



Network Box Corporation Ltd.

Personal Data Protection Policy

(ver1.1)

Network Box Corporation Limited,
its regional branches, members of the Network Box Group and
authorized distributors

This policy applies to:

- Network Box Corporation Limited.
- All regional offices and members of the Network Box Group.
- All Authorized Distributors of Network Box Corporation Limited's products and services.
- All staff and volunteers of Network Box Corporation Limited.
- All contractors, suppliers and other people working on behalf of Network Box Corporation Limited.

Policy operational date: 02 March 2015

Policy prepared by: Albert Chan, **Network Box Corporation Limited**

Date approved by Board/Management Committee: 25 February 2015

Policy Overview

The purpose of this policy is to enable Network Box Corporation Limited to:

- Comply with the law in respect of the data it holds about individuals.
- Follow good practice.
- Protect Network Box Corporation Limited's supporters, staff and other individuals.
- Protect the organization from the consequences of a breach of its responsibilities.

It applies to all data that the company holds relating to identifiable individuals.

This can include:

- Names of individuals.
- Postal addresses.
- Email addresses.
- Telephone numbers.
- and any other information relating to individuals.



Policy Statement

Network Box Corporation Limited will:

- Comply with both the law and good practice.
- Respect individuals' rights .
- Be open and honest with individuals whose data is held.
- Provide training and support for staff and volunteers who handle personal data, so that they can act confidently and consistently.

Network Box Corporation Limited recognizes that its first priority is to avoid causing harm to individuals. This includes:

- Keeping information securely in the right hands, and
- Holding good quality information.

To ensure that the legitimate concerns of individuals about the ways in which their data may be used are taken into account. In addition to being open and transparent, Network Box Corporation Limited will seek to give individuals as much choice as is possible and reasonable over what data is held and how it is used.

Data Protection Risks

Network Box Corporation Limited has identified the following potential key risks, which this policy is designed to address:

- Breach of confidentiality (information being given out inappropriately).
- Insufficient clarity about the range of uses to which data will be put - leading to Data Subjects being insufficiently informed.
- Failure to offer choice about data use when appropriate.
- Harm to individuals if personal data is not up to date.
- Insufficient clarity about the way sessional workers' or volunteers' personal data is being used. (e.g. given out to general public)
- Failure to offer choices about use of contact details for staff, volunteers, sessional workers or branch officers.
- Data Processor contracts

Trustees

Everyone who works for or with Network Box Corporation Limited has some responsibility for ensuring data is collected, stored and handled appropriately. Each team that handles personal data must ensure that it is handled and processed in line with this policy and data protection principles.

However, these people have key areas of responsibility:

- The **Board of Directors** is ultimately responsible for ensuring that Network Box Corporation Limited meets its legal obligations.
- The **Data Protection Officer** is responsible for:
 - Keeping the board updated about data protection responsibilities, risks and issues.
 - Reviewing all data protection procedures and related policies, in line with an agreed schedule.
 - Arranging data protection training and advice for the people covered by this policy.
 - Handling data protection questions from staff and anyone else covered by this policy.
 - Dealing with requests from individuals to see the data Network Box Corporation Limited holds about them (also called ‘subject access requests’).
 - Checking and approving any contracts or agreements with third parties that may handle the company’s sensitive data.
- The **Chief Technology Officer** is responsible for:
 - Ensuring all systems, services and equipment used for storing data meet acceptable security standards.
 - Performing regular checks and scans to ensure security hardware and software is functioning properly.
 - Evaluating any third-party services the company is considering using to store or process data.
- The **Marketing Manager** is responsible for:
 - Approving any data protection statements attached to communications such as emails and letters.
 - Addressing any data protection queries from journalists or media outlets like newspapers.
 - Where necessary, working with other staff to ensure marketing initiatives abide by data protection principles.



General Staff Guidelines

All staff and volunteers are required to read, understand and accept any policies and procedures that relate to the personal data they may handle in the course of their work.

- The only people able to access data covered by this policy are those who need it for their work.
- Data will not be shared informally. When access to confidential information is required, employees can request it from their supervisor.
- Network Box Corporation Limited will provide training to all employees to help them understand their responsibilities when handling data.
- Personal data will not be disclosed to unauthorized people, either within the company or externally.
- If data is no longer required, it will be deleted and disposed of.
- Employees will request help from their supervisor or the data protection officer if they are unsure about any aspect of data protection
- Personal data shall only be collected if it is necessary for or directly related to the business of Network Box Corporation Limited and the data collected must be adequate but not excessive.
- If Network Box Corporation Limited engages a data processor, to process personal data on Network Box Corporation Limited's behalf, Network Box Corporation Limited must adopt contractual or other means to prevent any personal data transferred to the data processor from being kept longer than is necessary for processing of the data.

Significant breaches of this policy will be handled under Network Box Corporation Limited's disciplinary procedures.



Personal Data Storage

All electronic data is stored on a secured server, protected from unauthorized or accidental access, processing, erasure, deletion, loss or use or malicious hacking/intrusion attempts. Network Box Corporation Limited will regularly review its procedures for ensuring that its records remain accurate and consistent and, in particular:

- Data on any individual will be held in as few places as necessary, and all staff and volunteers will be discouraged from establishing unnecessary additional data sets.
- Effective procedures will be in place so that all relevant systems are updated when information about any individual changes.
- Staff or volunteers who keep more detailed information about individuals will be given additional guidance on accuracy in record keeping.
- Access to data will be protected by strong passwords that are never shared between employees.
- If data is stored on removable media (e.g. CD, DVD, etc.), these are kept locked away securely when not being used.
- Servers containing personal data is sited in a secure location, away from general office space.
- Data is backed up frequently. Those backups are tested regularly, in line with the Network Box Corporation Limited's standard backup procedures.
- Data is never saved directly to laptops or other mobile devices like tablets or smart phones.
- All servers and computers containing data are protected by approved security software, and monitored and audited regularly.
- If Network Box Corporation Limited engages a data processor, to process personal data on Network Box Corporation Limited's behalf, it must adopt contractual or other means to prevent unauthorized or accidental access, processing, erasure, loss or use of the data transferred to the data processor for processing.

Archived paper records are kept in a secure place where unauthorized personnel will not have access to them. These guidelines also apply to data that is usually stored electronically but has been printed out:

- When not required, the paper or files should be kept in a locked drawer or filing cabinet.
- Employees should make sure paper and printouts are not left where unauthorized personnel can see them (e.g. in a printer tray, workstation, etc.).
- Data printouts will be shredded and disposed of securely when no longer required.



Transparency and Subject Access Request

Whenever data is collected, the number of mandatory fields will be kept to a minimum. Network Box Corporation Limited is committed to ensuring that in principle, individuals who are the subject of personal data held by Network Box Corporation Limited (Data Subjects), are aware that their data is being processed and:

- for what purpose it is being processed;
- what types of disclosure are likely; and
- how to exercise their rights in relation to the data.

All Data Subjects are entitled to a Subject Access Request.

- Any Subject Access Requests will be handled by the Data Protection Officer.
- Subject Access Requests must be in writing.
- All those making a subject access request will be asked to identify any branches or sessional workers who may also hold information about them, so that this data can be retrieved.
- Where the individual making a Subject Access Request is not personally known to the Data Protection Officer their identity will be verified before handing over any information.
- The Data Protection Officer will aim to provide the relevant data within 10 working days.



Direct Marketing

Network Box Corporation Limited will treat the following unsolicited direct communication with individuals as marketing:

- Promoting any Network Box Corporation Limited products and services.
- Promoting seminars and events.
- Promoting Network Box Corporation Limited related news and updates

Whenever data is collected which might be used for any marketing purpose, the Data Subject will be given a clear opt out. If it is not possible to give a range of options, any opt-out which is exercised will apply to all Network Box Corporation Limited marketing.

Whenever Network Box Corporation Limited intends to use a data subject's data in direct Marketing, Network Box Corporation Limited requires the data subject's consent for that purpose.

Under no circumstances will Network Box Corporation Limited share or exchange lists with other organizations for marketing-type activities.



Appendix 1: Privacy Statement

When you request information from Network Box Corporation Limited, sign up to any of our services or buy things from us, Network Box Corporation Limited obtains information about you. This statement explains how we look after that information and what we do with it.

We have a legal duty to prevent your information falling into the wrong hands. We must also ensure that the data we hold is accurate, adequate, relevant and not excessive.

Normally, the only information we hold comes directly from you. Whenever we collect information from you, we will make it clear which information is required in order to provide you with the information, service or goods you need. You do not have to provide us with any additional information unless you choose to. We store your information securely, we restrict access to those who have a need to know, and we train our staff in handling the information securely.

The data collected from you may be used for any one or more of the following purposes:

- processing applications from you for the provision of our services and products to you;
- operating, maintaining and providing services and products to you;
- conducting credit checks on you (whether in respect of an application for services and products or during regular or special review);
- maintaining your credit history for present and future reference;
- ensuring your ongoing credit worthiness;
- designing new services and products for your use;
- marketing services, products and other subject;
- determining the amount of indebtedness owed to or by you;
- enforcement of your obligations, including without limitation the collection of amounts outstanding from you;
- meeting or complying with any obligations, requirements or arrangements for disclosing and using data that apply to Network Box Corporation Limited or any other member of Network Box Group or that it is expected to comply according to:
 - any law or regulation binding on or applying to it, existing currently and in the future;
 - any guidelines or guidance given or issued by any legal, regulatory, government, tax, law enforcement or other authorities, or self-regulatory or industry bodies, existing currently and in the future;
- enabling an actual or potential assignee of all or any part of the business and/or asset of Network Box Corporation Limited, to evaluate the transaction intended to be the subject of the assignment; and/or
- any other purposes relating to the purposes listed above.



16th Floor, Metro Loff, 38 Kwai Hei Street, Kwai Chung, Kowloon, Hong Kong.
Tel: (852) 2736 2083 Fax: (852) 2736 2778

If you have offices in other regions, we may pass your contact details to your regional office, so that they can let you know what services are available in that area.

Your data held by Network Box Corporation Limited is kept confidential but Network Box Corporation Limited may provide, transfer or disclose such data or information to any one or more of the following parties for the purposes set out below:

- any agent, contractor or third party service provider who provides administrative, telecommunications, computer, payment or securities clearing or other services to Network Box Corporation Limited in connection with the establishment, operation, maintenance or provision of services and products;
- any other person under a duty of confidentiality to Network Box Corporation Limited including any other member of Network Box Group which has undertaken to keep such information confidential;
- any person or entity to whom Network Box Corporation Limited or any other member of Network Box Group is under an obligation or otherwise required to make disclosure under the requirements of any law or regulation binding on or applying to Network Box Corporation Limited or any other member of Network Box Group, or any disclosure under and for the purposes of any guidelines, guidance, directives, rules, codes, circulars or other similar documents or given by any legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies with which Network Box Corporation Limited or any other member of Network Box Group is expected to comply;
- any actual or proposed assignee of all or any part of the business and/or asset of Network Box Corporation Limited;
- external service providers (including but not limited to mailing houses, telecommunication companies, telemarketing and direct sales agents, call centres, data processing companies and information technology companies) that Network Box Corporation Limited engages for the purposes of processing the data.

We may contact you in future to tell you about news, events and other services we provide. If we intend to use your data in direct Marketing, we need your consent for that purpose. You have the right to ask us not to contact you in this way. We will always aim to provide a clear method for you to opt out. You can also contact us directly at any time to tell us not to send you any future marketing material.



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You have the right:

- to check whether Network Box Corporation Limited holds data about you and/or access to such data;
- to require Network Box Corporation Limited to correct any data relating to you which is inaccurate;
- to ascertain Network Box Corporation Limited's policies and procedures in relation to data and to be informed of the kind of personal data held by Network Box Corporation Limited and/or have access to;
- to a copy of all the information Network Box Corporation Limited holds about you (apart from a very few things which Network Box Corporation Limited may be obliged to withhold because they concern other people as well).

The person to whom requests for access to or correction of data held by Network Box Corporation Limited, its regional branches, its authorized distributors, and members of the Network Box Group; or for information regarding Network Box Corporation Limited's data policies and practices and kinds of data held by Network Box Corporation Limited, are to be addressed is as follows:

**DATA PROTECTION OFFICER
NETWORK BOX CORPORATION LIMITED**

**16TH Floor Metro Loft, 38 Kwai Hei Street,
Kwai Chung, Hong Kong.**

There is a charge of USD\$50 for a copy of your data. Network Box Corporation Limited aims to reply as promptly as we can and, in any case, within 10 working days.



Appendix 2: Confidentiality statement for staff and volunteers

When working for Network Box Corporation Limited, you will often need to have access to confidential information which may include, for example:

- Personal information about individuals who are supporters or otherwise involved in the activities organized by Network Box Corporation Limited.
- Information about the internal business of Network Box Corporation Limited.
- Personal information about colleagues working for Network Box Corporation Limited.

Network Box Corporation Limited is committed to keeping this information confidential, in order to protect people and Network Box Corporation Limited. 'Confidential' means that all access to information must be on a need to know and properly authorized basis. You must use only the information you have been authorized to use, and for purposes that have been authorized. You should also be aware that, unauthorized access to data about individuals is a criminal offence.

You must assume that information is confidential unless you know that it is intended by Network Box Corporation Limited to be made public. Passing information between regional offices does not count as making it public, but passing information to another organization does count.

You must also be particularly careful not to disclose confidential information to unauthorized people or cause a breach of security. In particular you must:

- not compromise or seek to evade security measures (including computer passwords);
- be particularly careful when sending information;
- not gossip about confidential information, either with colleagues or people outside Network Box Corporation Limited;
- not disclose information unless you are sure that you know who you are disclosing it to, and that they are authorized to have it.

Your confidentiality obligations continue to apply indefinitely after you have stopped working for Network Box Corporation Limited.



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