

## **New World CLUB Personal Information Collection Statement**

This Personal Information Collection Statement (this “Statement”) is made by New World Loyalty Programme Limited (“NWLP”) and New World CLUB (collectively with NWLP, “we”, “us”, or “our”), and applies between us and you (“you”, or “your”). New World CLUB is a loyalty programme operated by NWLP. This Statement should be read together with the Terms and Conditions (if any) of any mobile applications (including without limitation the Artisanal Living mobile application, the modular pages for New World CLUB and Artisanal Living on the K11 HK mobile application, digital wallets and/or other device(s) or application(s) (whether developed by us or our Affiliates)) that may be introduced and used from time to time in connection with our management and operation of New World CLUB (the “Applications”), and our official website at [www.newworldclub.com.hk](http://www.newworldclub.com.hk) (the “Website”) (the “Terms and Conditions”), provided that, in the event of any inconsistency between this Statement and the Terms and Conditions concerning matters relating to personal data that are handled by us, this Statement shall prevail.

NWLP and New World CLUB are part of the New World group of companies including New World Development Company Limited (“NWD”) and its affiliated or related companies from time to time (as listed here: <https://www.nwd.com.hk/pics>) (the “New World Group”, or “NWG”) whose activities include real estate (sale, leasing and investment), mortgage services, retail, property management, facilities management, activity planning and management, infrastructure, shopping malls, loyalty programmes, department stores, jewellery and luxury products, e-commerce, hospitality services, food and beverages, convention and exhibition centres, sports and recreational facilities, education, health care and senior care, other health and wellness products and services, financial services and insurance, transportation, sustainability programmes and products, TMT (Technology, Media and Telecom), corporate innovation, accelerator and incubation programmes, organization of competitions, conferences and events, start up and social innovation programmes and charitable pursuits including sports, recreation, art and cultural programmes, relief of poverty, advancement of education, advancement of religion, and other purposes that are beneficial to the community (the “Goods and Services”) (the New World Group and joint venture companies together referred to as “Affiliates”).

In order to enable us to perform the Purposes (as defined in the “Purposes for using personal data collected” section below), you are required to provide all the requested/mandatory personal data in the application form for New World CLUB membership and/or other relevant forms, documents or any other means for collecting personal data that we and/or New World CLUB (as the case maybe) may use in connection with our management, administration, and operation of New World CLUB, and New World CLUB-related pages of the Applications and/or Website, your New World CLUB membership and applicable reward campaigns (as the case may be). If you do not provide the required personal data, then we may not be able to perform the Purposes and/or provide the relevant Goods and Services to you.

If you are under 18 years of age, you should consult with your parent or legal guardian before sharing or providing your personal data to us. To protect your interest as a minor, even if you agree for us to use and disclose your

personal data for the relevant purposes as specified in this Statement, we will require your parent or legal guardian to give consent on your behalf before we proceed to so use and disclose your personal data.

### **Kinds of personal data collected**

The kinds of personal data we may collect from you and/or from other sources as mentioned below in this Statement include your name, gender, age (or age range), month of birth, date of birth (optional), contact details, e-mail address, mailing/residential/work/correspondence address (and proof thereof (if and where required)), contact number, membership number and/or any other unique identifier or personal identifier of the relevant club(s)/loyalty programme(s) that may be operated by us, our relevant Affiliates and/or relevant Marketing Partners (if applicable, as the case may be), marital status, family status, driving habits, driving ability, vehicle licence plate number, educational level, occupation, annual income, username and password, Log Files (see below), interests and favourite activities, language preference, tenancy agreement (if and where required), name card (if and where required), directorship and/or job position (and proof thereof (if and where required)), tracking information about your use of the Applications and/or the Website (as the case may be) and transaction information (including your characteristics and transaction behaviour on the Applications and/or the Website (as the case may be)) ("Tracking Data"), analytics data, social media account information, the relevant account metadata, transactional and/or activity records under or relating to your account(s) with the relevant club(s)/loyalty programme(s) operated by us, our relevant Affiliates and/or relevant Marketing Partners (if applicable, as the case may be), browsing history on the Applications and/or third party website browser (and where such third party browser is involved, the personal data we may collect will depend upon your privacy setting with the website browser), credit card and electronic/digital payment information, etc. For Tracking Data collected through the use of cookies and other tracking mechanisms, please also refer to our related policies (including but not limited to the New World Group Privacy Policy Statement and Cookies Policy) for further details as to how we collect, use and process Tracking Data. As our privileged and invaluable member, we would like to further collect your actual date of birth (which is only optional) for us to give to you (if any) bespoke birthday gifts and/or birthday rewards/offers/benefits on your actual date of birth and/or bespoke birthday celebration events, activities and/or campaigns on your actual date of birth organised by us, our relevant Affiliates and/or relevant Marketing Partners for you to be eligible to join or participate (if applicable, as the case may be), and if you are willing to provide this optional data to us, we will use for the aforesaid purpose only but not for other purposes. However, if you do not want to give us such optional data, you may still be eligible for our general birthday rewards/gifts that we may have during your month of birth if you consent to our direct marketing (see below).

For the avoidance of doubt, if where applicable, we will indicate which kind of personal data is mandatory or optional for you to provide at the relevant time of data collection, e.g. when you register your membership account(s) with the relevant club(s)/loyalty programme(s) operated by us.

## **Purposes for using personal data collected**

The personal data to be collected from you and/or from other sources as mentioned below in this Statement will be used and retained by us (and/or our Affiliates and/or our Marketing Partners as defined in the “Direct Marketing” section below, as applicable) for the following purposes (as may be applicable from time to time) (together, the “Purposes”):

- For daily operation and administration of your New World CLUB membership including processing bookings, purchases, orders or requests made by you, and contacting you in connection with the aforesaid;
- To send you birthday rewards/offers/benefits/gifts (if you have provided your birthday information and consented to direct marketing);
- Identifying and verifying your application for New World CLUB membership, identity and/or as a member of any of the relevant club(s)/loyalty programme(s), or other relevant programme(s) operated from time to time by us, our relevant Affiliates and/or relevant Marketing Partners (if applicable, as the case may be);
- Assisting you to register for your selected or designated membership(s) of other clubs/loyalty programmes or other relevant programme(s) of our Affiliates and/or our Marketing Partners (as the case may be) by transferring your relevant account information to the aforesaid programmes (as the case may be) for the purpose of registration; and enabling the consequent account administration, management and related functions of such selected or designated programmes for the purposes of, including without limitation, unified access control for your various accounts on the relevant programme’s website, app and/or app platform, data migration or synchronisation for or across your various accounts, and/or unified/centralised management of certain member rewards/benefits initiatives (e.g. K Dollars) that may be applicable to your various accounts. For avoidance of doubt, insofar as your personal data are transferred to such other programme(s) for any of the aforesaid purposes (as applicable), the handling of your personal data will be further subject to the terms and conditions and personal information collection statement of the operator(s) of those other applicable programme(s);
- If/where applicable, facilitating the administration, processing and/or distribution of the relevant member rewards/benefits (if any) (e.g. K Dollars) that you may be eligible for (if any) under New World CLUB and/or any of the related club(s)/loyalty or other programme(s) of our Affiliates of which you are also a member of, and/or your account(s) with the other participating companies you have registered or transacted with that honour or make available such rewards/benefits (hereafter “Other Participating Companies”), subject to the applicable terms and conditions/rules for those other club(s)/loyalty or other programme(s) and/or Other Participating Companies (as the case may be). Without prejudice to the generality of the foregoing, enabling the provision of and/or your usage of eligible member rewards/benefits (e.g. K Dollars) under the relevant club/membership events/campaigns, trade promotion competitions, activities, accounts and/or arrangements offered from time to time (whether solely or jointly)

by us, any other relevant club(s)/loyalty or other programme(s) of our relevant Affiliates and/or relevant Marketing Partners (if applicable, as the case may be) and/or the relevant Other Participating Companies (as the case may be). Likewise, for avoidance of doubt, insofar as your personal data are transferred to such other club(s)/loyalty or other programme(s) and/or Other Participating Companies for these purposes, the handling of your personal data will be further subject to the terms and conditions and personal information collection statement of the operator(s) of those other applicable club(s)/loyalty or other programme(s) and/or Other Participating Companies;

- Facilitating the activation and linking of your relevant member rewards/benefits wallet (if any) with your relevant account(s) (and corresponding member rewards/benefits wallet(s), if any/where applicable) with the other club(s)/loyalty programme(s) of our Affiliates, our Marketing Partners and/or Other Participating Companies running your account(s) with them (as the case may be);
- Registering you as a user of and allowing you access to the Applications and/or the Website (as the case may be);
- To serve you better and/or maintain your personal data and/or information across multiple pages within or across one or more sessions when using or accessing various services, functions, features or programmes managed, operated, provided, hosted or run by our relevant Affiliates within the Applications and/or the Website which we have identified to be applicable to you by reference to your membership profile, criteria and/or the relevance of those services, functions, features or programmes therein;
- Following registration as a user/member, accessing your account information (including, but not limited to, your name, membership number, etc.) and managing your account (including, but not limited to, changing your password, updating your personal information, subscribing/unsubscribing from direct marketing, processing eligible member rewards/benefits (if any) for your applicable account(s), etc.);
- Research, development, and analysis in relation to your/customer behaviour including carrying out data sorting and analysis to enable us to better understand your characteristics and transaction behaviour (subject to your consent for direct marketing, if/where applicable) to provide other goods and/or services better tailored to your needs, and to assist us in selecting Marketing Subjects (see below) that are likely to be of interest to you, and carrying out aggregated behavioural analysis, including using personal data for statistical analysis, data science studies and data mining. In the event that you have enabled the personalised recommendation feature on the Applications, your personal data will also be used for the AI Use-Cases (as further defined below);
- For you to make enquiries, complaints, and/or suggestions to us in relation to the Purposes and/or the Goods and Services (including, but not limited to, through an in-app text box on your mobile device or through our official social media page and/or our official website, or by text message, email and/or mail, and/or other media whether now known or available in the future);
- Seeking your feedback, including through surveys, in relation to the Purposes and/or the Goods and Services (including, but not limited to, through an in-app text box on your mobile device or through our official social media page and/or our official website, or by text message, email and/or mail, and/or other media whether now known or available in the future);

- Improving the Applications, the Website, the Purposes, and our and our Affiliates' and Marketing Partners' Goods and Services;
- Direct marketing and cross-marketing for the Marketing Subjects, subject to consent (see below section entitled "Direct marketing");
- Data analytics, profiling, information management and database administration;
- Deterring, detection, investigation and/or prevention of activities that may violate, or may be suspected to violate, our policies or may be abusive, illegal, and/or criminal;
- Collection or recovery of any debt owed by you to us or our Affiliates;
- The normal management, operation, and maintenance of the Applications, the Website and the provision of the Goods and Services to you;
- Storing your personal data (whether by a single or multiple Affiliates (including us) or our Marketing Partners) for the purpose of sharing such personal data with our Affiliates and/or our Marketing Partners for any and all of the other Purposes listed above (and subject to your consent in the event that transfer to any or all such data transferees for direct marketing are involved); and/or
- Other purposes ancillary or related to the above.

### **AI Engine and AI Use-Cases**

We and/or our Affiliates will also develop or procure, train and use artificial intelligence (AI) systems and related technologies ("**AI Engine**") for the business operations for or relating to the relevant clubs/loyalty programmes managed or operated by us and/or Our Affiliates (as the case may be).

To develop, train, calibrate or otherwise improve the AI Engine, we will anonymise your personal data as aggregate anonymous data to train the AI Engine. Otherwise, subject to your opt-in to the personalised recommendation feature on the Applications, we will use your relevant personal data that you have supplied to us and/or our Affiliates (including but not limited to gender, age group, nationality, marital status, family status, membership tiers, interest tags, purchasing history and/or browsing data) for the purposes of (a) providing you with customised/personalised recommendations and more relevant content, advertisements and/or direct marketing (subject to your consent, see the below section entitled "Direct Marketing" for more details), (b) facilitating precision marketing, lead generation and enhance conversion with tailored and personalised recommendations, and (c) facilitating and enhancing your user experience under or across your various account(s) and/or designated club(s)/loyalty programme(s)' website(s), app(s) and/or app platform(s) managed or operated by us and/or our relevant Affiliates (as the case may be) ("**AI Use-Cases**"). If/where applicable, likewise subject to your opt-in to the personalised recommendation feature on the Applications, we may transfer your personal data and/or analytics data generated from or relating to the deployment of the AI Engine to our relevant Affiliates for their use for the aforesaid AI Use-Cases for or in connection with the management and operation of their club(s)/loyalty programme(s) of which you may also be a member of. For the avoidance of doubt, your interaction and/or transactions with the AI Engine's recommended content, advertisements and/or direct marketing (if you have so consented) will be tracked, which will enable us

and/or our relevant Affiliates (as the case may be) to learn more from your preferences, interests and behaviour, and thus further improving the relevant personalised recommendations and suggestions to provide you with more tailored content, advertisements and/or direct marketing.

You may, at any time and without charge, opt-out from the AI Use-Cases by toggling to disable the personalised recommendation feature on the Applications. For the avoidance of doubt, your choice to disable such feature will only constitute as your opt-out from the AI Use-Cases, but does not further extend to constitute as your opt-out from direct marketing generally (i.e. direct marketing conducted without involvement or deployment of the AI Engine). Further, if you would like us to correct any inaccurate personal data processed by the AI Engine, you can make a request to our Personal Data Privacy Officer - please refer to "Your rights" section below for the relevant contact details. Once such request has been received, the AI Engine will automatically conduct the corresponding update, and thus the personalised recommendation feature on the Applications will also be updated accordingly. If and where necessary, we and/or our relevant Affiliates may from time to time implement the relevant technical measures to re-calibrate the AI Engine with a view to minimise potential errors and/or improper decision-making.

In any case, we and/or our relevant Affiliates will not use any minors' personal data in the AI Engine for any purposes (whether for the purpose of training the AI Engine and/or any of the AI Use-Cases).

#### **Those with whom we share personal data**

We may engage agents, contractors, suppliers and service providers (whether within or outside the Hong Kong Special Administrative Region of the People's Republic of China ("Hong Kong")) in connection with the Purposes and/or the provision of the Goods and Services, including but not limited to, e.g. IT/software solutions/technology services providers, marketing agents, social media, research companies, customer support outsourcing or customer relationship management service providers, and service providers of development and maintenance, administrative, data processing, digital storage, or other similar services, and may transfer to or share your personal data with them for the Purposes within or outside Hong Kong. We may also share your personal data (subject to your consent, if/where applicable) with our Affiliates, our Marketing Partners (see below) and the social media platforms that we and/or our Affiliates/our Marketing Partners (see below) use for such Purposes. Where we are required by the law of any country or place or requested by any court, regulatory body or governmental body of any country or place, we may also disclose your personal data as required. In the event of any actual or proposed transfer of business, transfer of shares, re-structuring, amalgamation, merger, sale, transfer, or purchase of us or our business or our Affiliates or our Affiliates' businesses, your personal data may be transferred to the new entity as part of the transaction, provided that the new entity abides by this Statement and continues to exercise the same level of care, in respect of your personal data, as we would. You will be notified of such event and you may decide to withdraw your consent to the use of your personal data.

Your personal data may be stored by us in physical locations and/or servers located within or outside Hong Kong

and/or shared with our Affiliates and/or our Marketing Partners (see below) located within or outside Hong Kong. However, we will take all reasonable measures to ensure that your personal data is stored and processed securely, regardless of the country or place in which it is stored, and we procure by contract or use our reasonable endeavours to ensure that our Affiliates and our Marketing Partners (see below) do the same.

### **Direct marketing**

Subject to your consent, we may use your personal data to send you direct marketing (including, but not limited to, special offers, news, information and marketing) about us, our Affiliates and/or our Marketing Partners (see below) in relation to the Marketing Subjects (see below) whether by in-app messages and/or notifications and/or push notifications to your mobile device, email, telephone, text message, or other media whether now known or available in the future.

Subject to your consent, we may also use your personal data for, or provide your personal data to, our Affiliates and/or our Marketing Partners (see below) so that they may send you direct marketing (including, but not limited to, special offers, news, information and marketing) about us, our Affiliates and/or our Marketing Partners (see below) in relation to the Marketing Subjects (see below) whether by in-app messages and/or notifications and/or push notifications to your mobile device, post, email, telephone, text message, and/or other media whether now known or available in the future.

Our “Marketing Partners” include property developers, banks, financial and investment institutions, credit card and electronic/digital payment companies, insurance companies, private clubs, concierge and customer service providers, retail outlets and online businesses (for various products and services including but not limited to fashion and beauty, accessories, hair dressing and grooming, health and personal cares, luxury, home and living, food, wine and beverage, electronics, books and stationery cigarettes and cigars, baby and children, veterinary and pet care, outdoor equipment), shopping malls, loyalty programmes, department stores, watches and jewellers (such as Chow Tai Fook Jewellery Group Limited), hotel chains, restaurants and lounges, catering services providers, healthcare and senior care, services and/or products providers including but not limited to body care, medical/pharmaceutical, health and wellness, art and culture, advertising and marketing, consultancy, gallery and exhibition, event management, green and nature, sports and recreation, travel and accommodation, leisure and entertainment, housekeeping, agriculture, installation and repair, engineering, architectural, transportation and logistics, telecommunication, media and information technology, business management, corporate innovation, accelerator and incubation programmes, competitions, conferences and events, legal, charities, education, pre-school, primary, secondary and/or tertiary education institutions. Without prejudice to the generality of the foregoing descriptions, our Marketing Partners may include Other Participating Companies that we may collaborate with from time to time and/or Other Participating Companies of our Affiliates of which you are also a member of their relevant club(s)/loyalty programme(s).

As we may share your personal data with our Affiliates and/or our Marketing Partners, we may also receive your personal data from them. Subject to your consent given to our Affiliates and/or our Marketing Partners, we may also use such personal data to send you direct marketing about us, our Affiliates and/or our Marketing Partners in relation to the Marketing Subjects (see below).

The types of products, services, events and charitable initiatives that we, our Affiliates and/or our Marketing Partners may market to you include the following (together, the “Marketing Subjects”):

- goods and services offered by us, our Affiliates, and/or our Marketing Partners (including but not limited to the relevant Other Participating Companies) in relation to the Goods and Services and/or the goods and services of those Other Participating Companies;
- finance, banking, mortgage, insurance and other related services and products by banks, financial and investment institutions, credit card and electronic/digital payment companies, and insurance companies;
- access and privileges at private clubs;
- professional consultation on customer services, including but not limited to event planning, holidays, hotels, travel, and tickets reservation;
- consumer products and services by retail outlets and/or online businesses, including clothing, shoes, fashion, fashion accessories and beauty, hair dressing and grooming, health and personal cares, luxury, home and living, household products, food, wine, liquor and beverages, confectionary, groceries, books and stationery, toys, cigarettes and cigars, fragrances and cosmetics, baby products, pet services and products, telephones and mobile devices, electronics and electrical appliances, computer software, games, bags and luggage, furniture, sports and leisure equipment, and entertainment and attraction;
- pharmaceutical products, medical and pharmaceutical services, therapists;
- tutoring, mentoring, home cleaning, janitor services, landscape and plant maintenance services, agricultural services, part time housekeeping, plumbing services, locksmiths, barber and salon services, gym and fitness services, laundry services, florists, vehicle towing, and motor vehicle services;
- reward, loyalty, privileges programmes and promotions at shopping malls and department stores;
- reward, loyalty, privileges programmes and promotions for customers and/or potential customers of the New World Group, our Affiliates, our Marketing Partners and/or Other Participating Companies;
- watches, jewellery and accessories;
- restaurants, lounges, catering services on food, wine and beverage;
- travel, hospitality and accommodation services and products, including but not limited to hotels and serviced apartments, holiday package products and services offered by travel agents, tickets to attractions;
- transportation and logistics services, including but not limited to air travel and non-air transportation services such as hotel transfers, car rentals, bus operators, train operators and cruise operators, and courier services and shipping services;
- conference and exhibition management services, consultancy and marketing research services, supply



chain management, event and project management services, gaming services, advertising and public relations services, media production services;

- tickets for concerts, galleries, exhibitions, films, theatricals, sporting, special and cultural events;
- green and nature activities;
- technology, telecommunication, internet and mobile communication services, social networking and media;
- graphic and interior design services, photography services, printing and publishing services;
- legal services, medical services, accounting, auditing, bookkeeping and taxation services, engineering services, architectural services, surveying services, equipment rental services, hospitality services;
- professional advice and/or consultation on education and/or personal enhancement;
- charitable initiatives which support areas including sports, recreation, art and cultural programmes, relief of poverty, advancement of education, advancement of religion and other purposes that are beneficial to the community.

Likewise, if you have enabled the personalised recommendation feature on the Applications, your personal data will also be handled for the AI Use-Cases in the manner as stated above.

We cannot use or provide your personal data for direct marketing purposes and/or provide your personal data to third parties (whether to our Affiliates and/or our Marketing Partners) for their direct marketing purposes unless you consent. Even if you give your consent, you can opt out of direct marketing - at any time (or you may request that we cease to provide your personal data to third parties, at which point we will cease to do so), free of charge, by emailing [privacy@newworldclub.com.hk](mailto:privacy@newworldclub.com.hk) or writing to our Personal Data Privacy Officer at 30th Floor, New World Tower, 18 Queen's Road Central, Hong Kong (marked Confidential).

## **Your rights**

Apart from your right to opt out of direct marketing as mentioned above, you have the following additional rights to:

- check whether we hold any of your personal data;
- access your personal data held by us;
- require us to correct any personal data which is inaccurate; and
- ascertain our policies and practices (from time to time) in relation to personal data and the types of personal data held by us.

If you would like to make a request in relation to the above (or make any general enquiries), please contact our Personal Data Privacy Officer at 30th Floor, New World Tower, 18 Queen's Road Central, Hong Kong or [privacy@newworldclub.com.hk](mailto:privacy@newworldclub.com.hk) (marked Confidential). In accordance with the Personal Data (Privacy) Ordinance (Cap. 486, Laws of Hong Kong) (the "PDPO"), we have the right to charge you a reasonable fee for the processing

of any personal data access request.

### **Privacy Policy Statement**

We adopt the New World Group Privacy Policy Statement. You can find out more about our policy on personal data protection by accessing the New World Group Privacy Policy Statement available at <https://nwd.com.hk/privacy-policy>. If there is any inconsistency or conflict between the New World Group Privacy Policy Statement and this Statement, this Statement shall prevail.

Please also see the New World Group Privacy Policy Statement for our policies and information about:

- our collection and/or use of Log Files (data relating to your use of/visits to the Applications and/or the Website (as the case may be), including but not limited to your IP address, domain name, browser type and access time);
- the use of cookies and other tracking mechanisms;
- retention of your personal data;
- third party merchants and/or websites that may be contained in the Applications and/or the Website (as the case may be);
- how we keep your personal data secure;
- use of your personal data in legal proceedings.

### **Inconsistency or conflict**

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

### **Miscellaneous**

This Statement may be updated from time to time to reflect changes to our policy with respect to personal data protection and/or changes to personal data/data privacy laws and regulations. Where there are significant changes, we will notify you and obtain your acceptance of the changes, consents, and/or opt in (as necessary or applicable). If you do not accept the changes and/or provide your consent, then we may not be able to perform the Purposes and/or provide goods or services to you. You are advised to check the Applications and/or the Website (as the case may be) for updates to this Statement on a regular basis.

Nothing in this Statement shall limit your rights under the PDPO.

## **PRC Addendum**

If you are:

- (i) an individual located in Mainland China who visits or uses the Applications or visits the Website, or otherwise uses or attends our premises, facilities, events, programmes, Goods and/or Services by phone or any other means from Mainland China; and/or
- (ii) an individual holding a Mainland China passport and/or resident identity card who visits, uses or attends our premises, facilities, events and/or programmes in Hong Kong or otherwise uses NWLP's Goods and/or Services by phone or any other means in Hong Kong,

your personal data will be processed by us in accordance with the "People's Republic of China Addendum" in addition to the New World Group Privacy Policy Statement, the NWLP's Privacy Policy Statement and this Statement, as well as the applicable data protection laws and regulations in Mainland China which, for the current purposes, excludes Hong Kong, the Macau Special Administrative Region of the People's Republic of China and Taiwan.

This Statement shall be governed by, and construed in accordance with, the laws of Hong Kong.