



APPENDIX IV

Consent to the Supplier Personal Information Processing Rules

供应商信息处理规则同意函

My company and I agree (and have procured that relevant data subjects agree*, if applicable) that:

本人及本公司同意（并确保已获得有关信息主体的同意*(如涉及)）：

- by checking this box, my company, relevant data subjects and I have read and fully understood the Supplier Personal Information Processing Rules of The Hong Kong Jockey Club (“The Club”)

勾选此框表示本人、本公司及有关信息主体已充分理解并同意香港赛马会（“马会”）的《供应商个人信息处理规则》

- personal information of mine and the relevant data subjects can be provided to third parties as described in the Supplier Personal Information Processing Rules and the Third Party Information Sharing List

本人及/或有关信息主体的个人信息如《供应商个人信息处理规则》及《第三方信息共享清单》所述向第三方提供

- personal information of mine and the relevant data subjects may be provided to overseas parties as described in the Supplier Personal Information Processing Rules and the Third Party Information Sharing List

本人及/或有关信息主体的个人信息如《供应商个人信息处理规则》及《第三方信息共享清单》所述于境外被处理

- the necessity of processing sensitive personal information and the impact of such processing on the rights and interests of mine and the relevant data subjects have been fully understood; by checking this box, The Club can process the sensitive personal information of mine and the relevant data subjects in accordance with the Supplier Personal Information Processing Rules

已充分理解处理敏感个人信息的必要性及对本人和有关信息主体相应权益的影响，勾选此框即表示同意马会按照《供应商个人信息处理规则》处理本人及/或有关信息主体的敏感个人信息

*You must have obtained the relevant authorization before you consent on behalf of your company and/or relevant data subjects. You consent to provide The Club with any necessary supporting documents to prove such authorization upon The Club’s request. You also consent to provide your company and relevant data subjects with a means to review the Supplier Personal Information Processing Rules and to inform such persons that they may contact The Club for more information.

您代表公司及其他有关信息主体进行确认前，须已获得有关授权。经马会要求，您同意向马会提供任何必要的支持文件以证明该等授权。您亦同意为您所代表的公司及及其他有关信息主体提供途径以阅读处理规则，并告知公司及该等人士，可联络马会以获取更多资料。

Name of the Supplier:

供应商名称: _____

Company Stamp

公司印章: _____

Signature 签名: _____

Name 姓名: _____



供应商个人信息处理规则

最新版更新日期：2023年11月7日

香港赛马会（以下简称“马会”或“我们”）深知个人信息的重要性，因此我们非常重视对个人信息的保护。我们将按照适用的法律法规要求并通过本《供应商个人信息处理规则》（以下简称“本规则”）告知我们的供应商（以下简称“您”）、您的员工、授权代表或其他工作人员（以下合称“员工”）以及其他信息主体（定义详见下文）有关我们处理相应个人信息的方式，以及我们提供的访问、更新、控制、保护和删除这些个人信息的方式。

适用

如果我们处理的个人信息系通过访问我们的供应商系统并通过供应商系统提交或通过其他方式向我们提交的，我们将根据本规则以及适用的数据保护法律法规（包括，中国香港《个人资料（私隐）条例》、《中华人民共和国个人信息保护法》以及其他对应的实施细则、司法解释及其他形式的适用法律文件）处理该等信息主体的个人信息。因此，任何信息主体在向我们提供任何个人信息之前，请确保已经仔细阅读、理解并同意本规则。

如果马会的关联公司使用了马会提供的采购服务但未设独立的个人信息处理规则的，则该部分服务同样适用本处理规则；如果马会的关联公司已设置独立的个人信息保护规则的，则独立的个人信息保护规则优先适用，该等独立的个人信息保护规则中未提及而本处理规则有约定的内容，适用本处理规则。

我们收集的个人信息可能由您直接提供，也可能由您的员工向我们提供，如果个人信息与您的员工、您的供应商及/或合作伙伴及/或其各自的员工（合称“信息主体”）相关，则您应让他们阅读本规则并确保已获得了相应信息主体就该类个人信息提供给我们处理的事先同意，并且他们也同意我们按本规则处理他们的个人信息，在前述情况下，我们可能会要求您提供必要支持文件以证明已取得了该等授权和同意。

定义

- 1、供应商系统：包括供应商登记系统、供应商审批系统、投标/报价系统、合同管理系统等。
- 2、个人信息：以电子或者其他方式记录的与已识别或者可识别的自然人有关的各种信息，不包括匿名化处理后的信息。
- 3、敏感个人信息：一旦泄露或者非法使用，容易导致自然人的人格尊严受到侵害或者人身、财产安全受到危害的个人信息，包括生物识别、宗教信仰、特定身份、医疗健康、金融账户、行踪轨迹等信息，以及不满十四周岁未成年人的个人信息。
- 4、处理：包括个人信息的收集、存储、使用、加工、传输、提供、公开、删除等。
- 5、中国内地：就本规则之目的而言，指中华人民共和国除香港特别行政区、澳门特别行政区和台湾以外的地区。
- 6、中国香港：指中华人民共和国香港特别行政区。

我们如何收集和使用个人信息

我们会遵循正当、合法、必要的原则，出于本规则所述的以下目的处理信息主体的个人信息。如果我们要将信息主体的个人信息用于本规则未载明的其它用途，或基于特定目的将已经收集的个人信息用于其他目的，我们将以合理的方式向您或信息主体告知，并在使用前再次征得相应同意。

我们收集和使用的个人信息包括由您或您的员工向我们主动提供的信息，也包括在允许或根据适用的法律法规之情况下，我们向其他来源包括我们的关联公司（例如，广州香港马会赛马训练有限公司，北京香港马会会所有有限公司）及/或我们的供应商及/或合作伙伴处获得的有关信息主体的其他个人信息，我们会将此类信息与我们所收集的相关个人信息进行整合，但在上述情况下，我们将要求第三方提供其个人信息来源合法的确认，并在授权的范围内使用相关信息。上述个人信息包括：

- 1、一般联系信息及身份识别信息，上述信息包括姓名、手机号码、电子邮箱地址、**身份证**等；
- 2、职能信息，上述信息包括公司名称、公司地址、办公室电话等；
- 3、资质、教育及职业背景信息，上述信息包括各类型资格证、个人职业、职位、工作单位、学历、学位、教育经历、工作经历、培训记录、成绩单、**社保信息**等。



我们仅会出于本规则所述的以下目的处理相应个人信息：

- 1、进行供应商筛选、完成供应商系统登记并通过供应商系统实施统一管理；
- 2、组织招标、回标以及落实合同准备过程中的任务或者履行现有合同；
- 3、通过供应商系统登记、处理订单；
- 4、向指定（联系人）人员发送或从指定（联系人）人员处接收产品或服务；
- 5、记账、开票和发票控制；
- 6、通过电子邮件和其他电子门户或第三方平台进行日常业务沟通及处理其他诉求。

我们如何共享、转让和公开披露个人信息

共享

我们仅会出于合法、正当、必要的目的共享个人信息。我们将评估第三方收集相应个人信息的合法性、正当性、必要性，同时，要求第三方在我们获授同意的范围内处理相应的个人信息，采取必要的信息管理措施与技术手段，防止个人信息发生泄露、损毁、丢失、篡改等后果。我们将在如下情形下与第三方共享个人信息：

- 1、事先获得信息主体明确的同意或授权，或经要求与第三方共享个人信息。
- 2、根据适用法律法规规定，或按照政府主管部门的强制性要求。
- 3、与关联公司共享：我们可能会出于集团统一管理及内部审核的目的，在必要限度内与关联公司共享个人信息，在此情形下，关联公司将同样根据本规则采取同等的安全保障措施保障个人信息的安全。
- 4、与合作伙伴共享：为进行必要的供应商资质、专业经验、产品和服务质量以及供应商背景合规审查之目的，我们可能会与从事背景调查的合作伙伴共享个人信息。在所述情形下，我们会要求该等合作伙伴采取不低于本规则规定的安全保障措施来保护个人信息安全。具体详情可参阅《第三方信息共享清单》。

转让

我们不会将个人信息转让给任何公司、组织和个人，但以下情况除外：

- 1、获得明确同意或授权；
- 2、根据适用的法律法规、法律程序的要求、强制性的行政或司法要求；
- 3、在涉及合并、收购、重组或破产清算时，如涉及到个人信息转让，我们会在正式进行信息转让前，向相应的信息主体告知接收信息公司、组织的名称和联系方式，并要求新的持有相应个人信息的公司、组织继续受本规则的约束，否则我们将要求该公司、组织重新向相应信息主体征求授权同意。

公开披露

我们仅会在以下情况下，公开披露个人信息：

- 1、在征得单独同意的前提下，根据经认可的披露方式披露个人信息；
- 2、根据法律、法规的要求、强制性的行政执法或司法要求所必须提供的情况下，我们可能会依据所要求的个人信息类型和披露方式披露相应的个人信息。

我们如何存储个人信息

我们依据适用的数据保护法律和法规存储个人信息，以满足合理的业务需求。当相应的个人信息不再相关时以及在适用法律规定的最长存储期到期后的任何情况下，我们会妥善处置个人信息，除非在更长的时期内需要个人信息，例如在进行索赔、诉讼或其他监管调查时。

在评估数据存储期时，我们考虑个人信息的数量、性质和敏感性，个人信息在未经授权的情况下遭到使用或披露后造成危害的潜在风险，我们处理个人信息的目的并且我们能否通过其他方式达成这些目的以及适用的法律规定。



跨境传输

作为一家运营地位于中国香港的企业，出于业务需要，我们会同步在香港或其他系统服务器所在地区对个人信息进行处理，除了获得授权同意及完成相应的跨境传输及再传输的条件外，我们还将采取一切合理必要的步骤，以确保相应个人信息得到安全处理，得到在中国内地及/或中国香港足够同等的保护。具体详情可参阅《第三方信息共享清单》。

我们如何保护个人信息安全

个人信息的安全性、完整性和保密性对我们而言至关重要。我们已经实施了技术上的、管理上的和物理上的安全措施，这些措施旨在确保个人信息免受未经授权的访问、泄露、使用和修改。我们定期审查我们的供应商系统，以考虑采用适当的新技术和方法。我们对可能接触到个人信息的员工也采取了严格管理，可监控他们的操作情况，对于数据的传输使用、脱敏、解密等重要操作建立了审批机制，并与上述员工签署保密协议等。与此同时，我们还定期对员工进行信息安全培训，要求员工在日常工作中形成良好操作习惯，提升个人信息的安全保护意识。

请知悉，尽管我们已尽最大努力，但没有任何安全措施是完美或万无一失的，如不幸发生个人信息安全事故，我们将按照适用法律法规的要求，及时向有关信息主体告知安全事故基本情况、可能的影响、已采取或将采取的措施等，并按照监管部门的要求，主动上报安全事故的处置情况。

个人信息权利

信息主体有权要求查阅、复制、更正、补充或删除相应的个人信息，或对于我们处理个人信息的行为提出反对或限制。如需行使上述权利的，可按本规则“联系我们”中提供的联系方式联系我们。

本规则的变更

为了确保本规则能够符合我们最新的管理实践、业界标准以及监管要求或实现其他目的，我们会不时对本规则进行修订，我们将标注本规则最近更新的日期，该等更新构成本规则的一部分。未经您及/或信息主体明确同意，我们不会削减信息主体按照本规则所应享有的权利。如果涉及重大变更，我们会通过包括但不限于电子邮件、信函或其他联络方式向您及/或信息主体告知并取得您及/或信息主体的同意。

联系我们

如对我们的个人信息处理活动有任何问题或疑问，请通过包括但不限于发送电邮、致电或写信等方式联系马会采购部与您日常对接的员工。我们将在收到您的问题或疑问后 15 个工作日内答复。

适用语言

本处理规则以简体中文写就，且可能被翻译成英文或者其他语言文字。如本处理规则的简体中文版本与翻译版本有歧义，概以简体中文版本为准。



第三方信息共享清單

五

接收方 公司名称	共享信息	使用场景	使用目的	共享方式	保存期限	接收方个人信息处理规则
背景调查服务供应商	姓名、公司名称、公司地址、手机号码、办公室电话、电子邮箱	筛选供应商、 供应商登记	对部分供应商开展背景调查	电子邮件	供应商终止合作后七年	请联系马会以获取联系方式
关联公司	姓名、公司名称、公司地址、手机号码、办公室电话、电子邮箱、背景调查	筛选供应商、招标投标评估、合同评估	集团资源共享	电子邮件 / 电脑硬盘	供应商筛选：终止合作后七年； 回标文件：采购项目终止后七年； 合同：合同到期后七年。	请联系马会以获取联系方式

Personal Information Processing Rules for Suppliers

Latest version: 7th November, 2023

The Hong Kong Jockey Club (“the Club”, “we”, “us” or “our”) empathises with the importance of personal information, therefore, the Club attaches great importance to the protection of personal information. The Club will, pursuant to applicable laws and regulations and through this Personal Information Processing Rules for Suppliers (“the Rules”), inform our suppliers (“you” or “your”), your employees, authorized representatives or other staff (collectively, “Employees”) and other Data Subjects (as defined below) of the way we process personal information and the manner in which we provide access to, update, control, protect and delete such personal information.

Scope of Application

If the Data Subjects whose personal information we process are submitted to us by accessing and through our supplier systems or in any other ways, we will process the personal information in accordance with the Rules and the applicable laws and regulations on data protection (including, the Personal Data (Privacy) Ordinance of the Hong Kong Special Administrative Region, the Personal Information Protection Law of the People’s Republic of China as well as their corresponding implementing regulations, judicial interpretations and any other forms of applicable legal instruments). Therefore, any Data Subjects are expected to confirm that they have carefully read, understood and agreed to the Rules before providing any personal information to us.

If affiliates of the Club have not developed independent personal information processing rules but have utilised procurement services provided by the Club, the Rules shall apply equally to such portion of the services. If affiliates of the Club have developed independent personal information protection rules, such independent rules shall prevail. However, for the contents that are not mentioned in such independent rules but are provided in the Rules, the Rules shall apply.

The Club may collect personal information directly from you and/or your Employees. If the personal information is related to your Employees, your suppliers and/or partners and/or their respective Employees (collectively, “Data Subjects”), you shall allow them to read the Rules and shall obtain their prior consent to the provision of their personal information to us for processing, and their consent to us for processing their personal information in accordance with the Rules. In such cases, the Club may request you to provide necessary supporting documentation to evidence that such authorizations and consents have been obtained.



Definition

1. Supplier system(s) shall include the supplier registration system, the supplier approval system, the tendering/quotation system and the contract management system.
2. Personal information refers to all kinds of information related to identified or identifiable natural persons recorded by electronic or other means, excluding the information processed anonymously.
3. Sensitive personal information refers to the personal information that is likely to result in damage to the personal dignity of any natural person or damage to his or her personal or property safety once disclosed or illegally used, including such information as biometric identification, religious belief, specific identity, medical health, financial account and whereabouts and tracks, as well as the personal information of minors under the age of 14.
4. Process(ing) includes the collection, storage, use, processing, transmission, provision, disclosure and deletion, etc. of personal information.
5. Mainland China, for the purpose of the Rules, means the area of the People's Republic of China other than the Hong Kong Special Administrative Region, the Macao Special Administrative Region and Taiwan.
6. Hong Kong, means the Hong Kong Special Administrative Region of the People's Republic of China.

How We Collect and Use Personal Information

The Club complies with the principles of legitimacy, legality and necessity in processing the personal information of the Data Subjects for the following purposes described in the Rules. If the Club intends to use the personal information for any other purposes not set forth in the Rules, or to use the personal information which has been collected for other purposes based on any specified purposes, we shall inform you or the Data Subjects in a reasonable manner and obtain the corresponding consent again before use.

The personal information we collect and use includes information voluntarily provided to us by you or your Employees, as well as other personal information relating to the Data Subjects that we obtain from other sources, including our affiliates (e.g., Guangzhou HKJC Race Horse Training Limited, Beijing Hong Kong Jockey Club Clubhouse Co., Ltd.) and/or our suppliers and/or partners, as permitted by, or in accordance with, applicable laws and regulations. We may integrate such information with the relevant personal information we have collected, but in such cases, we will require the third party to provide confirmation of the lawfulness of the source of their personal information and to use the information within the scope of the authorization. The above personal information includes:

1. General contact information and identification information, which includes name, mobile phone number, email address, **ID card**, etc.
2. Profession information, which includes the name and address of the company, office phone number, etc.
3. Qualification, education and profession background information, which includes various types of qualification certificates, occupations, positions, employers, academic qualifications, degrees, education experiences, work experiences, training records, transcripts, **social security information**, etc.

The Club shall only process the corresponding personal information in accordance with the following purposes described in the Rules:

1. to conduct supplier selection, to complete registration in the supplier system and to implement unified management through the supplier system;
2. to organize tenders, tender returns and to implement tasks in the process of contract preparation, and to perform existing



contracts;

3. to register and process orders through the supplier system;
4. to send or receive products or services to or from designated (contact) persons;
5. to conduct bookkeeping, billing and invoice control;
6. daily business communication and handling of other requests via email and other e-portals or third-party platforms.

How We Share, Transfer, and Publicly Disclose Personal Information

Share

The Club will only share personal information for purposes that are legitimate, proper and necessary. We will assess the legality, legitimacy, and necessity of the third party's collection of your personal information, and will require the third party to process your personal information within the scope of your authorization and consent, as well as to take necessary measures and technical means to prevent the leakage, destruction, loss and falsification of your personal information. We will share your personal information with third parties in the following circumstances:

1. such share is with explicit consent or authorization of the Data Subjects, or upon request to share personal information with third parties;
2. such share is in accordance with applicable laws and regulations, or mandatory administrative requirements;
3. to share with affiliated companies: in order to achieve unified management of our group and internal auditing, the Club may share personal information with our affiliated companies to the extent necessary. In such cases, the Club's affiliated companies will adopt protection measures equivalent to those set out herein.
4. to share with business partners: in order to conduct the necessary compliance checks on suppliers' qualifications, professional experience, quality of products and services, and suppliers' backgrounds, the Club may share personal information with our partners who conduct background checks. In such cases, the Club would require such partners to maintain no less stringent protection measures than those set out herein. You may refer to the attachment titled *the Third Party List of Information Sharing* in the Rules for more information.

Transfer

We will not transfer your personal information to any company, organization or individual, except in the following cases:

1. such transfer is with your explicit consent;
2. such transfer is in accordance with applicable laws and regulations, the requirements of legal procedures, mandatory administrative or judicial requirements;
3. in the event of a merger, acquisition, reorganization or liquidation, in case of transfer of personal information, we will, prior to the formal transfer of the information, inform the corresponding Data Subjects of the names and contact details of the recipient companies or organizations, and require the recipient companies or organizations to remain bound by the Rules or to otherwise re-obtain consent from the Data Subjects.

Public Disclosure

We will only publicly disclose your personal information under the following circumstances:

1. such disclosure is with separate consent and acknowledgment of the disclosure methods;
2. such disclosure is made in accordance with the type of personal information requested and the manner of disclosure when required by laws, regulations, mandatory administrative or judicial requirements.



How We Store Personal Information

The Club will store your personal information in accordance with applicable personal information protection laws and regulations to fulfil our reasonable business needs. The Club secure the appropriate disposition of the personal information when it is no longer relevant and in any case after the maximum storage period defined by applicable law has expired, unless the personal information is needed for a longer period of time, for example when making claims, litigation or other regulatory investigations.

When assessing the retention period of personal information, the Club give sufficient consideration to factors such as the volume, nature and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of the personal information, the purposes of processing the personal information and whether those purposes can be achieved by other means, and applicable legal requirements.

Cross-border Transfer of Personal Information

Please understand that as a company operating in Hong Kong, we may process personal information in Hong Kong or in other regions where our system servers are located simultaneously for business purposes. In addition to obtaining the authorization and fulfilling the conditions for the cross-border transfer and re-transfer, we will take any other reasonably necessary steps to ensure that personal information is securely processed and given adequate or equivalent protection in Mainland China and/or Hong Kong. You may refer to the attachment titled *the Third Party List of Information Sharing* in the Rules for more information.

How We Protect the Security of Personal Information

The security, integrity and confidentiality of personal information is of paramount importance to the Club. The Club have implemented technical, administrative and physical security measures that are designed to secure personal information from unauthorized access, disclosure, use and modification. We regularly review our supplier systems to consider the adoption of appropriate and new technologies and methods. The Club also adopts strict management of employees who may have access to personal information to monitor their operations, and establishes approval mechanisms for important operations such as transmission and use, desensitization and decryption, as well as signing confidentiality agreements with these employees, etc. At the same time, the Club also regularly conducts information security trainings for employees, requiring them to form good operating habits in their daily work and enhance their awareness of data protection.

Please be aware that no security measures are perfect or infallible, despite that we have made our best efforts. In the unfortunate event of a personal information security incident, the Club will promptly notify the relevant Data Subjects of the basic situation of the security incident, the possible impacts, and the measures that have been taken or will be taken in accordance with applicable laws and regulations and will take the initiative to report on the disposition of the security incident in accordance with the requirements of the supervisory authorities.

Personal Information Rights

The Data Subjects have the right to access, reproduce, rectify, add and delete relevant personal information, or to object or restrict the processing of the personal information by the Club. To exercise the aforesaid rights, please contact us via the contact information set out in the chapter titled How to Contact Us of the Rules.

Changes to the Rules

In order to ensure that the Rules are consistent with our latest administration practices, industry standards, and regulatory requirements or for other purposes, we may amend the Rules from time to time, and we shall mark the latest date of the



Rules, which constitutes a part of the Rules. Without explicit consent from you and/or the Data Subjects, we will not mitigate the rights of the Data Subjects under the Rules. For major changes to the Rules, we will send a notice to you and/or the Data Subjects by means including, but not limited to, email, letter or other contact means and obtain separate consent from you and/or the Data Subjects.

How to Contact Us

If you have any questions or concerns regarding our processing of personal information, please contact the employee who contacts you in our Procurement Department by any means, including but not limited to sending an e-mail, calling or writing. We will respond within 15 workdays from the time we receive your questions or concerns.

Languages

The Rules are written in simplified Chinese and may be translated into English or other languages. In case of any discrepancies between the simplified Chinese version and the translated version of the Rules, the simplified Chinese version shall prevail.

Third Party List of Information Sharing

Recipient	Shared Information	Scenarios of Use	Purpose of Use	Ways to Share	Retention Period	Personal Information Processing Rules of Recipient
Background Check Service Providers	Name, company name, company address, mobile phone number, office phone number, email address	Supplier selection, supplier registration	Conduct background checks on selected suppliers]	Email	Seven years after termination of cooperation with suppliers	Please contact the Club for further information
Affiliate companies	Name, company name, company address, mobile phone number, office phone number, email address, background check	Supplier selection, bidding evaluation, contract evaluation	Share resources within the group	Email/share drive	Supplier selection: seven years after termination of cooperation; Tender documents: seven years after termination of the procurement project; Contracts: seven years after expiry of the contract.	Please contact the Club for further information