

## **Personal Information Collection Statement**

We, CITIZEN Watches (H.K.) Ltd. (hereinafter referred as “**Company**”), part of the Citizen Group, pledges to meet fully with the requirements of the Personal Data (Privacy) Ordinance, Chapter 486 of the Laws of Hong Kong (“**Ordinance**”).

This Personal Information Collection Statement (“**PICS**”) is made in accordance with the Ordinance and the guidelines issued by the Privacy Commissioner for Personal Data. This PICS sets out the purposes for which your personal data will be used following their collection, what you are agreeing to with respect to the use of your personal data by the Company and your rights under the Ordinance.

### **1. Use of Personal Data**

1.1. We on different occasions collect personal data that we believe to be relevant and necessary to conduct our business with you. In general, the provision of your personal data is voluntary. With respect to the provision of certain products and/or services, we may require you to fill in forms and it is mandatory for you to provide all the personal data as requested in such forms unless any of them is marked as “optional”. Failure to supply any of the mandatory personal data may result in Company being unable to provide or continue to provide products and services to you.

1.2. Personal data collected by us may be used for any of the following purposes (collectively, the “**Purposes**”):

- (a) for the daily operation of our services provided to customers, offline or online;
- (b) providing customers with after-sale services (such as for warranty and related services);
- (c) identifying customers who have enjoyed and used our services provided;
- (d) providing customers with marketing and promotional materials for their enjoyment of benefits provided by the Company;
- (e) identifying customers who have enjoyed their benefits as customers by receiving and using marketing and promotional materials;
- (f) allowing customers to enjoy their benefits by enrolling for promotional events hosted by the Company and/or its affiliates;
- (g) conducting satisfaction surveys with customers and market analysis;
- (h) addressing requests or enquiries made by customers;
- (i) designing and providing products and services to customers in relation to the above purposes;
- (j) facilitating the Company and/ or its affiliates to investigate any disputes (or any potential disputes or claims) arising out of or associated with a required or recommended service provided (or to be provided) by the Company;
- (k) enabling the Company to monitor the quality of services provided by its staff and carry out corresponding internal training and/ or disciplinary action where appropriate;
- (l) notifying you of any changes to the Websites or to our services that may affect you;
- (m) complying with the applicable laws of any jurisdiction; and

(n) any other purposes incidental and directly related to any of the above.

- 1.3. We may also use data that we collect on an aggregate or anonymous basis (such that it does not identify any individual customers) for various business purposes, where permissible under applicable laws and regulations.
- 1.4. The Company will not be entitled to use your personal data for any purposes other than the purposes stated above without your express and informed consent in writing.

## **2. Disclose or Transfer of Personal Data**

- 2.1. The Company agrees to take all practicable steps to keep your personal data collected confidential and/or undisclosed, subject to the following.
- 2.2. Generally speaking, the Company will only disclose and/or transfer your personal data to the Company's staff for the purpose of providing our services to you. However, the Company may disclose and/or transfer such personal data to third parties under the following circumstances:
  - (a) where the personal data is disclosed and/or transferred to the Company, any third-party suppliers or external service providers who have been duly authorized by the Company to use such personal data and who will facilitate our services, such as warranty and after-sale services provided by the Company and/or its affiliates, under a duty of confidentiality;
  - (b) where the personal data is disclosed and/or transferred to any agents or affiliates of the Company including its regional offices who have been duly authorized by the Company to use such personal data;
  - (c) where the Company needs to protect and defend its rights and property;
  - (d) where the Company considers necessary to do so in order to comply with the applicable laws and regulations, including without limitation compliance with a judicial proceeding, court order, or legal process served on the Company and/or its affiliates; and
  - (e) where the Company deems necessary in order to maintain and improve the services provided by the Company.
- 2.3. Personal Data collected by the Company may be transferred, stored and processed in any country/region in which the Company and/or its affiliates operate. By using our services, you are deemed to have agreed to, consented to and authorized the Company to disclose and/or transfer your personal data under the circumstances stated above, as well as to any transfer, disclosure and use of personal data outside of your country/region.

## **3. Direct Marketing**

- 3.1. The Company intends to use your personal data for direct marketing, and for such purpose, your personal data held by the Company may be provided to any of our affiliates, subsidiaries or associated companies for their use for direct marketing. The intended kinds of personal data to be used and the intended classes of

marketing subjects are specified in this PICS. However, we will only use your personal data when we have received your consent or where the use is permitted under the Ordinance.

- 3.2. For direct marketing use, the Company or its affiliates, subsidiaries or associated companies intend to use your first name, last name, email address, and contact number(s) through post, email, phone or SMS for the following classes of services and/or products:
  - (a) all products and services related to the services provided by the Company and/or its affiliates;
  - (b) special events hosted by the Company and/or its affiliates for customers, including but not limited to courses, workshops, customer or member events, product launches, lucky draws and competitions;
  - (c) reward, loyalty, membership, club or privilege programmes and related products and services;
  - (d) news and special offers including coupons, discounts, group purchase offers and promotional campaigns.
- 3.3. You are entitled to exercise your opt-out right at any time to request us to cease to use your personal data for direct marketing purpose, despite consent to such use has been previously given. In this regard, you may choose to unsubscribe from such materials by, as the case may be, clicking on the automatic link appearing in each e-newsletter/message and follow the instructions and procedures contained thereunder. You may also unsubscribe from any direct marketing materials by contacting the Customer Service Department of the Company through one of the communication channels set out in the “Enquiries” section below.

#### **4. Right to Data Access and Correction**

- 4.1. You are entitled to request access to, and/or request us to disclose, correct, discontinue to use, or delete any of your personal data in our possession in accordance with the provisions of the Ordinance. We may charge a reasonable fee for the processing of such data access, correction or deletion requests.
- 4.2. To access your personal data, you may use the form specified by the Privacy Commissioner for Personal Data which is accessible from the link (<https://www.pcpd.org.hk/english/publications/files/Dforme.pdf>). Such request should be addressed in writing to the Customer Service Department of the Company through one of the communication channels set out in the “Contact Us” section below.
- 4.3. In the event that you wish to access and/or amend your personal data, the Company may request you to provide personal details in order to verify and confirm your identity. The HKID card number or passport number or business registration certificate number records kept with the Company cannot be amended unless such data is proved to be inaccurate. The Company is required to respond to your requests within 40 days of the request and will endeavour to do

so wherever possible.

## **5. Contact Us**

Any requests for access to and/or correction of your personal data collected, or enquiries regarding this PICS and the Company's Privacy Policy should be addressed in writing to:

By Post:  
Customer Service Department  
2/F, 64 Hung To Road, Kwun Tong, Kowloon

By Email:  
cs\_dept@citizen.com.hk

## **6. Privacy Policy Statement and Practices**

The Company's Privacy Policy Statement for general policy and practices in respect of our collection and use of personal data can be found at <https://www.citizen.com.hk/>.

We update our Privacy Policy Statement from time to time. Before proceeding with the provision of your personal data, we encourage you to familiarize yourself with our Privacy Policy Statement.

This version of this PICS is dated 1<sup>st</sup> July, 2023.

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Should there be any discrepancy between the English and Chinese versions, the English version shall prevail.