

## **PRIVACY POLICY & PERSONAL INFORMATION COLLECTION STATEMENT (“PICS”)**

### **1. Our Commitment to Privacy:**

**Giordano International Limited** together with its group companies (“Giordano Group”, “we”, “our” or “us”) respects our customers’ and web-users’ legal rights of privacy when collecting, storing, using and transmitting their personal data. This PICS explains our privacy policy and sets out the following practices we commit to protect our customers’/web-users’ privacy and personal data.

- to put in place appropriate physical and electronic measures, policies and managerial procedures to safeguard and secure the personal data that we have under our control from unauthorised access, improper use, alteration, unlawful or accidental destruction or loss;
- to limit the personal data collected to the minimum required;
- to only permit authorised personnel, who are obliged to respect the confidentiality of the personal data, to access to the personal data on a “**need-to-know**” basis; and
- not to disclose the personal data to any external parties (except to our employees, professional advisors, subcontractors of database management, agents and business partners in/outside Hong Kong), unless customers/web-users have agreed, or we are required by the laws and regulations of the Stock Exchange or the court orders or the directions of governmental body or regulatory authority of competent jurisdiction.

We treat all personal data collected in accordance with the provisions of the Personal Data (Privacy) Ordinance (Cap.486) of the Laws of Hong Kong (as amended from time-to-time). This Ordinance controls personal information collected and held by both public and private bodies and applies to automated and non-automated data, which can be reviewed at the Office of the Privacy Commissioner for Personal Data website at :

[http://www.pcpd.org.hk/english/data\\_privacy\\_law/ordinance\\_at\\_a\\_Glance/ordinance.html](http://www.pcpd.org.hk/english/data_privacy_law/ordinance_at_a_Glance/ordinance.html)

For web-users, this PICS applies only to this website. Wherever we link to other sites not covered by this PICS, we will endeavor to title links appropriately so the users are aware that they are being forwarded to a third-party site.

Where our operations are subject to privacy legislation other than that of Hong Kong (such as due to our carrying out of operational functions outside of Hong Kong), this PICS shall apply so far as it is consistent with such local legislation.

We may be required to change this PICS from time-to-time, so we recommend checking it occasionally. Any amendments to this PICS will continue to be in accordance with the provisions of the Personal Data (Privacy) Ordinance (Cap.486) (as amended from time-to-time). In case of any inconsistency between the English and the Chinese versions of this PICS, the English version shall prevail.

## **2. Personal Data Collection:**

**“Personal data”** means any personally identifying information or sensitive data (such as name, phone number, residential/e-mail address, facsimile number, credit card information) from which it is practicable for the identity of an individual to be ascertained.

Personal data may be collected by the following means:

- telephone;
- correspondences (letter, facsimile and e-mail);
- Internet site;
- point of sales;
- membership enrolment;
- customer loyalty programmes; and
- direct customer survey.

Besides, through our website, we may also collect other information when one completes an on-line subscription, inquiry or order.

We may maintain log files recording visitors' below information:

- the Internet Protocol (IP) address;
- the date and time of visit;
- the webpage accessed and documents downloaded; and
- the type of browser being used.

The log files provide us with statistical information on how people use the site and what content people are viewing. They do not contain any personal information and they are not used to identify any individual patterns of use of the site.

Customers/web-users who are under the age of 16 must consult with their parent or guardian before providing any personal data to us.

We have a legal duty to protect any information collected. We endeavor to use technologies and encryption software to safeguard the personal data, and keep strict security standards to prevent any unauthorised access to it.

### **3. Purpose of Using Personal Data:**

The purposes for which we may use customers'/web-users' personal data are divided into obligatory purposes and voluntary purposes. If personal data is to be used for an obligatory purpose, it will be marked as "**Required**" in our forms or data provision columns, and customers/web-users MUST provide his/her personal data to us if in need of our products or services for which being applied. If personal data is only to be used for a voluntary purpose, it is entirely up to customers'/web-users' choice of whether to provide so or not.

- Purposes for collecting obligatory personal data include :

- (i) providing goods and/or services of our brands (including **Giordano, Giordano Junior, Giordano Ladies, Giordano Women, Giordano Men, Concepts1One, Giordano Gold, BSX, and Beau Monde** etc.);
- (ii) enrolment into and maintaining membership;
- (iii) handling accumulated and/or redeemed bonus points or privileges;
- (iv) communicating to customers about entitlements and privileges as our members;
- (v) notification of any amendment to the membership programme;
- (vi) checking and verifying customers' identity, credit payment and/or account status in relation to the provision of products and/or services;
- (vii) processing payment instructions, direct debit facilities and/or credit facilities requested by customers;
- (viii) data cleansing and customers profile updates; and
- (ix) any other purposes to which customers/web-users have given consent.

- Purposes for collecting voluntary personal data include :

- (i) to distribute customer satisfaction survey;
- (ii) to conduct market research and analysis to better understand our customers, so as to enable us to provide rewards, services and product information or offerings better tailored to customers' needs;

(iii) to conduct business planning, such as service design and continuous improvement in services for customers;

(iv) to communicate to customers for direct marketing :

- a. new product launch and other promotional offers of products and services under our brands, including but not limited to apparel and fashion accessories, rain gear, gift items, and lifestyle enhanced services;
- b. promotional events, including PR events, shop opening events, store announcement/events and news updates;
- c. marketing reward programmes, promotional campaigns and roadshows;
- d. joint promotion or events with shopping malls, department stores, credit cards, banks, trades, celebrities, mass media (e.g. magazines, television, websites), charities or non-profit organisations; and
- e. cross-brand joint promotions and/or events with brands within Giordano Group.

#### **4. Rights to opt-out, access and correction**

If at any other point of time customers/web-users do not wish us to use his/her personal data for use in direct marketing as described above, they may exercise their opt-out rights by notifying us (see the below contact details).

Additionally, customers/web-users may at any time contact us using the details below to request access to and/or correct his/her personal data in our records. We will respond to such requests within 40 days and may charge a reasonable fee for doing so. Customers/web-users will be expected to provide proof of identity. Insofar as the law permits, however, we reserve the right to refuse to provide customers/web-users with information. In this eventuality, we will provide the reasons for refusal.

#### **5. How to contact us:**

This PICS applies to all customers and web-users, which may be updated and revised from time-to-time without prior notice. We will, however, post the update version on our website. Should customers/web-users have any questions or concerns about this PICS, or wish to correct his/her personal data or remove the membership or choose not to receive any promotional materials, please contact us :

For e-Shop customers :

E-mail address : [onlinesales@giordano.com.sg](mailto:onlinesales@giordano.com.sg)

For others:

Post : **GIORDANO ORIGINALS (SINGAPORE) PRIVATE LIMITED**

11 Ubi Road 1, #04-02 Singapore 408723.

E-mail address : [customers@giordano.com.sg](mailto:customers@giordano.com.sg)

Phone number: (+65) 9457 9151 (during office hours)

## **6. Retention/Security of Data**

We shall keep customers' and web-users' personal data for as long as necessary to fulfill the purpose for which the data was collected. We may also retain archived personal data for statistical purposes. Personal data which is no longer required will be destroyed.

If customers/web-users provide personal data via facsimile, e-mail or completing an on-line inquiry, please be aware that there may have risks in transmitting such information on the Internet. We have secured our website using industry standard technology, and all on-line personal data is stored behind industry standard firewalls and where applicable, protected by user name and password. However, we cannot provide any guarantee with respect to the security of customers'/web-users' personal data, and we will not be liable for any breach of security or unintended loss or disclosure of information due to the website being linked to the Internet. In this regard, we urge web-users to take every precaution to protect his/her personal data while he/she is on the Internet.

## **7. Identifier**

We shall not adopt any Commonwealth identifier (e.g. Medicare number or a Tax File Number) as a means of identifying any personal information that we may have collected about an individual.

## **8. Acknowledgement**

By using our website and/or providing personal data on-line or by signing our membership application forms etc., customers and web-users are deemed to

acknowledge and agree to our Privacy Policy, Cookie Policy and Terms and Conditions of Use.

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