

## **Personal Data Protection Policy and Practices (“the Policy”)**

*Last updated on 29th March 2023*

MediConCen Limited (“the Company”) is committed to implementation and compliance with the provisions in regard to the collection, holding, processing, use and/ or transfer of personal data under the Personal Data (Privacy) Ordinance (Cap. 486) (“the Ordinance”) Personal data will be collected only for lawful and relevant purposes. The Company will take all practicable steps to ensure security of the personal data and to avoid unauthorised or accidental access, erasure or other use.

When you sign up for or use MediConCen's mobile applications ("mobile applications") and/or MediConCen’s website (“website”), you need to confirm that you have read and agreed to the Policy. By doing so, you consent to the collection, use and disclosure of Your Personal Data and other information as set out in this Policy.

This Policy applies to all products and services provided by the Company and sets out how the Company may collect, use and disclose your personal information.

The Company reserves the right, at any time effective upon notice to you, to add to, change, update or modify the Policy.

### **PERSONAL INFORMATION COLLECTION STATEMENT (“PICS”)**

#### **1. Collection of Personal Data**

- 1.1 From time to time, it is necessary for you to supply the Company or agents and representatives acting on its behalf with personal information and particulars in connection with our services and products. If you do not provide us the necessary information and particulars, we may not be able to provide these services and products to you or process your request.
- 1.2 The Company may collect information about the mobile applications, browsers, and devices you use to access our services, which helps the Company provide features like automatic service updates.
- 1.3 The Company may also generate and compile additional personal data using the information and particulars provided by you. All personal data collected, generated and compiled by the Company about you from time to time is collectively referred to the PICS as "Your Personal Data".
- 1.4 As detailed in the PICS, Your Personal Data may also be processed by the

Company's subsidiaries, holding companies, associated or affiliated companies and companies controlled by or under common control with the Company (collectively, "the Group").

## **2. Types of Personal Data Held**

- 2.1 "Your Personal Data " means any information that you provide to us which identifies or can reasonably be used to identify you, including but not limited to your name, email address or other data that can be reasonably linked to such information by MediConCen, such as information we associate with your account.
- 2.2 "Your Personal Data" will also include personal data relating to your dependents, beneficiaries, authorized representatives and other individuals in relation to which you have provided information. If you provide personal data on behalf of any person you confirm that you are either their parent or guardian or you have obtained that person's consent to provide that personal data for use by the Company for the purposes set out in the PICS.
- 2.3 The Company may also collect information including unique identifiers, browser type and settings, device type and settings, operating system, mobile network information including carrier name and application version number. The Company may also collect information about the interaction of your mobile applications, browsers, and devices with our services, including IP address, crash reports, system activity, and the date, time, and referrer URL of your request.
- 2.4 The Company may collect information about you from publicly accessible sources.
- 2.5 The Company may record and keep record(s) of user number, date, type of medical service received and other relevant data fields related to the medical consultation.
- 2.6 The Company may request medical service providers to provide relevant certificate or other document to ensure that they are duly qualified.

## **3. Purpose of Personal Data Collection**

- 3.1 The Company will use Your Personal Data only for the purpose for which it was provided, as well as other purposes for which you have given consent. This includes, but is not limited to, the following purposes:
  - i. providing our services and products to you, including administering, maintaining, managing and operating such services and products, which may include, without limitation, insurance, pension, financial and wealth management services and products;
  - ii. processing, assessing and determining any applications or requests made by you in connection with our services or products and maintaining your account with the Company;
  - iii. underwriting of insurance products;

- iv. providing health related advices;
- v. developing insurance and other financial services and products;
- vi. developing and maintaining credit and risk related models;
- vii. processing payment instructions;
- viii. determining any indebtedness owing to or from you, and collecting and recovering any amount owing from you or any person who has provided any security or other undertakings for your liabilities;
- ix. exercising any rights that the Company may have in connection with our services and/or products;
- x. carrying out and/or verifying any eligibility, credit, physical, medical, security, underwriting and/or identity checks in connection with our services and products
- xi. any purposes in connection with any claims made by or against or otherwise involving you in respect of any of our services or products, including making, defending, analysing, investigating, processing, assessing, determining, responding to, resolving or settling such claims;
- xii. performing policy reviews and needs analysis (whether or not on a regular basis);
- xiii. meeting disclosure obligations and other requirements imposed by or for the purposes of any laws, rules, regulations, codes of practice or guidelines (whether applicable in or outside Hong Kong) binding on the Company or any other member of the Group, including making disclosure to any legal, regulatory, governmental, tax, law enforcement or other authorities (including compliance with sanctions laws, the prevention or detection of money laundering, terrorist financing or other unlawful activities) or to any self-regulatory or industry bodies such as federations or associations of insurers;
- xiv. for statistical or actuarial research undertaken by the Company or any member of the Group, including matching of any data held which relates to you from time to time for any of the purposes listed herein;
- xv. for recruitment purposes (in connection with job applications); and
- xvi. fulfilling any other purposes directly related to i to xv above.

#### **4. Transfer of Your Personal Data**

- 4.1 Your Personal Data will be kept confidential, but to facilitate the purposes set out in section 3.1 above, the Company may transfer, disclose, grant access to or share Your Personal Data with the following:

- i. other members of the Group;
  - ii. any person or company carrying on insurance-related and/or reinsurance-related business which is engaged by the Company in connection with the Company's business;
  - iii. any physicians, hospitals, clinics, medical practitioners, loss adjustors, risk intelligence providers, claims investigators, legal advisors and/or other professional advisors engaged in connection with the Company's business;
  - iv. any person (including private investigators) in connection with any claims made by or against or otherwise involving you in respect of any products/services provided by the Company and/or our affiliates;
  - v. any agent, contractor, service provider or third party providing administrative, distribution, credit reference, debt collection, telecommunications, call centre, computer, call centre, data processing, payment processing, printing, redemption or other services in connection with the Company's business;
  - vi. credit reference agencies or, in the event of default, debt collection agencies; and/or
  - vii. any official, regulator, ministry, law enforcement agent or other person (whether within or outside Hong Kong) to whom the Company or another member of the Group is under an obligation or otherwise required or expected to make disclosures under the requirements of any law, rules, regulations, codes of practice or guidelines (whether applicable in or outside Hong Kong).
- 4.2 Your Personal Data may be transferred or disclosed to any assignee, transferee, participant or sub-participant of all or any substantial part of the Company's business.
- 4.3 To facilitate the purposes set out in section 3.1 the Company may transfer, disclose, grant access to or share Your Personal Data with the parties set out in sections 4.1 and 4.2 and you acknowledge that those parties may be based outside Hong Kong and that Your Personal Data may be transferred to places where there may not be in place data protection laws which are substantially similar to, or serve the same purposes as, the Ordinance.
- 4.4 The Company may only transfer Your Personal Data as mentioned above if you consent or do not object in writing or by digital signoff.

## **5. Use of Personal Data in Direct Marketing**

- 5.1 In connection with direct marketing, the Company intends to use your name, contact details, services and products portfolio information, financial background and demographic data held by the Company from time to time in direct marketing to market the following classes of services and products offered by the Company, other members of the Group and/or Our Business Partners (being providers of the product and services described below) from time to time:

- i. insurance services and products;
  - ii. wealth management services and products;
  - iii. pensions, investments, brokering, financial advisory, credit and other financial services and products;
  - iv. health-check, medical and wellness services and products;
  - v. media, entertainment and telecommunications services;
  - vi. reward, loyalty or privileges programmes and related services and products; and
  - vii. donations and contributions for charitable and/or non-profit making purposes.
- 5.2 The Company may only use Your Personal Data in direct marketing as mentioned above if you consent or do not object in writing or by digital signoff.
- 5.3 If you do not wish the Company to use Your Personal Data in direct marketing, you may inform the Chief Executive Officer of the Company in writing to the address below. We will withdraw you from future direct marketing activities.
- 5.4 In addition to marketing the medical services and products directly, the Company intends to provide Your Personal Data to any members of the Group and/or Our Business Partners for their use in direct marketing the classes of services and products described in section 5.1 above (including, in the case of Our Business Partners, for money or other commercial benefit).
- 5.5 If you do not wish the Company to provide Your Personal Data to other members of the Group and/or Our Business Partners for their use in direct marketing, you may write to the Chief Executive Officer of the Company at the address below to opt out from direct marketing at any time.

## **6. Data Access/ Correction Requests**

- 6.1 Under the Ordinance:
- i. you have the right to request access to Your Personal Data held by the Company and correction of any of Your Personal Data which is inaccurate; and
  - ii. the Company has the right to charge you a reasonable fee for processing and complying with your data access request.
- 6.2 Requests for access to or correction of Your Personal Data should be made in writing to the Chief Executive Officer of the Company at the address below.

## **7. Accuracy of Personal Information**

- 7.1 The Company will ensure the accuracy of all personal data collected and processed by the Company. Appropriate procedures are implemented so that all personal data is regularly checked and updated to ensure that it is reasonably accurate having regard to the purposes for which that data is used.
- 7.2 In so far as personal data held by the Company consists of statements of opinion, all reasonably practicable steps are taken to ensure that any facts cited in support of such statements of opinion are correct.
- 7.3 The Company will at all times endeavour to ensure the accuracy of personal data held by the Company, and if such personal data is transferred to third parties, it will notify that third party of any correction to be made.

## 8. **Retention of Personal Information**

- 8.1 No personal data is kept for longer than is necessary and that the Company will comply with all statutory and regulatory requirements in the Hong Kong Special Administrative Region concerning the retention of personally identifiable information.
- 8.2 For the Company's mobile applications, membership registration data of data subject will be deleted within 2 years after termination of membership of the App.

## 9. **Location Information**

- 9.1 We collect information about your location when you use our services, which helps us offer features such as searching clinics near you. Your location can be determined with varying degree of accuracy by GPS. The types of location data that we collect depend in part on your device and account setting.

## 10. **Data Security**

- 10.1 The Company will ensure an appropriate level of protection for personal data in order to prevent unauthorized access, processing or other use of that data, commensurate with the sensitivity of the data and the harm that would be caused by unauthorized access to that data. It is the practice of the Company to achieve appropriate levels of security by restricting physical access to data, providing secure storage facilities and incorporating security measures into equipment in which data is held.
- 10.2 Measures are taken to ensure the integrity, prudence, and competence of persons having access to personal data and personal data is only transmitted by secure means.
- 10.3 In addition, the Company takes prudent security measures to ensure personal data collected via the mobile applications are stored and transmitted under protection:
  - i. For mobile app development, the mobile applications is developed by secure coding and penetration testing is conducted;

- ii. The personal data collected via the mobile applications is stored in a database with strict access control;
- iii. Data transfers between the Company and the mobile applications are made in SSL secured connection and valid session key management is in place to ensure unauthorized access is restricted and prevented; and
- iv. A multi-layered defense system is used in the Company's data centre to secure transmission and ensure effective data protection is in place.

## **11. Use of Cookies and Third-Party Links**

- 11.1 The Company's website may include hyperlinks to third party websites. The Company has no control over the content, accuracy, opinion expressed, and other links provided at these third -party websites or how these third-party websites deal with Your Personal Data. You should investigate the privacy policies on these third-party sites.
- 11.2 The Company may use "cookies" to improve our internet service to you. Cookies are small data files that are automatically stored on your web browser in your computer that can be retrieved by the Company's website. Cookies enable the Company's website to remember you and your preferences when you visit the website and enable us to tailor the website to your needs. The information collected by cookies is anonymous visitor's personalized settings information and contains no name or address information or any information that will enable anyone to contact you via telephone, e-mail or any other means. No customer personal data is stored in cookies. However, you can disable cookies by changing the settings of your web browser.
- 11.3 In relation to the service of our website and mobile application, we may employ third party companies and individuals to facilitate such service, provide on our behalf, perform related service or/and to assist the analysis of usage, of such service. The said third party have access to your personal information only to perform such task on our behalf and are obligated not to disclose or use it for any other purpose. The said third party companies and individuals we employed include but not limited to Google Analytics.

### **Google Analytics**

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network.

You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on

prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity.

For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <http://www.google.com/intl/en/policies/privacy/>

## **12. Online Job Applications**

- 12.1 Making an online application to a job advertisement on the Company's website is a free and optional service that requires user to complete mandatory fields (including but not limited to the applicant's first name, last name, email and resume) so that the Company can identify and contact the applicant. When you apply for a job application on our website, the application, including the attachments and cover letters are stored in the Company's database to allow easy and effective management of the recruitment process.
- 12.2 Any personal information retained by the Company as part of your application will only be used in accordance with this Policy.

## **13. Miscellaneous**

- 13.1 In case of discrepancies between the English and Chinese versions, the English version shall apply and prevail.
- 13.2 By accepting this Policy, you consent to the transfer of Your Personal Data outside Hong Kong and you understand Your Personal Data may not be protected to the same or similar level in Hong Kong.
- 13.3 Further enquiries regarding the Company's Personal Data Protection Policy and Practices may be directed to:

Chief Executive Officer  
MediConCen Limited

Units 1501-02, 15/F, Port 33, 33 Tseuk Luk Street, San Po Kong, Kowloon, Hong  
Kong

Email: [info@mediconcen.com](mailto:info@mediconcen.com)



## 個人資料保護政策及執行（簡稱「本政策」）

版本日期：2019年3月15日

醫結有限公司（「本公司」）致力執行及遵守在《個人資料（私隱）條例》（香港法例第486章）（「條例」）中有關收集、持有、處理、使用和/或轉移個人資料之內容。個人資料只會就合法和相關目的而收集。本公司將採取一切切實可行的措施確保個人資料的安全，並避免未經授權或意外的存取、刪除或其他用途。

當您註冊或使用本公司的手機應用程式（「手機應用程式」）及/或本公司的網站（「網站」）時，您須確認您已閱讀並同意本政策。通過這樣做，您同意本公司按本政策的規定，收集、使用和披露（據第五條的定義所指）您的個人資料和其他信息。

本政策適用於本公司提供的所有產品及服務，並列明本公司如何收集、使用及披露閣下的個人資料。

本公司保留隨時增補、更改、更新及修訂本聲明之權利，任何更改將於發出通知時起生效。

### 收集個人資料聲明（「本聲明」）

#### **1. 收集個人資料**

- 1.1 閣下需要不時向本公司或本公司的代理及代表就本公司的服務及產品提供個人資料及詳情。如您未能提供所需資料及詳情，我們可能無法向閣下提供所關的服務及產品，或無法處理閣下的要求。
- 1.2 本公司可能會收集您用來使用本公司服務手機應用程式、瀏覽器及裝置的資料，以協助本公司提供自動服務更新等功能。
- 1.3 本公司亦可能使用閣下提供的資料及詳情製作及匯編額外的個人資料。本公司不時收集、製作及匯編的所有個人資料，以下統稱為「閣下的個人資料」。
- 1.4 如本聲明所述，本公司的附屬公司、控股公司、聯營或聯屬公司或本公司控制的公司或與本公司受共同控制的公司（統稱「本集團」）亦可處理閣下的個人資料。

#### **2. 持有個人資料的種類**

- 2.1 「閣下的個人資料」包括所有您提供給本公司可以識別或合理地識別您個人身份的資料，這包括但不限於您的名字、電郵地址或其他本公司可以與此類信息作出合理聯繫的其他數據，例如與您的帳戶相關聯的資料。

- 2.2 「閣下的個人資料」亦包括由閣下提供有關閣下的受養人、受益人、獲授權代表及其他人士的資料。如閣下代表他人提供個人資料，閣下確認閣下乃是他們的父母或監護人或閣下已取得有關人士之同意提供有關人士之個人資料予本公司作本聲明之用途。
- 2.3 本公司可能收集有關唯一識別碼、瀏覽器類型和設置、裝置類型和設置、操作系統和移動網絡，包括運營商名稱和程式版本編號的資料。本公司亦可能收集有關您的手機應用程式、瀏覽器和裝置與本公司的交互的信息，包括網際網路協定位址、當機報告、系統活動以及您請求的日期、時間和參照網址。
- 2.4 本公司亦可能會從公眾可到訪的來源收集有關您的資料。
- 2.5 本公司會紀錄並保存用戶號碼、日期及醫療服務類型的記錄，以及其他與醫療診證相關資料欄。
- 2.6 本公司可要求醫療保健從業者提供相關證書，以確保他們為合資格。

### 3. 收集個人資料的目的

- 3.1 本公司只會將閣下的個人資料作所述的目的，以及其他徵得閣下同意的目的。這包括但不限於以下的目的：
- i. 向閣下提供本公司的服務及產品包括管理、維持、處理及運作有關服務及產品，當中包括但不限於保險、退休金、金融及財富管理的服務及產品；
  - ii. 處理、評估及決定閣下就本公司的服務或產品而提出的任何申請或要求，以及維持閣下在本公司的帳戶；
  - iii. 核保保險產品；
  - iv. 提供健康相關建議；
  - v. 發展保險及其他金融服務及產品；
  - vi. 發展及維持本公司信貸及風險之相關模型；
  - vii. 處理付款指示；
  - viii. 釐訂任何欠付閣下或閣下所欠的負債，及向閣下或任何為閣下的債務提供擔保或其他承諾的人士收取及追討欠款；
  - ix. 行使與本公司的服務及／或產品有關的任何權利；
  - x. 就本公司之服務及產品作出資格、信貸、身體、醫療、擔保、承保及／或身份核証；

- xi. 用於任何因本公司的產品或服務而由閣下提出或本公司對閣下提出的申索，包括作出、分析、調查、處理、評核、決定、回應或解決有關申索，亦包括就有關申索提出抗辯或達成和解。
- xii. 保單審閱及需求分析（不論定期與否）；
- xiii. 本公司或本集團的其他成員根據任何法律、規則、規例、實務守則或指引（不論在香港境內或境外適用）要求而須披露閣下的個人資料，包括向任何法定機構、監管機構、政府機構、稅務機構、執法機構或其他機構（包括為遵守制裁法、避免或偵查洗錢、恐怖分子資金籌集或其他不法活動）或向任何獨立監管或行業團體（如保險業聯會或協會等）披露閣下的個人資料；
- xiv. 作本公司或本集團的任何成員的統計或精算研究，包括不時就本條款所列的任何目的核對所持有的與閣下有關的任何資料；
- xv. 作招聘用途（有關工作申請）及
- xvi. 履行與上文 i 至 xv 直接有關的其他用途。

#### 4. 個人資料的轉移

4.1 閣下的個人資料將予以保密，但為達成上文第 3.1 部分列出的用途，本公司可能向以下各方轉移或披露閣下的個人資料，亦可能讓其查閱或與其共同使用閣下的個人資料：

- i. 本集團的其他成員；
- ii. 任何與本公司業務有連繫、經營保險相關及／或再保險相關業務之人士或公司；
- iii. 任何與本公司業務有連繫的治療師、醫院、診所、醫生、損失理算人、風險情報供應商、索賠調查人、法律顧問及/或其他專業顧問；
- iv. 任何人（包括私人調查員）就本公司及/或我們的聯屬公司提供的任何產品/服務而由您作出的或針對您的或以其他方式涉及您的任何申索；
- v. 任何向本公司之業務提供行政、分銷、信貸資料庫、債務追討、電訊、電腦、熱線中心、資料處理、付款處理、印刷、贖回或其他服務的代理人、承包商或服務供應商；
- vi. 信貸參考機構，或在違約的情況下，收債公司；和/或
- vii. 任何本公司或本集團的其他成員負有責任或需要或預期要根據任何法律、規則、規例、實務守則或指引（不論在香港境內或境外適用）向其披露個人資料的官員、規管者、部門、執法代理或其他人士（不論在香港境內或境外）。

- 4.2 本公司可能將閣下的個人資料可能轉移或披露予任何承讓人、受讓人、本公司業務的任何實質部分的參與人或次參與人。

為達成本聲明第 3.1 部分所列出的目的，本公司將向本聲明第 4.1 及 4.2 部分所列的各方轉移或披露閣下的個人資料，亦將讓其查閱或與其共同使用閣下的個人資料。閣下就此知悉有關一方可能設在香港以外的地方，並知悉閣下的個人資料可能遭轉移至一個並未設有與條例大致相同或用作同一用途的資料保護法的地方。

- 4.3 本公司只可在閣下作出書面或電子許可形式同意或不反對的情況下將閣下的個人資料提供予其他人士或公司作其直接促銷用途。

## 5. 將個人資料用於直接促銷用途

- 5.1 就直接促銷而言，本公司擬使用本公司不時持有的閣下姓名、聯絡資料、服務及產品組合資料、財務背景及人口統計資料作直接促銷用途；銷售本公司、本集團其他成員及／或本公司之業務夥伴（即以下產品及服務的供應商）不時提供的下列服務及產品：

- i. 保險服務及產品；
- ii. 財富管理服務及產品；
- iii. 退休金、投資、經紀、財務諮詢、信貸及其他金融服務及產品；
- iv. 健康檢查及醫療健康服務及產品；
- v. 媒體、娛樂及電信服務；
- vi. 獎賞、客戶忠誠或優惠計劃及相關服務及產品；及
- vii. 為慈善及／或非牟利用途的捐款及捐贈。

- 5.2 本公司只可在閣下作出書面或電子許可形式同意或不反對的情況下使用閣下的個人資料作直接促銷用途。

- 5.3 若閣下不希望本公司使用閣下的個人資料，閣下可通知本公司的行政總裁並致函至以下地址。本公司會撤銷閣下於日後的直接促銷活動。

- 5.4 除直接促銷醫療服務及產品外，本公司擬將閣下的姓名及聯絡資料提供予本集團任何成員及／或本公司之業務夥伴，讓其直接促銷上文第 5.1 部分所載的服務或產品（如為業務夥伴，則包括向其提供個人資料以獲取金錢或其他商業利益）。

- 5.5 若閣下不希望本公司將閣下的個人資料提供予本集團的其他成員及／或本公司的業務夥伴作直接促銷用途，閣下可隨時致函本公司的行政總裁並將函件郵寄至以下地址，藉以拒絕直接促銷。

## 6. 查閱/改正資料的要求

- 6.1 根據條例:
- i. 閣下有權要求查閱本公司持有閣下的個人資料，並要求改正閣下的不正確個人資料; 及
  - ii. 本公司有權就處理及遵行閣下的查閱資料要求收取合理費用。
- 6.2 查閱或改正閣下的個人資料的要求，應以書面形式向本公司的行政總裁提出並將函件郵寄至以下地址。

## 7. 確保個人資料準確

- 7.1 本公司會確保其收集及處理之個人資料準確無誤。本公司已執行適當程序以定期核對及更新所有個人資料，以確保有關資料就使用目的而言是合理準確。若本公司所持有之個人資料載有意見陳述，本公司將採取所有合理可行之步驟，確保任何引用支持該等意見陳述之事實正確無誤。本公司會時刻致力確保其所持有之個人資料準確無誤。若此等個人資料被轉交予第三方，本公司將會知會該第三方作出之有關修正。

## 8. 保留個人資料

- 8.1 任何個人資料的保存期間不會超過所需期限，且本公司將遵守香港特別行政區有關保存個人身份資料的所有法例及監管規定。
- 8.2 有關本公司的手機應用程式，資料當事人的會員登記資料將會在其於該應用程式的會員賬戶終止後 2 年內刪除。

## 9. 位置資訊

- 9.1 本公司會在您使用本公司的服務時收集有關您所在位置的資料，這有助於我們提供搜索附近診所等的功能。您可以通過全球定位系統以不同的準確度確定您的位置。我們收集的位置數據類型部分取決於您的裝置和帳戶設置。

## 10. 資料安全

- 10.1 本公司的政策為確保個人資料的保安，會因應資料的敏感程度及擅自查閱資料所造成的損害程度提供適度的保障，以防止資料被擅自查閱、處理或作其他用途。為達到適當程度的保安，本公司的一貫做法為提供安全的儲存設施及在資料存置設備實施保安措施，以嚴格限制資料被查閱。
- 10.2 本公司亦會採取措施以確保處理該等資料的人士具備良好操守、審慎態度及辦事能力，以及資料只會以妥善保安的方式傳送。
- 10.3 本公司亦採取審慎的措施以確保透過該應用程式收集的個人資料在獲保護的情況下儲存及傳輸：

- i. 在流動應用程式開發方面，該應用程式是以安全編碼開發，並會每年經由第三方專業資安團隊進行滲透測試；
- ii. 透過該應用程式收集的個人資料被儲存於受到加密保護及具嚴格查閱管制的資料庫內；
- iii. 本公司與該應用程式之間的資料傳送乃使用 SSL 通訊加密進行的，並已設置有效的對話密碼匙(session key)管理，以限制及防止未獲准許的查閱；和
- iv. 本公司的數據中心採用多層防禦機制以保護資料輸送及確保資料獲得有效的保護。

## 11. 使用 Cookies 及第三方連結

11.1 本公司網站可能載有第三方網站的超連結。本公司未能控制該等第三方網站提供之內容、發表之意見、其提供之連結或對該等第三方網站處理閣下個人資料之方式。閣下應瀏覽第三方網站的私隱政策。

11.2 本公司可能使用“Cookies”，以改善我們向閣下提供的互聯網服務。Cookies 是載有小量資料的檔案，自動儲存於閣下電腦的網頁瀏覽器中，並可供本網站日後檢索。當閣下瀏覽本網站時，Cookies 能讓本公司網站記下閣下及閣下的偏好設定，進而讓本公司能根據閣下的需求制定網站內容。Cookies 收集的資料是不記名的個人化設置資料，當中並不載有姓名、地址或其他可使他人透過電話、電子郵件或其他方式聯絡閣下的資料。Cookies 並不保存客戶的個人資料。然而，閣下可以自行更改網頁瀏覽器設置以停用 Cookies。就提供應用程式及網頁的服務而言，我們或會聘請第三方的公司或個人以促進、代理、提供相關服務或／及就該服務作使用者分析。第三方所獲得閣下的個人資料將只能為我們提供指定工作，而他們將有責任保密及不能將此個人資料作其他用途。上述第三方的公司或個人包括但不限於 Google Analytics (分析)。

### Google Analytics (分析)

Google Analytics (分析) 為由谷歌提供作追蹤及報告網頁流量的網絡分析服務。谷歌收集的數據將用於以追蹤及監察我們提供我們的服務。這些數據將與其他谷歌服務共用。谷歌將以這些收集而得的數據以脈絡化及個人化其廣告網絡的廣告。閣下如選擇退出上述將閣下使用服務時活動紀錄與 Google Analytics (分析)共用的安排，閣下可安裝 Google Analytics (分析)選擇退出瀏覽器附加設備。附加設備將避免 Google Analytics JavaScript (ga.js, analytics.js, and dc.js) 分享瀏覽活動予 Google Analytics (分析)。如欲了解更多谷歌的私隱政策，請瀏覽谷歌私隱及條款頁面：<http://www.google.com/intl/en/policies/privacy>

## 12. 網上職位申請

- 12.1 就於本公司網站刊登的招聘廣告作出網上申請為免費及非強制的服務。該項服務要求用戶填妥必填的項目（包括但不限於申請人的姓名、電郵地址及履歷表），以供本公司識辨及聯絡申請人。當您於本公司網站申請職位，該項申請，包括其附件及求職信將存於本公司資料庫，令招聘過程更加輕鬆及有效率。本公司將會根據本政策使用任何就您的申請而保留的個人資料。

### 13. 其他

- 13.1 中英文本如有歧異，概以英文本為準。
- 13.2 接受本政策亦代表閣下同意把閣下的個人資料轉移至香港境外，並明白閣下的個人資料未必可以獲得與在香港相同或類似程度的保障。

有關本公司個人資料保護政策及執行之進一步諮詢，可聯絡以下人士：

行政總裁

醫結有限公司

香港九龍新蒲崗爵祿街 33 號 15 樓 1501-02 室

電郵：[info@mediconcen.com](mailto:info@mediconcen.com)