

## Privacy Policy Statement

### General

1. QTEC pledges to meet and comply with the requirements of the Personal Data (Privacy) Ordinance (Cap.486 of the Laws of Hong Kong) (“Ordinance”). In doing so, HKEdCity has committed itself to protect and keep in strict confidence any personal data (as defined below) collected.
2. This Statement is important and should be read thoroughly in order to understand the privacy policies of Quality Therapy and Education Centre and Quality Therapy and Education Limited (“QTEC”) in respect of any personal data it collects from you, as a data subject (as defined below).
3. QTEC may amend, update, vary or add to this Statement from time to time without any prior notice as necessary and any revised Statement will be published on this website.
4. By accessing and using this QTEC’s website and any of its pages, you are agreeing to the terms and conditions set out herein.
5. If there is any inconsistency between the English version and the Chinese version of this Statement, the English version shall prevail.

### Type of Personal Data

6. The term “personal data”, wherever mentioned in this Statement, includes the following kind of information:-
  - a. All the data which may be collected or held by QTEC from time to time in connection with the therapy consultation, phone enquiries, on-line enquiries, registration, establishment of user’s account or the use or continuation of provision of educational services, products and facilities, the following data relating to a data subject (including any updated data of any of the following data):
    - i. full name;
    - ii. date of birth;
    - iii. correspondence address and/or residential address;
    - iv. e-mail address;
    - v. telephone number;
    - vi. fax number;
    - vii. Hong Kong Identity Card Number or travel document number;
    - viii. school name;

- ix. medical history; and
    - x. information as referred to in the paragraphs below under ‘Cookies, Domain Names and IP Addresses’.
  - b. Information collected through computer technologies by third parties whom QTEC works with to find out more about users of QTEC website, including number of the visitors, behaviour and usage patterns, for more accurate reporting and to improve the effectiveness of marketing of QTEC.
  - c. Other data collected from data subjects in the ordinary course of the continuation of the relationship between QTEC and data subjects such as the followings:
    - i. when a data subject uses QTEC’s website;
    - ii. when a data subject submits any work or statement through QTEC’s website;
    - iii. when a data subject takes part in any activities published by QTEC on its website or other website linked to QTEC’s website;
    - iv. when a data subject enters into, uses and/or makes a comment on a discussion board, blog or similar forum established on QTEC’s website; and
    - v. when a data subject participates in online activities as published on QTEC’s website including learning software, online learning games, competitions, assessments, exercises and other online activities as published from time to time.
7. The term "data subject(s)", wherever mentioned in this Statement, includes the following categories of individuals:-
  - a. Students;
  - b. Parents;
  - c. Teachers;
  - d. Users of QTEC’s website; and
  - e. Users of education related services and products so forth provided by QTEC or its partners.
8. For the avoidance of doubt, "data subjects" shall not include any incorporated bodies. The contents of this Statement shall apply to all data subjects and form part of any contracts for services that the data subjects have or may enter into with QTEC from time to time. If there is any inconsistency or discrepancy between this Statement and the relevant contract, this Statement shall prevail insofar as it relates to the protection of the data subjects' personal data. Nothing in this Statement shall limit the rights of the data subjects under the Ordinance.

## **Cookies, Domain Names and IP Addresses**

9. When you browse this website, your visit to this website may be recorded for analysis on visitor flow and general usage patterns analysis. Some of this information will be collected through the use of cookies (as defined below).
10. “Cookies” are small bits of information that are automatically stored in your computer hard drive which can be retrieved by this website.
11. Cookies can make the site more useful by storing information about your preferences on particular websites and thus enabling QTEC as website owners to provide more useful features for its users. The information collected by cookies is anonymous aggregated research data, and contain no name or address information or any information that will enable anyone to contact you through telephone, e-mail or any other means. Most web browsers are initially set to accept cookies and if you would prefer, you can disable the functionality of cookies. However, by disabling cookies, you may not be able to take full advantage of QTEC’s website.
12. Every time you log on to this website, QTEC will, through its network servers, automatically collect your domain name and IP address for the purpose of verification and QTEC will use such data for visitor flow statistical and data analysis.

## **Collection of Personal Data**

13. From time to time, it is necessary for the data subjects to supply QTEC with personal data in connection with the registration and establishment of user’s account or the use or continuation of provision of educational services, products and facilities.
14. QTEC may work with third parties that use applications or computer technologies to find out more about users of QTEC’s website.
15. Failure to supply such personal data may result in QTEC being unable to register and establish a user account or use or continue the provision of educational services and products and facilities.

## **Protection of Children under the age of 18**

16. Data subjects who are under the age of 18 must obtain permission from their parents or legal guardians before providing any personal data to QTEC.

## Purposes of Use of Personal Data Collected

17. The purposes for which the personal data relating to the data subjects may be used will vary depending on the nature of the data subjects' relationship with QTEC, they may include the following :
- a. assessing the merits and suitability of the data subjects as actual or potential applicants for educational services, products and facilities;
  - b. conducting statistical and data analysis;
  - c. allowing a purchase or an obtaining of a product or service introduced or referred to by QTEC;
  - d. communicating with data subjects or its authorized;
  - e. enabling QTEC to ensure smooth operation of the products, services and facilities provided to the data subjects, and to improve, optimize and configure the services for the data subjects;
  - f. researching and/or designing and/or implementing education related services, products and facilities for data subjects' use;
  - g. marketing services, products and other subjects (please see further details related to 'Direct Marketing' below);
  - h. conducting, or allowing to be conducted, research on usage and activities on parts of QTEC's website including number of visitors, behavior and usage patterns, for more accurate reporting and to improve the effectiveness of marketing of QTEC;
  - i. performing investigation or inquiry of any illegal conduct;
  - j. complying with obligations, requirements, arrangements or procedures that apply to QTEC or that it is expected to comply according to:
    - i. any law binding or applying to it within the Hong Kong Special Administrative Region ("Hong Kong") existing currently and in the future;
    - ii. any guidelines or guidance given or issued by any legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies within Hong Kong existing currently and in the future; and
    - iii. any contractual obligations or other commitment applying to it under any contractual arrangement QTEC has with its agent, representative, contractor, business partner or other third party which QTEC has entered into a contractual relationship with;

- k. maintaining an usage or purchase history or pattern of data subjects for QTEC to evaluate into future opportunity in education products, services and facilities; and
- l. purposes incidental, associated or relating to any of the above items (a) to (j).

### **Transfer of Personal Data Collected**

18. Personal data held by QTEC relating to data subjects will be kept confidential but QTEC may provide and disclose (as defined in the Ordinance) such personal data to the following parties for the purposes set out in the previous paragraph:-

- a. any agent, contractor, business partner or other third party which QTEC works together with in its provision of such service, product or facility, wherever situated;
- b. any party that a data subject has initiated a business transaction with or will make a payment to or through;
- c. any party to whom QTEC is under an obligation or otherwise required to make disclosure under the requirements of any law binding or applying to it within or outside Hong Kong, or any disclosure under and for the purposes of any guidelines or guidance given or issued by any legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies with which QTEC is expected to comply, or any disclosure pursuant to any contractual or other commitment of QTEC, all of which are within Hong Kong and may be existing currently and in the future;
- d. such party as authorized to receive a response from QTEC in accordance with Part V of the Ordinance; and

### **Storage of Personal Data and Security**

19. All personal data collected from data subjects will be stored in secure servers of QTEC in order to prevent any unauthorized or accidental access, processing or erasure.
20. QTEC maintains this commitment to data security by implementing appropriate physical, electronic and managerial measures to safeguard and secure personal data.
21. QTEC will take all practical steps to ensure that personal data will not be kept longer than necessary and QTEC will comply with all statutory and regulatory requirements of Hong Kong concerning the retention of personal data.

22. While QTEC does everything it can to protect personal data from unauthorized use, processing and disclosure, data subjects should take precaution not to share, provide or facilitate unauthorized use of a unique username and/or password assigned by QTEC or allow access or use of it by others. If, in the unlikely event, unauthorized transactions have been discovered through no fraud, fault or negligence on the part of data subjects, the data subjects should inform QTEC immediately.

## Direct Marketing

23. QTEC intends to use the data subject's data in direct marketing and QTEC requires the data subject's consent (which includes an indication of no objection) for that purpose.
24. The specific requirement regarding data subject's consent (which includes an indication of no objection) under Part VIA of the Ordinance shall take effect on 1st April 2013. In this connection, please note that:-
- a. the name, contact details, product and services portfolio information, usage pattern and demographic data of the data subject held by QTEC from time to time may be used by QTEC in direct marketing and the following classes of services, products and subjects may be marketed:
    - i. education related services, products and facilities;
    - ii. co-branding partners of QTEC for a particular service, product or facility which can be found on QTEC's website as the case may be; and
  - b. other than marketing the above services, products and subjects itself, QTEC does not intend to provide any personal data to all or any of the persons described in paragraph 18 for use by them in direct marketing, and QTEC requires the data subject's written consent (which includes an indication of no objection) for that purpose.
25. If a data subject does not wish to receive any marketing and other promotional materials from QTEC, a data subject can always have an opportunity to opt-out by email to [unsubscribe@hktherapy.com](mailto:unsubscribe@hktherapy.com) or by fax to 8103 1882 or by mail sent to 22/F, Yam Tze Commercial Building, 23 Thomson Road, Wanchai, Hong Kong. QTEC will then, at no cost to the data subject, act on the request to opt-out within 14 days and ensure that the data subject will not be included in future direct marketing promotions.

## **Rights of Access or Correction of Personal Data**

26. In accordance with the terms of the Ordinance, QTEC has the right to charge a reasonable fee for the processing of any data access request. Any data access request must be made in writing and with completed form as prescribed under the Ordinance.
27. The persons to whom requests for access to data or correction of data or for information regarding policies and practices and kinds of personal data held are to be addressed is as follows:-

Quality Therapy and Education Centre  
22/F, Yam Tze Commercial Building,  
23 Thomson Road, Wanchai, Hong Kong  
Email: [info@hktherapy.com](mailto:info@hktherapy.com)  
Fax: 8103 4882  
Tel : 8103 1882

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