

TRANSUNION PRIVACY POLICY

TransUnion Limited (“**TransUnion**”) is committed to protecting your privacy, and supports a general policy of openness about how we collect, use and disclose the personal information of Hong Kong consumers.

This TransUnion Privacy Policy provides an overview of our business and explains how we collect, use and disclose the information about consumers that appears in our database, TransUnion mobile application (“**TransUnion Mobile**”) or web site, www.transunion.hk (the “**Site**”).

1. Collection of Personal Information

1.1 We collect your personal information primarily from the following sources:

- (a) credit providers who are our members who provide credit information about you, including credit card and consumer loan data, hire purchase data and mortgage data;
- (b) directly from you when you:-
 - (i) provide us with comments regarding our services;
 - (ii) access or use any Products (as defined under our [Service Agreement](#)) or functions in our Site or TransUnion Mobile. You may be asked to provide information through our Site or TransUnion Mobile for various purposes such as applying for your credit report on-line, making enquiries with us or using our Products or functions. You may provide to us certain personal information, such as first and last name; address; date of birth; identity document number; contact number; email address; account ID and password; and credit card information. We will use the information collected from you for the purpose for which you provided such information;
 - (iii) decide to purchase one of our products or services, subscribe to our emails or newsletter, participate in one of our contests or surveys or transact other business with us, use any Products or functions in our Site or TransUnion Mobile;
 - (iv) submit any information for an employment purpose;
 - (v) post, publish, transmit, upload any content to our Site or TransUnion Mobile;
 - (vi) use any Products or functions, participate in events, surveys, activities via our Site or TransUnion Mobile; or
- (c) publicly available records.

1.2 Information We Collect

- (a) **Personal and Credit Information.** TransUnion may collect the following information and your Credit Reports may contain, including but not limited to, the following personal information:-
- (i) Identifying information: name, address history, contact number history, identity document numbers;
 - (ii) Credit account information : Open and closed accounts, past due accounts and amounts;
 - (iii) Credit application enquiry information : enquiries from members regarding your applications for credit;
 - (iv) Other enquiry information: review checks by members;
 - (v) Public record and related data: public information relating to action for recovery of debt, judgments for monies owed and bankruptcies;
 - (vi) Credit score based on your credit information; or
 - (vii) Any information permitted by law.
- (b) **Internet Information.** When you visit and use any Products or functions in our Site or TransUnion Mobile, we may collect the behavioral data and general internet data, including your internet protocol ("IP") address, metadata, location data, date and time you visit:-
- (i) A "cookie" is also set on your computer or mobile phone to allow us to recognize you whenever you visit and collect information, like the pages you visit and the preferences you choose. We use the information we collect for statistical purposes and to study how our Site or TransUnion Mobile is used so that we may improve and enhance your experience on our Site or TransUnion Mobile. We may provide such information collected to outside vendors located within or outside Hong Kong SAR for such purposes. No personal information is stored in cookies. It is possible for you not to accept our cookies while using our Site or TransUnion Mobile by setting the preference in your web browser. If you do so, you may not be able to apply for credit reports online but you can still visit the pages in our Site or TransUnion Mobile. If you would like more information about cookies, you can visit http://www.cookiecentral.com/n_cookie_faq.htm. TransUnion uses two different types of cookies. One type of cookie is used so that our Site or TransUnion Mobile "recognizes" you each time you return using the same computer, and you do not have to re-enter all your personal information on each visit. You can set your web browser to refuse to accept this cookie, or delete this type of cookie from your hard drive, and still access our products and services, as long as you re-enter information each time you visit. The second type of cookie is needed so that we can process each step of your transactions with us. If you refuse to accept this type of cookie, you will not be able to access our products and services. Most web browsers automatically delete this type of cookie when you terminate your session;

- (ii) We may use third-party advertising companies inside and outside of Hong Kong to serve ads on our Site or TransUnion Mobile or on other sites or TransUnion Mobile which we use for advertising. These companies may employ cookies and action tags (also known as single pixel gifs or web beacons) to measure advertising effectiveness; and they are not authorized to use the information we share with them for any other purpose. Any information that these third parties collect via cookies and action tags is completely anonymous. In the event you indicate that you want to receive offers from TransUnion, your information may be used to serve relevant ads to you when you visit the Site or use TransUnion Mobile and to send you personalized offers. If you would like more information about this practice and your choices, [click here](#);
- (iii) We may use Google Analytics or other similar analytical tools to obtain information collected in order to display, optimize and personalize advertisements and customer experience on our web properties that are designed to bring visitors to our Site or TransUnion Mobile, to determine which advertisements you may find useful, and to personalize your experience on our Site, TransUnion Mobile and web properties. We may also use this information to segment, enhance or modify our advertisements and to personalize your experience;
- (iv) Anonymous Data. In order to enhance the usefulness of our Site, TransUnion Mobile and our products and services, TransUnion will collect data about our customers' use of our Site or TransUnion Mobile, in a manner that does not include any personally identifiable information. While you browse the our Site or use TransUnion Mobile, we note which pages of our Site or TransUnion Mobile you visit and note the IP address of your computer (as all web sites do automatically), but we do not link that address information to your personal information. The general information we gather enables us to serve our customers better by continually enhancing our Site or TransUnion Mobile based on up-to-date use patterns. We are provided anonymous information collected from other web sites on which we display advertisements that enables us to understand how visitors to our Site or TransUnion Mobile, who were exposed to ads we have placed on those other web sites, interact with our Site or TransUnion Mobile. We may use this information to enhance or modify our campaigns that are designed to bring web visitors to our Site or TransUnion Mobile. You may opt-out of this anonymous data collection and sharing activity by visiting the Google Analytics Privacy Overview web page and following the procedures noted under the Browser Opt-Out and Privacy Center information sections (search for these sites through www.google.com); and/or
- (v) Behavioral Data. Behavioral data is one of the information which TransUnion will use to serve you with personalized offers of TransUnion and our trusted partners. This data includes your interaction with our products and services in our Site, TransUnion Mobile, including but not limited to information searched, transaction conducted, purchase history etc. The information TransUnion gathers is to enhance the relevancy of the personalized offers.

All these data will be kept in our secure server and no Personal Data will be transferred to any third parties.

2. Use and Disclosure of Your Personal Information

- 2.1 We limit our use of consumers' personal information to those purposes which have been disclosed to consumers by our members, or for purposes which are otherwise permitted by the laws. We disclose personal information in compliance with the law primarily by means of Credit Reports to both consumer and members. Specifically, we use and disclose personal information in the following circumstances:
 - (a) to provide our consumer credit reporting services and other related services to our members; or
 - (b) to provide consumer credit information directly to consumers who have requested a copy of their Credit Reports, or to provide related services to consumers.
- 2.2 We may use information about your subscription of our service/ products, such as your usage patterns, to customize your web site and/or customer service experience.
- 2.3 As a service to you, we will use your email address to provide you a receipt of your purchase. Some of our subscription products, such as TransUnion Credit Watch, may include alert emails or other informational emails that are sent on a daily, weekly or monthly basis. These emails are part of the subscription benefits and cannot be disabled for persons who are subscribers of these products.
- 2.4 We may provide anonymous information (i.e., information that does not identify individual consumers) in the form of aggregate, geographic or demographic data to our members, customers or service providers.
- 2.5 We may share information without personal identifiers with third parties engaged to assist us in providing services and information to our members. These service providers are prohibited from using your personal information for any purpose other than to provide this assistance and are required to protect personal information disclosed by us and to comply with the general privacy principles described in this Privacy Policy. Some of these service providers are located outside of Hong Kong. As a result, your personal information may also be subject to applicable local laws, which may be different from Hong Kong laws.
- 2.6 We may disclose your personal information to third parties in the good faith belief that such action is necessary in order to comply with, or be responsive to, legal process served on us (such as a subpoena or court warrant), or if we believe such disclosure is necessary to protect and defend the rights, property or safety of TransUnion, our users or others.
- 2.7 We may disclose your personal information to consultants, agents and advisors, such as attorneys and accountants, in the good faith belief that such disclosure is within the scope of their professional duties to TransUnion and with the understanding that such professionals will abide by our security and confidentiality policies.

3. Direct Marketing

3.1 We will use your information for the direct marketing purpose only if you give your consent to us. You may sign up for our free newsletter or personalised offers in a variety of ways. On our application form, you may leave the opt-out box blank with your signature or you may opt-in during the online ordering process by ticking the opt-in box that states,

"Please send me helpful tips & news about my service, including special offers from TransUnion and trusted partners!"

"TransUnion may use and transfer my personal information to its authorized agent in or outside Hong Kong for direct marketing of TransUnion's credit management products or services including but not limited to marketing materials, special offers, discounts, and free credit tips!"

After the completion of your order, you shall be asked to provide us with the consent for Personalised Offer by pressing the button of "AGREE & CONTINUE":-

"... .. you agree to:-

(a)

(b) authorize TransUnion to access, use, process and analyze your personal information provided by you, Internet Information and all or part of your consumer credit data which may be held in our database from time to time to provide you personalized offers of TransUnion and our trusted partners."

3.2 If you decide to receive our tips and news, special offers or personalized offers from us and our trusted partners, TransUnion may use your personal information, including your name, contact details, products and other service portfolio information, transaction pattern and behaviour, financial background and demographic data held by us from time to time, to contact you and to transfer them to our authorized agent in or outside Hong Kong for direct marketing of TransUnion's credit management products or services including but not limited to marketing materials, personalized offers, special offers, discounts, and free credit tips which include the following classes of products, services and subjects: (a) financial, insurance, credit card, banking and related products and services; (b) reward, loyalty, co-branding or privileges programmes and related products and services; (c) products and services offered by our co-branding/ trusted partners; and (d) donations and contributions for charitable and/or non-profit making purposes.

3.3 The aforementioned products, services and subjects may be provided by or (in the case of donations and contributions) solicited by us and/or: (a) any affiliates of TransUnion; (b) third party financial institutions, insurers, credit card companies, securities and investment services providers; (c) third party reward, loyalty, co-branding or privileges programme providers; (d) co-branding/ trusted partners of ours or any affiliates of TransUnion; and (e) charitable or non-profit making organisations.

3.4 TransUnion may carry out "matching procedures" in Hong Kong or overseas for the marketing purposes described in Clauses 3.2 and 3.3 above.

- 3.5 TransUnion may, from time to time, engage third parties to provide marketing services on their behalf, and may share your personal information described in Clauses 3.2 and 3.3 above with these third parties for such purposes. In addition to marketing the above products, services and subjects ourselves, we may provide the data described in Clause 3.2 to all or any of the persons described in Clause 3.3 above for use by them in marketing those products, services and subjects, and we require your written consent (which includes an indication of no objection) for that purpose.
- 3.6 In case you no longer want to receive these messages via email or any other means, you may opt-out of receiving the email by responding to the newsletter and asking to be unsubscribed, or calling our customer service department and asking to be taken off the list. If you signed up for our newsletter by selecting the special offers opt-in box during the ordering process, you may unsubscribe through the above two processes. Alternatively, you may go to transunion.hk log-in as a subscriber, click on your "profile" link, go to "My Settings", and de-select the Emails & Special offers opt-in box. In case you want to opt out for personalized offers, you may email us at contact@transunion.hk to cancel your subscriptions.

4. Identification Requirements

- 4.1 In order to process your transactions and provide you with quality customer service, we need your full name and current and/or billing address, your email address (so we can contact you) and, if you purchase one of our products or services, a valid credit card number, your identity card number and certain other personal information, such as your date of birth, address information, employment information, and certain credit card and loan account information. We use such information to verify and authenticate the credit card number and to confirm that the person requesting your personal information or credit report really is you and not an impostor or other person improperly seeking to access your information.
- 4.2 You hereby give your consent to and authorize TransUnion to access all or part of your consumer credit data which may be held in our database from time to time ("**Your Credit Data**") and to:-
- (a) match all or part of Your Credit Data against the information you provided or match against any information you provided with each other; and
 - (b) generate questions directly or indirectly from any or all of the information contained in Your Credit Data whether on its own or in conjunction with other source of information, collect responses to such questions from me and match such responses against any information contained in Your Credit Data,

in order to verify your identity, to use such data or any data arising therefrom for purpose of Identity Manager Solutions which is a solution provided by TransUnion for identity management and related solution.

- 4.3 You may not be able to register, subscribe or purchase the products on our Site or TransUnion Mobile, if you do not agree to give us your consent to verify your identity.

5. Retention of Your Personal Information

- 5.1 TransUnion retains your personal information in our credit information database for as long as necessary to fulfil the purpose(s) for which it was collected and to comply with applicable laws.
- 5.2 All credit reports will be retained in an encrypted format for up to 6 months to enable us to deal with queries. Information provided by non-e-Cert users who have not yet provided supporting documents for account activation purpose will be retained for 61 days. All records pertaining to payment and service order history will be retained by us for 2 years for administrative purposes.

6. Our Safeguarding Practices

- 6.1 We take the protection of personal information seriously. We have adopted procedures to secure storage of personal information and are committed to working with our members to protect the security of personal information during any transfer to or from us. We have also instituted a number of safeguards to identify and help prevent the fraudulent use of personal credit information.
- 6.2 In our Site or TransUnion Mobile, we takes precautions to secure your personal information. If and when we ask you to provide your personal information, we will do so through a Web page that uses the Secure Sockets Layer (SSL) protocol. This protocol provides security for your information by encrypting it as it travels from your computer to our computer. For security purposes we then move all of the personal information that we collect or obtain about you, including your credit report, to an environment on our proprietary network that has controls in place to limit access to and secure the data maintained therein. For more information about our security practices, please review our [Security Policy](#).

7. Access and Correction of Personal Information

- 7.1 You may request a copy of your Credit Report at a fee.
- 7.2 You may correct or update at any time the personal information that you provided and that we maintain on you by accessing our Site or TransUnion Mobile and selecting your "profile" from the Main Navigation.
- 7.3 When gathering personal information, we work with our members to increase their awareness of the importance of providing only personal information that is accurate, complete, and up-to date. However, TransUnion cannot alter the information reported by our members, unless the information is determined to be wrong, incomplete or otherwise inaccurate. If consumers do not agree with the accuracy of the information TransUnion has on file, we have procedures to verify such information and, where appropriate, to amend or correct it. We also have established complaint procedures to address consumer concerns and to appropriately investigate and address inquiries and complaints.
- 7.4 Requests to access or correct your information provided to us can be made by email to contact@transunion.hk or, by calling our Consumer Relations Department at (852) 2577- 1816, or contact us at our office address, Suite 1001, Tower 6, the Gateway, 9 Canton Road, Tsim Sha Tsui, Kowloon, Hong Kong.

8. Links to Third Party Sites

- 8.1 Our Site or TransUnion Mobile may offer links to third party web sites including the Hong Kong Post Office (by use of the e-Cert service) and payment gateways for credit card payment. You should be aware that operators of linked web sites may also collect your personal information (including information generated through the use of cookies) when you link to their web sites.
- 8.2 TransUnion is not responsible for how such parties collect, use or disclose your information and it is important for you to familiarize yourself with their privacy policies before providing them with your personal information.

9. Policy Regarding Children

We define children as individuals under the age of 16. Our Site or TransUnion Mobile is not intended for the use of children and we do not intend to collect information about children through our Site or TransUnion Mobile. You must be at least 18 to access any products through our Site or TransUnion Mobile or become a subscriber of any subscription program entitled to subscription benefits.

10. Changes to this Privacy Policy

TransUnion reserves the right to modify this Privacy Policy including the Online Privacy Statement at any time without notice. The Privacy Policy posted at any time via our Site or TransUnion Mobile shall be deemed to be the Privacy Policy then in effect.

11. Possible Acquisition

In the event of an acquisition of all or part of TransUnion by another company, or in the event that TransUnion were to sell or dispose of all or a part of the business, the acquirer would have access to the information maintained by the TransUnion business, which could include your personal information, subject to applicable law. The acquirer's privacy policy might be different than TransUnion's privacy policy, or the acquirer might choose to amend TransUnion's privacy policy. You will be notified by email if, as a result of such acquisition, the privacy policy is materially changed or if the acquirer's privacy policy is materially different than TransUnion's privacy policy. In connection with such notice, you will be given an opportunity to inform the acquirer that you do not consent to the use or disclosure by the acquirer of your personal information in accordance with such new or revised privacy policy.