtained from the customers, or where such an act is performed in accordance with this privacy policy or as stipulated by the law, or when prior notice has been given to customers. The Company will only make disclosures when a government department or judicial agency requests us to disclose the personal data of a user in accordance with legal procedures, and the Company shall not bear any legal responsibility.

This Website uses reliable server software that supports security and encryption protocols. We will use this software and employ a variety of methods to ensure, to the greatest extent possible, that the information provided by users are not stolen or used illegally. However, the rapid development of the Internet has also brought on new risks that must pay attention to and prevent. As such, the Website is unable to guarantee that all transmissions on the Internet are hundred percent safe. Customers expressly agree that the risks present in their use of network services shall be completely and solely borne by them.

We are committed to the strict protection of information provided by customers. Customers have the right to request access to, correction or deletion of customer-related personal data held by the Company. If customers want to access, correct or delete such data, or have any inquiries, doubts or suggestions with regard to our privacy policy, they are welcome to write to the following personnel:

Personal Data Custodian
Hong Kong Wing On Travel Service Limited
30/F, Paul Y. Center
No. 51 Hung To Road, Kwun Tong, Kowloon, Hong Kong

The aforementioned policy is applicable to all customers, both registered and unregistered, on the Website and its affiliate websites.

In case of any discrepancy between the Chinese and English versions of this privacy policy, the former shall prevail.

Wing On Travel Website Privacy Policy

- 1 **Wing On Travel website, Wingontravel.com**, (hereinafter referred to as “**the Website**”, “**we**”, “**us**” or “**our**”) promises to respect and protect the privacy and personal data of customers. Therefore, we have formulated the following privacy policy to protect the personal data provided by customers to us. The approach related to the collection, use, storage, disclosure, transfer, confidentiality and access of personal data are compliant

with the provisions of the “Personal Data (Privacy) Ordinance”, Chapter 486 of the laws of Hong Kong Special Administrative Region, and we also ensured that the Website adopts reliable security and confidentiality standards.

“**Wing On Travel Membership**” is a membership service designed by Wing On Travel for its customers. The privacy policy of the Website is applicable to persons who hold a Wing On Travel membership and such persons are protected by its terms.

2 Collection and Use of Personal Data

2.1 The Website will only collect and store personal data that it deems relevant and helpful in understanding the travel needs of customers. In addition, such data will not be sold, exchanged or disclosed to third parties (excluding the subsidiaries, affiliates, suppliers, cooperative partners and business partners of the Website) for sales promotion or other purposes.

2.2 If the customer is a visitor to the Website but not a customer who has booked online service or has logged in to a member account on Wing On Travel website, the customer is not required to provide any personal data to browse or use the Website.

2.3 The data that we collect from the Wing On Travel membership account of customers or through the Website may be used for the following purposes:

2.3.1 Normal management and operations of Wing On Travel members;

2.3.2 To handle the membership application of customers;

2.3.3 To provide newsletters, member benefits and travel rewards to customers;

2.3.4 To be used for the conduct of research and surveys, development of plans, business promotion, and improvement of services and products for the subsidiaries and affiliates of the Website, as well as their suppliers and cooperative partners;

2.3.5 To perform matching on the relevant data, and to allow the Company and its affiliates, suppliers and cooperative partners to promote products and service to customer based on the matching results;

2.3.6 To verify the customer identity;

2.3.7 To provide anonymous reporting to the Company or customer;

2.3.8 To investigate complaints and suspicious transactions, as well as to research on measures for service improvement;

2.3.9 To prevent and detect crimes, as well as to make disclosure by law;

2.3.10 To serve as a general source of information or data for tours or other services;

2.3.11 For any purposes related to the aforementioned matters.

3 Use of Cookies

3.1 The Website uses “cookies” to store the web browsing history of customers. “Cookies” are a small file stored in the hard disk of the customer’s computer, which collects the customer’s preferences and browsing records on the Website. They allow the customer to browse the Website again in a simpler and faster manner and to enjoy more personalized website features.

3.2 Cookies do not collect personal data such as the customer’s name or email address,

and are unable to extract the customer's personal data directly from the computer hard disk. By using cookies to collect data related to web traffic, we are able to better meet the needs and expectations of the Website visitors.

- 3.3 Customers can modify the settings under the browser options. If a customer chooses to reject all cookies, the customer will still be able to browse the Website, but might not be able to use some of the services designed by the Website, or participate in some of the activities.
- 3.4 Third-party web beacons and cookies: The Website uses web beacons and cookies provided by third parties (including Yahoo) to improve your networking experience. The Website and third parties may use the information from your browsing of the Website and other websites in an anonymous manner to provide you with advertisements on products or services that are related to your interests. If you would like to find out more, or would like to know the options available if you do not want Yahoo to use such data, please refer to: <https://aim.yahoo.com/aim/hk/en-hant/optout/> .

4 Confidentiality and Security of Data

- 4.1 The Website is committed to ensure that the personal data provided by customers is well-protected. Only authorized and well-trained staff is allowed to access the relevant data. The Website is equipped with a comprehensive security program to ensure that the data provided by customers will not be lost or misused, and the relevant staff are allowed to use these data only in case of absolute need. Staff are also required to comply with a strict set of guidelines on how to use these personal data. However, the rapid development of the Internet has also brought on new risks that must pay attention to and prevent. As such, the Website is unable to guarantee that all transmissions on the Internet are hundred percent safe. Customers expressly agree that the risks present in their use of network services shall be completely and solely borne by them.
- 4.2 The Website uses the Secure Sockets Layer (SSL) encryption mechanism to encrypt data, so as to protect electronic transactions. Many browsers currently have the SSL function. SSL can encrypt the transaction data between the customer and the Website. When a customer purchases any products through the Website, the customer's credit card information will be encrypted before it is sent over the Internet, making it hard to be decoded and read, thus preventing the theft of and illegal access to the information.

5 The Right to Check and Correct Personal Data

According to the data protection principles of the Personal Data (Privacy) Ordinance, the Website users and Wing On Travel members have the right to check whether the Website possesses their personal data and to obtain a duplicate copy, as well as to request for incorrect information to be corrected, or for data that is not required to be retained by the law or retained for legitimate commercial use to be deleted.

6 Revision of the Privacy Policy

The Website reserves the right to revise the security and privacy policy at any time, and has the right to update, revise, re-publish or change the relevant content as needed at

any time. Therefore, customers are advised to check this webpage regularly to ensure that they have a clear understanding of the latest content of the relevant policy.

7 Inquiries and Suggestions

If customers have any inquiries, doubts or suggestions regarding our privacy policy, they are welcome to contact us at privacy_web@wingontravel.com.

Wing On Travel Member Privacy Policy

Wing On Travel Member (“member”) Privacy Policy Principles:

A basic policy of Wing On Travel Membership (hereinafter referred to as “**the membership**”, “**we**”, “**us**” or “**our**”) is to respect the personal data of members. We implement the following privacy policy principles to reflect the members’ trust in the membership:

1. The Company uses the personal data of members to provide member services and privileges to the members, as well as to contact the members and to promote products and service of the Company;
2. The Company will only collect personal data deemed relevant and helpful by the Company to understand the travel needs of the members and to facilitate the operations of the Company and the membership;
3. The Company will not release, edit or disclose supplementary information of members and non-public content stored in the member service of the Website, unless permitted or required by law or when the Company deems it is necessary to disclose these information on the basis of integrity.

Member Notice on the Personal Data (Privacy) Ordinance:

This statement is made by and based on the “Personal Data (Privacy) Ordinance” of Hong Kong (hereinafter referred to as “Privacy Ordinance”) with the aim of clarifying to the members about the reasons and purposes of collecting personal data and the ways to inquire about personal data records.

- 1 We will maintain the confidentiality of the personal data of members at all times. Our policies and practices regarding the collection, use, storage, disclosure, transfer, confidentiality and access of personal data are compliant with the laws and regulations of Hong Kong.
- 2 We collect the members’ personal data and information obtained from members’ use of services or products provided by the Company or the membership are for the following reasons and purposes:
 - 2.1 To implement and manage the services provided by us to the members, as well as to research on measures for service improvement;
 - 2.2 Our daily operations and conducting of member service management work;
 - 2.3 To handle the registration and service request of member;
 - 2.4 To provide a variety of privileges, newsletters and services for member;
 - 2.5 To design travel service or related products that customer are in need for the Company and/or the membership;

- 2.6 To be used for the research and surveys, development of plans and improvement of services and products for the Company and/or its subsidiaries, affiliates, suppliers and cooperative partners;
 - 2.7 To perform matching on the relevant information, and to allow the Company and/or its subsidiaries and affiliates to promote products and services to the member based on the matching results;
 - 2.8 To verify the member identity;
 - 2.9 To provide anonymous reporting to the Company or us;
 - 2.10 To serve as the general source of information or data for travel or other services;
 - 2.11 To investigate complaints and suspicious transactions, and perform risk management;
 - 2.12 To prevent and detect crimes, as well as to make disclosure by law;
 - 2.13 To comply with the information disclosure regulations of any applicable laws that are implemented on the Company or the membership;
 - 2.14 For any purposes related to the aforementioned matters.
- 3 Regarding the use of personal data for marketing: We intend to use your name, phone number and email address for promotion of products and services to be offered by our Company. We may not use your personal information without your consent. If you agree to the use of your personal data for marketing-related purposes, please put a tick in the box at the bottom of the Member Application Form or Member Registration webpage; if you do not put a tick in the relevant box, it means that you do not agree to the Company's use of your personal data for marketing purposes.
- 4 We shall maintain the confidentiality of all stored member-related data, but we may disclose member data to the following parties for the purposes stated in point 2 of the text above (both inside and outside Hong Kong):
- 4.1 Agencies, contractors or third-party service providers providing administrative, telecommunications, computer, printing, postal or any other services to the Company and/or us in its operations;
 - 4.2 Any other persons who have undertaken a duty of confidentiality to the Company and/or us, including the affiliates, service agencies, contractors or third-party service providers of the Company;
 - 4.3 To any persons, in the Company and/or the membership's fulfillment of its/their duty of disclosure in accordance with regulations that are legally binding to the Company and/or the membership, or in accordance with the instructions given by regulatory or other management agencies requiring the compliance of the Company and/or the membership.
- 5 Members are entitled to the following rights:
- 5.1 To inquire whether we store their data records and to check such data;
 - 5.2 To request us to correct any incorrect member-related data records;
 - 5.3 To find out our policies and practices on personal data, as well as to be informed of the types of personal data stored by us;
 - 5.4 To request us not to send advertising materials to member via email, SMS or direct

mail.

- 6 According to the Privacy Ordinance, We own the right to collect reasonable fees for the inquiry of personal data records.
- 7 If members want to inquire about their personal data records or correct any data, or inquire about our data collection policies and the types of data stored, please write to:
Customer Relations Department
Hong Kong Wing On Travel Service Limited
30/F, Paul Y. Center
No. 51 Hung To Road, Kwun Tong, Kowloon, Hong Kong

In addition, members can also call (852)2283 5777 to make an inquiry.

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