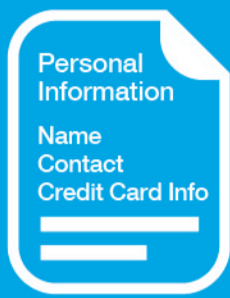


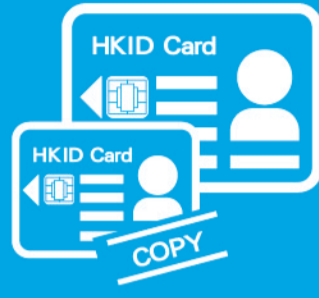
# Protect, Respect Personal Data

# Guidance for Mobile Service Operators

## Handling Service Applications



Consider carefully the necessity of collecting each item of personal data. Ensure the data collected is adequate but not excessive.



Collection of a Hong Kong Identity Card number / copy must be justified and permissible under the *Code of Practice on the Identity Card Number and other Personal Identifiers*.



Provide service applicants with a Personal Information Collection Statement stating clearly the purposes of collecting the data, the classes of persons to whom the data may be transferred, the consequences of failing to supply the data and the right of access to and correction of the data.



Provide clear policies, procedures and guidelines to the marketing staff / outsourced promoters conducting marketing campaigns outdoors to ensure the safe storage and secure transmission and handling of the personal data collected.

## Maintaining Customers' Service Accounts



Exercise due care when inputting customers' personal data into customers' database to ensure the accuracy of customers' personal data held.



When a customer requests a change of his account information, verify with the requestor that the request is from the genuine customer.



Formulate policies and practices to specify the retention period of different types of customers' personal data, and erase personal data that is no longer required for fulfilment of the collection purpose.



Ensure the addresses used to send dunning letters are accurate and the envelopes used have marked "private and confidential". Where a debt collection agent is engaged to collect overdue charges, disclose to the agent only such information necessary to carry out the action.



## Audio-recording of a Conversation with Customers

Notify customers prior to the audio-recording and inform them of its purpose to avoid offending them or constituting unfair collection of personal data.



## Engaging Third Party Agent / Dealer

Be accountable for the acts done or practices engaged by its agents or contractors (such as IT contractors, debt collection agents or marketing agents) within the scope of the authority given to them.



## Carrying Out of Direct Marketing Activities

Notify customers and obtain their consent before using or providing their personal data in direct marketing.



## Disclosure of Customers' Account Data

Obtain prescribed consent from a customer concerned if the customer's personal data is disclosed for a new purpose.

## Measures to Protect Service Account Data



Use a password with high security level for the creation of an online account as the defaulted password, and remind customers to change it.



Restrict the access of customers' database by staff to protect the data against unauthorised or accidental access, processing or erasure.



Care must be taken in the arrangement and the design of the shop if customers' personal data is required to be processed in a public area (such as open-plan shops or service desks).



## Handling of Data Access / Correction Requests

Respond to customers' data access / correction requests within 40 calendar days after receipt, by writing to the requestors that either it holds the requested data and supplying copies of them or it does not hold the data.

\*For details, please refer to the content of "Guidance for Mobile Service Operators".