

#### 1. PURPOSE

The Fred Hollows Foundation and its subsidiary The Fred Hollows Foundation (HK) Limited (The Foundation) values transparency and privacy and is committed to collecting, using, disclosing, storing, handling and protecting your Personal Data in accordance with the Personal Data (Privacy) Ordinance (Cap. 486) (PDPO) and the Data Protection Principles (DPPs).

The Foundation has governance and management systems and processes directed towards reinforcing its commitment under this Statement. The measures put in place by The Foundation in this area are complemented by the initiatives it is undertaking to continually improve its operational effectiveness and further strengthen its governance, internal control, security, information protection and risk management practices.

## 2. **DEFINITIONS**

**Personal Data** - is data that relates directly or indirectly to a living individual from which it is practical for the identity of the individual to be directly or indirectly ascertained.

#### 3. COMMITMENTS UNDER THIS STATEMENT

#### 3.1 Collection of Personal Data

Most of the time, and where reasonable and practicable to do so, Personal Data will be collected directly from you.

From time to time your Personal Data may be obtained by us from third parties, such as third party health provider partners, our donors, supporters, volunteers, contractors, visitors to our field programs, and other individuals for various business and other purposes further listed in Section 3.2. In these circumstances, The Foundation will take reasonable and practicable steps at or before the time of collection (or as soon as practicable after collection) to notify the individual, or otherwise to ensure they are aware, that Personal Data has been collected and the circumstances of the collection.

The types of Personal Data The Foundation will collect from you will depend on the circumstances in which that information is collected. It may include:

- (a) contact details (i.e. your name, address, email, phone and facsimile details);
- (b) information about your employment (e.g. place of work, position, authority to transact with us, etc.);
- (c) information required as part of a recruitment process;
- (d) statistical information regarding the use of The Foundation's website/s;
- (e) health or other Sensitive Information, such as information about an individual's eye health; and
- (f) financial information and statistics including, bank account or credit card details needed to process donations or make payments to suppliers and partners, details of donations made and information regarding your potential capacity to donate (categorised in high-level bands and based on publicly available information only).

If you do not provide us with the information we request, we may not be able to fulfil the applicable purpose of collection, such as to receive your donation.

## 3.2 Use of Personal Data

The purposes and uses of collected Personal Data may include:

- processing donations;
- conducting marketing activities (please also see Section 3.3 for further details);



- communicating with supporters, donors and partner organisations;
- recruiting and managing staff, contractors, ambassadors and/or volunteers;
- monitoring, conducting analytics and evaluating our donation programs and strategy;
- conducting research and evaluation including as to your capacity to donate and for our donation raising activities;
- promoting eye health and related products and services;
- · conducting or supporting eye health screening or intervention activities; and
- enabling other activities and functions of The Foundation.

If there is a need to use Personal Data for any other purpose not set out in this Privacy Statement, The Foundation will only use Personal Data for a purpose other than for which it was collected or a related purpose only where The Foundation is permitted or required by law or, otherwise, if it obtains your consent to do so.

# 3.3 Direct Marketing

The Foundation may use your Personal Data for the purposes of direct marketing, for example in relation to products and/or services The Foundation may offer from time to time and/or communications relating to marketing (or seeking donations and the like) where we have received your consent or indication of no objection to do so.

The kinds of personal data to be used in the direct marketing include your:

- contact details (i.e. your name, address, email, phone and facsimile details); and
- information about your employment (e.g. place of work, position, authority to transact with us, etc.

Your personal data will be used to solicit donations or contributions to The Foundation and to inform you of our activities and events.

#### Communicating with us about your consent to direct marketing

If you receive any electronic direct marketing from The Foundation (e.g. via email) and no longer wish to receive marketing material from us (i.e. withdraw your consent to such marketing) please use the unsubscribe button at the bottom of the marketing emails sent to you where you will be able to unsubscribe any electronic marketing materials from The Foundation. The Foundation will then remove you from our marketing contact list.

If you otherwise wish to communicate with us directly about your consent to marketing, please contact The Fred Hollows Foundation, Room 1005, 10/F, OfficePlus @Prince Edward, 794-802 Nathan Road, Hong Kong Special Administrative Region or <a href="https://hkinfo@hollows.org">hkinfo@hollows.org</a> or +852 36146240. Please allow at least 7 days to process your request.

The Foundation does not sell Personal Data to third parties and, except as provided for in this Privacy Statement, does not make Personal Data available to third parties except where permitted or required to do so by law.

# 3.4 Disclosure of Personal Data

Personal Data will be used and disclosed/transferred for the purposes described in Section 3.3 above to the classes of entities/service providers noted below. The Foundation will not disclose Personal Data to other organisations (i.e. other than as detailed below) unless it is permitted or required by law to do so (including in emergency situations or to assist law enforcement).

The Foundation uses a range of suppliers, service providers, contractors and partners to whom your Personal Data may be disclosed to enable the activities and functions of The Foundation. These include information technology service providers, health provider partners, suppliers of healthcare products and services, direct marketing service providers, data and data analytics service providers (including those which collect and assess your financial data such as your capacity to donate), banks, credit card companies, recruitment agencies, professional advisers and insurers.



The Foundation's standard practice, in this case, is to require in our agreements with these third party providers, whether in Hong Kong or outside of Hong Kong, that providers must not retain Personal Data or Sensitive Information when it is no longer needed and must comply with this Privacy Statement and the Privacy Law unless otherwise permitted by law.

## 3.5 Security of Personal Data

We take reasonable steps to secure your Personal Data by storing it in a secure environment, and to keep this information accurate, up to date and complete.

However, because of the nature of the internet, security of Personal Data cannot be guaranteed. All unencrypted information exchanged via the internet may be accessed and used by people other than those for whom it is intended.

## 3.6 Access or corrections to your Personal Data

All reasonable steps are taken to ensure that your Personal Data collected, held, used, disclosed, stored and handled by the Foundation is complete, accurate, relevant and up-to-date.

Access to, corrections or removal of Personal Data, may be requested by contacting the Supporter Services team at The Fred Hollows Foundation, Room 1005, 10/F, OfficePlus @Prince Edward, 794-802 Nathan Road, Hong Kong Special Administrative Region or <a href="https://hkinfo.go/hollows.org">hkinfo.go/hollows.org</a> or +852 36146240. Verification of your identity will be sought before disclosing any Personal Data and we charge a reasonable fee for doing so but we will confirm the amount with you before processing your request.

Requests will be responded to as soon as is reasonably practicable and, in any case, no longer than 40 days. Generally, please allow at least 7 days for processing of a request. All reasonable steps to comply with a request will be made, unless there is a need to keep information for legal, auditing or internal risk management reasons.

#### 3.7 Online donations

Donations made online via The Foundation's websites are processed in real time using a secure payment gateway. Donations are processed in Hong Kong in Hong Kong Dollars. If there are any questions or concerns about making an online donation to The Foundation, please contact the Supporter Services team at The Fred Hollows Foundation, Room 1005, 10/F, OfficePlus @Prince Edward, 794-802 Nathan Road, Hong Kong Special Administrative Region or <a href="https://hkinfo.go/hkinfo

# 3.8 Cookies

When an individual visits or uses a website of The Foundation, Personal Data and user data may be collected automatically through cookies, including but not limited to: IP address and/or domain name; operating system (type of browser and platform); and the date, time and length of the visit to the website. Cookies are pieces of information that a website transfers to your computer's hard disk for record keeping purposes.

This information primarily is used for the compilation of statistical information about the use of The Foundation's website. Cookies may also be used to assist The Foundation and our third party service providers present personalised content and/or targeted and customised advertising to an individual on our website and/or on third party websites.

If you do not wish to receive any cookies you may set your browser to refuse cookies. This may mean you will not be able to take full advantage of the services on The Foundation's website.

## 3.9 Links to other websites

The Foundation's website may contain links to third party websites, and third party websites may also have links to The Foundation's website. These linked third party websites are not under our control and we are not responsible for the content of those websites. This Privacy Statement does not apply to external links or



other websites. These third party websites may collect your Personal Information. Before disclosing your Personal Information on any other website, The Foundation encourages individuals to read the privacy policies of any such website you link to from The Foundation's website/s. The Foundation is not responsible for any practices on linked websites that might breach your privacy.

# 3.10 Job applicants

When The Foundation receives an application for employment, Personal Data that was included in the application may be collected, such as your contact details, career history, education details, eligibility to work in the country where the role is based, written references and other career-related information.

Personal Data may also be obtained from the following third parties:

- Personal Data through a recruitment service provider;
- prior employment history from previous employers or nominated referees;
- criminal record history, by way of a criminal history check;
- eligibility to work in the country where the role is based, by way of a passport or visa status check; and
- educational qualifications, by way of requesting confirmation of qualifications or results from an academic institution.

If Personal Data is obtained from third parties, reasonable and practicable steps will be taken, at or before the time of collection (or as soon as practicable after collection) to notify an individual, or otherwise to ensure awareness of the collection of Personal Data.

Personal Data may be collected during the recruitment process for the purpose of assessing and progressing an application, inviting applicants to apply for future positions of interest at The Foundation and conducting statistical reporting and analysis in relation to the recruitment processes. Your Personal Data for future job opportunities may be held, unless specifically requested to be deleted.

A refusal to provide any of this information, or to consent to its proposed disclosure may affect the success of the job application.

## 3.11 If you have any concerns or wish to make a complaint

A designated Privacy Officer is responsible for investigating any complaints or concerns any person may have about protection of their privacy. Any ongoing concerns or problems identified concerning our privacy practices will be taken very seriously and work will be undertaken to address these concerns. There are no fees for lodging a complaint.

To make a complaint, please contact "The Privacy Officer" at The Fred Hollows Foundation, Room 1005, 10/F, OfficePlus @Prince Edward, 794-802 Nathan Road, Hong Kong Special Administrative Region or hkinfo@hollows.org or +852 36146240.

Please provide as much detail about the facts surrounding the complaint and any supporting evidence to allow satisfactory resolution and allow at least 7 days to respond to the complaint.

If you are not happy with the outcome of our investigation you may complain to the Office of the Privacy Commissioner for Personal Data, Hong Kong:

- By Post / In Person Room 1303, 13/F, Dah Sing Financial Centre, 248 Queen's Road East, Wanchai, Hong Kong
- **By Fax** 2877 7026
- By Email complaints@pcpd.org.hk

## 4. Monitoring & Review Cycle

The Foundation operates in a dynamic business environment. Over time, aspects of our operations may change as we respond to changing market conditions. This may require our Privacy Statement to be reviewed and revised. The Foundation reserves the right to change this Privacy Statement at any time and notify you by



posting an updated version of the Privacy Statement on the website. If at any point we decide to use Personal Data in a manner materially different from that stated at the time it was collected, we will notify individuals by email or via a prominent notice on our website.

Statement last updated 1 October 2024.