

The Hong Kong Association of the Order of Malta Data Privacy Policy Statement

updated 28 May 2020

Statement of Policy

The Hong Kong Association of the Order of Malta Limited (the “Association”) respects the personal data privacy of all individuals and pledges to be in compliance with the requirements of the Personal Data (Privacy) Ordinance (“PDPO”) “Chapter 486 of the Laws” of Hong Kong so that the privacy of your personal data is protected in accordance with the standards required by law. In doing so, we require all our staff, members and agents to comply with the PDPO in the same manner as the PDPO applies to the Association as a whole and adhere to strict standards of security and confidentiality.

Statement of Practice

1. Kinds of personal data held

The following explains the types of records / personal data held by the Association.

(a) Personnel records, which include but not limited to job applications, members and non-members files (containing personal details, job particulars, details of education, religious background etc.), training records, participation records, information about dependents and affiliates necessary for administrative and operational activities;

(b) Records of guests, members and volunteers which include but not limited to various Association related applications and operations (such as for enrolment in courses, programs or activities run by the Association; grants, loans or other assistance by the Association; and accommodation arranged by the Association, etc.) which contain guests, members and volunteers personal details, administrative records (such as payments, charges and fines, spiritual information, etc.), activity records (such as sponsorship, volunteer activities, and other societal participation, and so on);

(c) Records collected from the Association’s website / intranet, which include but not limited to records containing email addresses and personal details, preferences of web-users, location information (including IP addresses); and

(d) Other records, which include but not limited to administration and operational files, records holding personal data provided to the Association from associates of the Association, individuals participating in activities organized or run by the Association (including promotional, educational, or training activities), log records on the use of data facilities, services, or participation in activities, records of requests to access / correct personal data and enquiries from the public, research findings and related publications.

2. Main purposes of collecting and keeping personal data

Personal data will only be used for the purposes stated at the time the data is collected, which broadly speaking, volunteering, training/teaching, charity, research, and related activities that are consistent with the Association’s mission (which is to uphold human dignity and caring for people in need through its medical, social and humanitarian works, regardless of their race, religion or political persuasion.). However, specific purposes will vary depending on the nature of the personal data held.

Examples of specific purposes are explained further below.

Personal data held in:

(a) Personnel records are collected and kept for corresponding with staff, recruitment and human

resources management purposes including but not limited to obtaining reference checks, maintaining employee records and assessing work performance, consideration for eligibility for staff benefits, training and development, emergency purposes, and organizing charitable and other activities and events;

(b) Records of members, volunteers and guests are collected and kept for purposes including but not limited to facilitating communications between the Association and its members and volunteers, facilitating the provision of information upon request by members and volunteers in relation to their affairs at the Association (such as requests for educational background, skills and years of volunteering experience), compiling statistics on enrolment at the Association, facilitate program and event planning and management, and organizing charitable and other activities and events;

(c) Records collected from the Association's website / intranet are collected and kept for purposes including but not limited to handling various applications submitted through the Association's website / intranet, sending newsletters to subscribers registered through the Association's website, responding to requests submitted through the Association's website / intranet, facilitating website access and compiling statistics on website usage; and

(d) Other records are collected and kept for purposes which vary according to the nature of the record, including purposes such as facilitating administration or office functions, organizing and delivering activities, compiling, summarizing, aggregating and/or de-personalizing personal data in connection with research or statistical/analytical activities carried on by the Association in furtherance of the Association's mission, conducting direct marketing activities (such as communicating information to individuals about the Association's training and charitable programs) in connection with furthering the Association's mission, facilitating publication of events or other publications relating to the Association.

3. Collection of personal data

(a) General: When the Association collects personal data from individuals, the Association will provide them with a Personal Information Collection Statement ("PICS") on or before the collection in an appropriate format and manner in compliance with the PDPO.

(b) Personal data of minors: The PDPO does not impose any additional obligation on data users to seek the express consent of the minor (or his / her parent / guardian) on top of having to disclose the requisite information just because the data subject is a minor. Notwithstanding this, data users are generally not advised to collect personal data from minors (particularly those who are incapable of making an informed decision) without prior consent from a person with parental responsibility of the minor.

There are situations where the Association may need to collect personal data of minors but it may not be practicable to obtain the consent of the parent because, for example:

- the occasion is not one where parents may accompany the minor;
- filling in an online application through the internet which the minor may be able to complete on his / her own, etc.

Under the circumstances, the Association will ask for an indication that the minor has consulted his / her parents before providing the personal data.

(c) Personal data from the Association's website / intranet: In order to provide web-users with a smooth browsing experience, we may need to use technical means (such as cookies) to collect information from web-users when they visit the Association's website / intranet. If you are given the option whether or not to accept cookies and you do not accept, you may not be able to access the full content of our website / intranet.

(d) Direct marketing: Where it is intended that the personal data collected will be used for direct marketing purposes, the Association will provide the individual with all the necessary information required to be given by law such as information about the direct marketing means and the classes of marketing subjects before making the collection. The Association will not use an individual's personal data in direct marketing unless it has obtained the express consent of the individual concerned and such consent has not been withdrawn.

4. Duration of retention of personal data

The Association will only hold personal data for as long as it is necessary to fulfil the purpose or a directly related purpose for which they are collected.

5. Disclosure of personal data

The Association will take all practicable steps to keep the personal data you have provided confidential. However, the Association may need to disclose, transfer or assign personal data collected by it to such outside third-parties to facilitate the purpose for which the personal data was collected. In general, the parties to which we may disclose, transfer or assign personal data include medical practitioners providing medical services to the Association's staff, volunteers and charity beneficiaries if applicable, any agent, contractor or third-party service provider engaged by the Association to provide services to or on behalf of the Association (e.g. bankers, insurance providers and payroll service providers) and any person to whom the Association is under an obligation to make disclosure under any requirements of any law or for the purposes of any guidelines or codes of practice with which the Association is expected to comply. We may also disclose, transfer or assign personal data internally within the Association (on a need-to-know basis) to facilitate the purpose for which the personal data was collected or a directly related purpose. The personal data may be disclosed, transferred or assigned within or outside Hong Kong. In case it is to a place outside Hong Kong, while the Association will take appropriate steps to protect the privacy of the personal data, it should be noted that such place may not have in place data protection laws which are substantially similar to, or serve the same purposes as, the PDPO so personal data located outside Hong Kong may not be protected to the same or similar level as in Hong Kong.

6. Security of personal data

The Association will take appropriate steps to protect the personal data held by it against unauthorized or accidental access use, loss, processing, erasure, transmission, modification or disclosure. When the Association needs to disclose, transfer or assign personal data to outside third-parties, the Association will take appropriate steps to protect the privacy of the personal data to be disclosed, transferred or assigned (for example, requiring our service providers to keep confidential any personal data with which it comes into contact).

7. Personal data access and correction

Individuals have the right to request access to and to correct their personal data held by the Association.

Personal data may be made available to concerned individuals via different means, including (a) authenticated on-line enquiries and/or (b) sending the request by email to info@orderofmalta.org.hk.

Similarly, requests to correct personal data held by the Association may be made via on-line functions where available and/or by submitting such requests by email to info@orderofmalta.org.hk, using prescribed forms provided by concerned offices.

In accordance with the Personal Data (Privacy) Ordinance, data access requests will normally be addressed within a 40-day period. A fee reflecting the cost of processing the data request may be levied.



ORDER OF MALTA
Hong Kong

8. Enquiries

Any enquiries regarding personal data privacy policy and practice may be addressed to the Association's Office Bearers and email to info@orderofmalta.org.hk.