

“Privacy Policy Statement”

Privacy Policy Statement in relation to Customers’ Personal Data

1. Pledge

K11 Loyalty Program Limited (“K11”), who engages in major businesses of properties development and management and retail, pledges to comply with the requirements of the Personal Data (Privacy) Ordinance (Cap. 486) of the Laws of Hong Kong Special Administrative Region.

2. Collection of Information

You may be invited to provide to K11 your personal data on K11’s website(s) or through other media on a voluntary basis for different purposes at different times. If you are under the age of 18, you should obtain consent from your parent or guardian before you provide K11 with your personal data.

3. Use of Cookies and Log Files

When you browse the website(s) of K11, cookies will be stored in your computers, mobile phones or other devices for internal navigation and programming only. You can edit your browser settings to disable cookies but to do so you may not be able to utilize certain functionality of the website(s) of K11. In addition, the servers of K11 will collect data relating to your visits (including but not limited to your IP address, domain name, browser type and access time) and for the purpose of keeping log files, do not collect your personal data.

4. Kinds of Information Collected and Held

For the different purposes in the course of conducting K11’s business, you may be required to provide to K11 your personal data, which include your name, gender, e-mail address, mailing address, contact number, membership number, age group, marital status, family status, educational level, occupation, identification document number, household income group, consumption pattern, credit card information, username and password, etc. These are the kinds of personal data held by K11 in respect of its customers.

5. Main Purposes of Use of Information Collected

K11 may use your personal data for purposes relating to its daily operation of your membership account, administration of your membership accounts and records,

marketing analysis, research and development, advertising, marketing, public relations and direct marketing (including cross-marketing) in relation to charity (which includes solicitation of donation for the purposes of relief of poverty, advancement of education, advancement of religion and other charitable purposes) and provisions of goods, facilities and/or services in respect of properties development and management, department stores, consumer products, jewelries, hospitality and/or transportation (collectively, the “**Classes of Marketing Items**”), communicating news and information, identification for provision of goods, services, benefits, offers and promotions, processing of purchase orders, provision of goods, services and benefits, information and database administration, collection or recovery of any debt owned by you to K11, matters relating to a transfer of the business of or any shares in K11 or a change in the shareholdings of K11 or an amalgamation of K11 with another body, complying with any statutory or regulatory requirements and other purposes directly related to the aforesaid. When K11 collects from you your personal data for certain specified purposes, such specified purposes will be set out in the respective Personal Information Collection Statement.

6. Accuracy of Information

You may be requested to provide to K11 certain personal data (particularly relating to your contact information) for specific services. If you fail to provide or update accurate information as requested for each specific service, the provision of such services by K11 may be affected. If you wish to correct or update your personal data held by K11, please write to the Personal Data Privacy Officer of K11 at the address shown below.

7. Retention of Information

K11 will retain your personal data for a period no longer than necessary for the fulfillment of the purposes for which they are or are to be used. In general, personal data of subscriber or member of K11 will be retained for a period of not more than six years after termination of subscription or membership for verification, taxation and audit purposes.

8. Transfer and Disclosure of Information

For the purposes mentioned in clause 5 above, K11 may share your personal data with or transfer the same to: -

- (a) K11 Concepts Limited, K11 Design Store Limited, K11 (China) Limited, K11 Select Limited, K11 Art Foundation Limited, K11 Group Limited, New World Development Company Limited, New World Loyalty Programme Limited, New

World China Land Limited, New World Department Store China Limited, NWS Holdings Limited, Chow Tai Fook Jewellery Group Limited, Discovery Park Commercial Services Limited and their respective holding companies, associated companies, fellow subsidiaries and/or subsidiaries whose major businesses are the provision of such Classes of Marketing Items (collectively, “**New World Group**”);

- (b) the business associates and partners of K11 whose major businesses are the provision of such Classes of Marketing Items (collectively, “**K11 Business Partners**”);
- (c) agents, contractors, suppliers and service providers of engaged by K11 to assist with providing you K11’s services (including data processing service providers, mail processing service providers and information technology service providers) (collectively, “**K11 Service Providers**”);
- (d) the new owner of K11’s business; and
- (e) law enforcement agencies, regulatory authorities, government departments and related organizations, courts and tribunals, within Hong Kong or in Mainland China.

9. Direct Marketing

- (a) **Classes of Marketing Items:** K11 intends to use your contact details for direct marketing (including cross-marketing) in relation to such Classes of Marketing Items (mentioned in clause 5 above).
- (b) **Transferees:** In addition, K11 intends to provide your contact details to the **New World Group** (mentioned in clause 8(a) above) and **K11 Business Partners** (mentioned in clause 8(b) above).
- (c) **No Unconsented Use for Direct Marketing:** K11 may not so use or provide your contact details for direct marketing unless K11 has received your consent and/or indication of no objection for such use and such provision.
- (d) **Consent/Indication of No Objection:** You may, without charge by K11, communicate your consent to such use or provision by completing and sending the relevant Consent/Indication of No Objection Form to the Personal Data Privacy Officer of K11 at the address to be notified from time to time.

10. Opt-Out Direct Marketing

K11 respects your right to opt-out from direct marketing. If you do not wish to receive any marketing information from K11 or any of the company within New World Group or K11 Business Partners, or do not wish K11 to provide your contact details to any such company, please write to the Personal Data Privacy Officer of K11

at the address shown below. After receipt of your opt-out request, K11 will include you on K11's opt-out list and notify any such company to cease to use your contact details in direct marketing.

11. Third Party Merchants

K11 may have on-line stores or some services and/or products which are hosted in the website(s) of K11 but are operated by third party merchants. If you provide your personal data to the third party merchants in order to use, order or receive any services and/or products from the third party merchants, please note that your personal data is beyond the control of K11 and thus is outside the scope of protection afforded by K11. This Privacy Policy Statement only applies to the website(s) of K11. You should read the respective privacy policies of other websites before you submit any personal data to the third parties.

12. Third Party Websites

The website(s) of K11 may from time to time contain linkages to other websites. K11 has no control over your personal data submitted by you, if any, to other websites. This Privacy Policy Statement only applies to the website(s) of K11. You should read the respective privacy policies of other websites before you submit any personal data to the third parties.

13. K11 Business Partners and K11 Service Providers

In the event that K11 provides your personal data to K11 Business Partners and/or K11 Service Providers, K11 Business Partners and K11 Service Providers are under a duty of confidentiality to K11 and are required to use your personal data consistent with the agreements K11 enters into with them as well as this Privacy Policy Statement. In particular, they are required to ensure security of your personal data and not to keep your personal data longer than necessary.

14. Security of Information

The physical records of your personal data will be stored in secured places with restricted access. The electronic records of your personal data will be stored in the servers of K11 located in secured places and protected by adequate IT security measures. Only authorized personnel of K11 (who have been trained to handle your personal data properly and observe confidentiality) will have access to these records and servers on a "need-to-know" and "need-to-use" basis.

15. Matching

K11 may match your personal data with other databases of the New World Group for the specified purposes set out in the Personal Information Collection Statement. If any such matching may result in adverse action being taken against you, consent will be obtained from the Privacy Commissioner for Personal Data in accordance with the Personal Data (Privacy) Ordinance.

16. Exclusion

K11 may disclose your personal data as required by law, by any governmental departments, regulatory authorities, enforcement agencies and courts of competent jurisdiction where the disclosure is permitted under any applicable exemption provisions in the Personal Data (Privacy) Ordinance. K11 excludes all liability for disclosure of your personal data in this manner.

17. Use in Legal Proceedings etc.

If it becomes necessary for K11 to take legal action against you for recovering from you the debt you owe to K11, your personal data may be used by K11 in identifying and taking legal action against you.

18. Access and Correction of Information

You have the right to request either verbally or in writing:

- a. access to your personal data held by K11 (if any); and
- b. correction of your personal data that is inaccurate (if any).

All such requests will be handled by K11's Personal Data Privacy Officer promptly in accordance with the requirements of the Personal Data (Privacy) Ordinance. K11 may charge a fee, which will not be excessive, for processing your data access request.

19. Change of Privacy Policy

This Privacy Policy Statement may from time to time be updated, revised and changed. Any change, update or modification will be effective immediately upon being posted on website(s) of K11. You are advised to check it on a regular basis.

20. Change of Control

If the ownership of certain business of K11 changes, K11 may transfer your personal data to the new owner of such business so that the new owner may continue to operate the business subject to the condition that the new owner shall only make use of your personal data in accordance with this Privacy Policy Statement.

21. Enquiries and Requests

If you have any questions or wish to access or correct your personal data held by K11 or to make an opt-out request under clause 10, please contact the Personal Data Privacy Officer of K11 at:

K11 Loyalty Program Limited

10/F, Inter-Continental Plaza, 94 Granville Road, Tsim Sha Tsui, Hong Kong

Attention:

Legal Department

Personal Data Privacy Officer

(Marked Confidential)

22. English Version

If there is any inconsistency or conflict between the English and Chinese version of this Privacy Policy Statement, the English version shall prevail.