

Privacy Notice (Kyra Lounge)

「Kyra 貴賓室」私隱政策聲明

Effective Date: 23 March 2026

Last Updated: 23 March 2026

生效日期：2026 年 3 月 23 日

最後更新日期：2026 年 3 月 23 日

1. Introduction

What this notice covers

This Privacy Notice explains how Kyra Lounge t/a SSP AD Lounges HK Limited ("**we**", "**us**", "**our**", "**SSPADL**") collects, uses, discloses, and protects your personal data when you:

- access and use our lounge facilities in Hong Kong
- visit our website and use our online booking or inquiry services
- interact with our marketing communications and promotional materials
- contact us via email, phone, or other communication channels
- handling your queries or complaints

This notice applies to all lounge guests, visitors, and individuals whose personal data we process in connection with our lounge operations, website usage, and marketing activities.

Your privacy matters to us

We are committed to protecting your privacy and being transparent about how we use your information. We comply with applicable data protection laws, including but not limited to Hong Kong's Personal Data (Privacy) Ordinance (Cap. 486) and the General Data Protection Regulation ("GDPR").

For general information about how SSP group processes personal data across the Asia-Pacific region, you may refer to our [SSP APAC Privacy Notice](#). However, this Privacy Notice

1. 引言

本私隱政策聲明的適用範圍

本私隱政策聲明說明 Kyra 貴賓室（以 SSP AD Lounges HK Limited 名義經營）（「本公司」、「我們」、「SSPADL」）在下列情況下如何收集、使用、披露及保障閣下的個人資料：

- 當閣下使用及享用本公司在香港的貴賓室設施
- 當閣下瀏覽本公司網站並使用其網上訂座或查詢服務
- 當閣下接收或閱覽本公司的市場推廣通訊及宣傳資料
- 當閣下透過電郵、電話或其他通訊渠道與本公司聯絡
- 當本公司處理閣下的查詢或投訴時

本通知適用於所有貴賓室旅客、訪客，以及任何因本公司貴賓室營運、網站使用及市場推廣活動而其個人資料被本公司處理的個人。

我們非常重視閣下的私隱

本公司致力保障閣下的私隱，並會公開透明地說明我們如何使用閣下的資料。本公司遵守適用的個人資料保護法律，包括但不限於香港《個人資料（私隱）條例》（第 486 章）（下稱「私隱條例」）及歐盟/英國《通用數據保障條例》（「GDPR」）。

如欲了解 SSP 集團在亞太區如何處理個人資料的一般資訊，閣下可參閱本公司之《SSP 亞太區私隱政策聲明》（目前只提供英文版本）。然而，本私隱政策聲明提供我們香港業務就

provides comprehensive detail about our practices specific to Hong Kong operations, so you do not need to read the APAC notice to understand how we handle your data.

Acknowledgment

By accessing and using our lounge facilities, you acknowledge that you have read, understood, and agree to the terms of this Privacy Notice and consent to the processing of your personal data as described herein, where consent is the applicable legal basis.

2. Data Controller Information

Data Controller:

SSPADL is the data controller of your personal data in relation to your use of our lounge facilities at these premises. If you have any questions about this Privacy Notice or how we handle your personal data, please contact us at:

SSP AD Lounges HK Limited
Suites 1201-2 & 12-14, 12/F.,
North Tower, World Finance Centre,
Harbour City, Tsim Sha Tsui,
Hong Kong.
Email: privacynotice@ssp.com.hk

For regional data protection inquiries, you may also contact our Asia-Pacific data protection team as specified in our [SSP APAC Privacy Notice](#).

3. Categories of Personal Data We Collect

What is "personal data"?

Personal data means any information that can identify you as an individual, either directly

個人資料保護的詳盡說明，閣下無須閱讀上述亞太區私隱通知亦可了解我們如何處理您的個人資料。

確認聲明

當閣下進入及使用本公司貴賓室設施，即表示閣下確認已閱讀、明白並同意本私隱通知的條款，並在同意作為適用法律基礎的情況下，同意本公司按照本通知所述方式處理閣下的個人資料。

2. 資料控制者(資料使用者)資料

資料控制者(資料使用者):

就閣下使用本貴賓室設施而言，SSPADL 為閣下個人資料的資料控制者(資料使用者)。如對本私隱政策聲明或本公司如何處理閣下的個人資料有任何查詢，請聯絡：

SSP AD Lounges HK Limited
香港九龍尖沙咀海港城世界金融中心北座十二樓 1201-2 及 12-14 室
電郵: privacynotice@ssp.com.hk

就亞太區的個人資料保護事宜，閣下亦可按照《SSP 亞太區私隱政策聲明》內所載資料，聯絡本公司亞太區保障資料部。

3. 我們所收集的個人資料類別

甚麼是「個人資料」？

「個人資料」是指任何可直接（例如閣下的姓名）或間接（例如與閣下有關的會員編

(like your name) or indirectly (like a membership number linked to you). This includes information you give us directly, information we collect automatically (like CCTV footage), and information we receive from third parties (like airlines).

We collect and process the following categories of personal data in connection with our lounge operations, website usage, and marketing activities (if any):

3.1 Lounge Access and Eligibility Verification

What we collect and why: When you enter our lounge, we need to verify that you are eligible for access. This may be based on your airline ticket class, loyalty program membership, credit card benefits, or day pass purchase. The information we collect for this purpose includes:

- Name
- Membership number or card details (e.g., airline loyalty program number, credit card number)
- Flight information (flight number, destination, departure time)
- Access credentials and entitlement documentation
- Time and date of lounge access
- Airline or travel partner affiliation
- Where payment is required, transaction and payment details

3.2 CCTV and Video Surveillance

What we collect and why: We operate CCTV cameras throughout our lounge to help ensure the safety and security of our customers and employees, protect our assets, and comply with airport security requirements. The information we collect for this purpose includes:

號) 識別閣下身分的資料。此等資料包括閣下直接向本公司提供的資料、本公司自動收集的資料 (例如閉路電視錄像), 以及本公司從第三方 (例如航空公司) 取得的資料。

就本公司貴賓室營運、網站使用及市場推廣活動 (如有) 而言, 我們會收集及處理下列類別的個人資料:

3.1 貴賓室使用權及資格核實

我們收集的資料及原因: 閣下進入本貴賓室時, 我們須核實閣下是否符合貴賓室使用資格; 該使用資格可能基於閣下的機票艙等、常客計劃會員資格、信用卡福利/優惠或即日通行證購買紀錄。我們為此目的而收集的資料包括:

- 姓名
- 會員編號或卡資料 (例如航空公司常客計劃之會員編號、信用卡號碼)
- 航班資料 (航班編號、目的地、起飛時間)
- 進場憑證及證明閣下享有相關使用資格權益的文件
- 進入及使用貴賓室的日期及時間
- 航空公司或旅遊會合作夥伴之資料
- 如需付款, 相關交易及付款資料

3.2 閉路電視及影像監察

我們收集的資料及原因: 本公司於貴賓室設有閉路電視鏡頭, 以協助保障顧客及僱員的安全、保護本公司資產, 並遵守機場保安規定。我們為此目的而收集的資料包括:

- 閉路電視鏡頭所拍攝的影像及畫面
- 與該等錄像相關之日期、時間及地點資料

- Video footage and images captured by CCTV cameras
- Date, time, and location information associated with the recordings

3.3 Complaints Handling

What we collect and why: If you submit a complaint or feedback about our services, we collect information to investigate and respond to your concerns and improve our service quality. The information we collect for this purpose includes:

- Name and contact details (email, phone number)
- Details of the complaint or feedback
- Communication records and correspondence
- Any supporting documentation provided

3.4 Wi-Fi and Network Usage

What we collect and why: When you connect to our lounge Wi-Fi or other network services, certain technical information is collected to provide you with connectivity, maintain network security, and generate aggregate statistics.

- Device identifiers (such as MAC address)
- Connection time, duration, and IP address assigned
- Basic log information for network security and troubleshooting

3.5 Personal Incident Reporting

What we collect and why: If an incident occurs in our lounge (such as an accident, injury, lost property, or security incident), we document the details to manage the incident,

3.3 投訴處理

我們收集的資料及原因：當閣下提出投訴或提供意見時，我們會收集若干資料，以便調查及處理有關事宜、就結果與閣下跟進，並改進本公司的服務。我們為此目的而收集的資料包括：

- 姓名及聯絡資料（例如電郵地址及電話號碼）
- 閣下投訴、查詢或意見的內容詳情
- 往來通訊紀錄及本公司所採取的跟進行動紀錄
- 與閣下投訴事項相關的任何交易或到訪紀錄詳情

3.4 無線上網及網絡使用

我們收集的資料及原因：當閣下連接本公司貴賓室之無線上網或其他網絡服務時，我們會收集若干技術資料，以向閣下提供連線服務、維持網絡保安及編製匯總統計數據。

- 裝置識別資料（例如 MAC 地址）
- 連線時間、時長及獲分配之 IP 位址
- 為網絡保安及故障排解而保留的基本日誌資料

3.5 個人事故報告

我們收集的資料及原因：如在貴賓室內發生涉及閣下的事故（例如意外、受傷、財物遺失或爭執），我們可能會收集相關資料，以

fulfill our legal obligations, handle insurance claims, and protect the safety of all guests.

- Name and contact details
- Details of the incident (nature, time, location, circumstances)
- Health information (if the incident involves injury or medical assistance)
- Witness statements and evidence

3.6 Data Subject Rights Requests

What we collect and why: When you exercise your privacy rights (such as requesting access to your data or asking us to correct it), we need to verify your identity and process your request.

- Name and contact details
- Identification documents (for verification purposes)
- Details of the rights request
- Communication records

3.7 Website Usage and Cookies

What we collect and why: When you visit our website or use our online services, we automatically collect technical information about your device and how you interact with our website. This helps us improve website performance, understand user preferences, and provide personalized content.

- IP address and device identifiers
- Browser type and version
- Operating system
- Pages visited, time spent, and navigation patterns
- Referral source (how you arrived at our website)
- Cookie identifiers and tracking data
- Preferences and settings

記錄事故、履行法定責任、處理保險索償及提升安全水平。

- 涉事人士的姓名及聯絡資料
- 事故詳情（包括日期、時間、地點及事發經過）
- 在有需要時的相關健康或醫療資料（例如在有人受傷的情況下）
- 證人陳述及相關證據

3.6 資料當事人權利請求

我們收集的資料及原因：當閣下行使私隱權利（例如要求查閱或改正閣下的資料）時，我們須核實閣下身分並處理有關請求。

- 姓名及聯絡資料
- 身分證明文件（用於核實身分）
- 有關權利申請的具體內容
- 有關申請的通訊及往來紀錄

3.7 網站使用情況及 Cookies

我們收集的資料及原因：當閣下瀏覽本公司網站或使用網上服務時，我們會自動收集閣下裝置的技術資料及閣下與網站互動的方式；這有助我們改善網站性能、了解用戶喜好，並提供個人化內容。

- IP 地址(及域名)及裝置識別碼
- 瀏覽器類型及版本
- 操作系統
- 瀏覽頁面、停留時間及瀏覽路徑模式
- 來源資料（例如閣下如何連結至本公司網站）
- Cookie 識別碼及相關追蹤資料
- 閣下的偏好及設定

如欲詳情了解 Cookies 及類似技術的使用情況，請參閱下文第 6 節。

For detailed information about cookies and similar technologies, see Section 6 below.

3.8 Survey, Marketing and Communications

What we collect and why: If you sign up for our marketing communications, participate in promotions, complete surveys at our lounge, or interact with our advertising, we collect information to understand your preferences and send you relevant offers, news, and updates about our lounge services.

- Email address and phone number
- Name and preferred language
- Marketing preferences and consent records
- Communication history and engagement data (e.g. email opens, clicks)
- Promotional codes or voucher usage
- Survey responses and feedback

3.9 Special Categories/ Sensitive Personal Data

What are "special categories"/ "sensitive personal data"? These are particularly sensitive types of personal data that require extra protection under data protection laws. We only process these types of data when absolutely necessary and with appropriate safeguards.

In certain circumstances, we may process special categories/ sensitive personal data such as health data (in case of medical incidents or emergencies in the lounge).

4. How We Collect Your Personal Data

We collect your personal data from various sources depending on how you interact with us., which include:

- **Directly from you** when you:

3.8 問卷調查、市場推廣及通訊

我們收集的資料及原因：如閣下訂閱本公司的市場推廣通訊、參與推廣活動、在貴賓室填寫問卷或與本公司的市場推廣互動，我們會收集相關資料以了解閣下的喜好並向閣下發出與貴賓室服務相關的優惠、消息及最新資訊。

- 電郵地址及電話號碼
- 姓名及首選語言
- 市場推廣偏好及同意紀錄
- 通訊紀錄及互動數據（例如是否開啟電郵、點擊紀錄）
- 促銷代碼或禮券的使用情況
- 問卷回覆及意見反映

3.9 特別類別／敏感個人資料

何謂「特別類別／敏感個人資料」？ 此類資料屬特別敏感的個人資料類型，根據個人資料保護法律須獲得額外保護；我們只會在絕對有需要及已採取適當保障措施的情況下處理此等類型資料。

在某些情況下（例如貴賓室內出現醫療事故或緊急情況），我們可能會處理您的特別類別／敏感個人資料，例如健康狀況資料。

4. 我們如何收集閣下的個人資料

我們會視乎閣下與本公司互動的方式，從不同來源收集閣下的個人資料，當中包括：

- 例如在以下情況，**直接由閣下提供**：
 - 在貴賓室接待處出示進場憑證及身分證明文件，以供核實進場使用資格

- Present your access credentials and identity documentation at lounge reception for access eligibility verification
- Fill out forms on our website or at the lounge
- Sign up for marketing communications or newsletters
- Submit complaints, feedback, or inquiries
- Report incidents or request assistance
- Exercise your data subject rights (such as access or deletion requests)
- Participate in surveys, promotions, or competitions
- **From third parties** such as:
 - Airlines and travel partners who grant you lounge access based on your ticket or status
 - Credit card companies and payment processors that provide lounge benefits
 - Membership program providers (e.g., Priority Pass, LoungeKey, DragonPass)
 - Airport operators and security authorities
 - Our business partners and affiliates within the SSP Group
- **Automatically** through technology, including:
 - CCTV surveillance systems installed throughout our lounge facilities
 - Cookies and similar tracking technologies on our website (see Section 7)
 - Server logs and analytics tools that record website usage
 - WiFi access systems (if you connect to lounge WiFi)
- **From publicly available sources** where necessary and lawful, such as:
 - Public business directories
 - Social media platforms (if you interact with us publicly)
 - Regulatory or government databases (for verification purposes)
- 於本公司網站或貴賓室內填寫表格
- 登記接收市場推廣通訊或電子通訊
- 提交投訴、意見反映或查詢
- 報告事故或要求提供協助
- 行使資料當事人權利（例如查閱或刪除資料的要求）
- 參與問卷調查、推廣活動或比賽
- **由第三方取得，例如：**
 - 按閣下機票或會員等級為閣下提供貴賓室使用權的航空公司及旅遊合作夥伴
 - 提供貴賓室優惠的信用卡公司及付款處理機構
 - 會籍計劃服務供應商（例如 Priority Pass、LoungeKey、DragonPass）
 - 機場營運商及保安／執法機關
 - SSP 集團內的業務夥伴及關聯公司
- **透過技術工具自動收集，當中包括：**
 - 設於本貴賓室各處之閉路電視監察系統
 - 本公司網站上之 Cookies 及類似追蹤技術（詳情見第 7 節）
 - 記錄網站使用情況的伺服器日誌及分析工具
 - 無線上網系統（如閣下連接貴賓室 WiFi）
- **在屬必要及合法的情況下，由公開來源取得，例如：**
 - 公開商業名錄
 - 社交媒體平台（如閣下以公開方式與本公司互動）
 - 規管機構或政府資料庫（作核實用途）

5. Purposes and Legal Bases for Processing

We process your personal data for the following purposes and on the following legal bases:

Purpose	Legal Basis
Lounge access and eligibility verification	Performance of contract; Legitimate interests
CCTV surveillance for security and safety	Legitimate interests; Legal obligation
Complaints handling and quality improvement	Legitimate interests; Consent (where required)
Personal incident reporting and management	Legal obligation; Legitimate interests; Vital interests
Processing data subject rights requests	Legal obligation
Compliance with legal and regulatory requirements	Legal obligation
Website functionality and performance	Legitimate interests; Consent (for non-essential cookies)
Survey, marketing communications and promotions	Consent
Analytics and service improvement	Consent; Legitimate interests
Personalized advertising and remarketing	Consent

5. 資料處理的目的及法律依據

我們因下列目的並依據相應的法律依據處理閣下的個人資料：

目的	法律依據
貴賓室進場及資格核實	履行合約；合法利益
就安全及保安目的進行閉路電視監察	合法利益；法律責任
處理投訴及提升服務質素	合法利益；同意（在屬必須時）
個人事故報告及管理	法律責任；合法利益；切身重要利益
處理資料當事人權利申請	法律責任
遵守法律及監管規定	法律責任
網站運作及效能	合法利益；同意（就非必要類 Cookies 而言）
問卷調查、市場推廣通訊及促銷活動	同意
分析用途及服務改進	同意；合法利益
個人化廣告及再行銷	同意

What do these legal bases mean?

- **Consent:** You have given us clear permission to use your personal data for a specific purpose. You can withdraw consent at any time.
- **Performance of contract:** Processing is necessary to provide services you've requested or to fulfill our agreement with you.
- **Legal obligation:** We must process your data to comply with the law (e.g., incident reporting, regulatory requirements).
- **Legitimate interests:** Processing is necessary for our legitimate business purposes, provided your rights and interests are not overridden. We balance our needs against your privacy rights.
- **Vital interests:** Processing is necessary to protect someone's life or physical safety in an emergency.

5.1 Legitimate Interests

When we rely on legitimate interests as our legal basis, it means we have a valid business reason to process your data, and we have carefully balanced this against your privacy rights. Under applicable data protection law, you may have the right to object to processing based on legitimate interests (see Section 12.6).

Where we rely on legitimate interests as the legal basis for processing, our legitimate interests include but not limited to:

- Ensuring the security and safety of lounge guests, staff, and facilities
- Preventing, detecting, and investigating crime, fraud, and misconduct
- Managing and operating our lounge facilities efficiently
- Personal incident reporting and management

上述法律基礎的含義為何？

- **同意：**閣下已明確授權本公司就特定目的使用閣下的個人資料；閣下可隨時撤回該項同意。
- **履行合約：**為向閣下提供所要求的服務或履行我們與閣下之間的合約，需要處理閣下的個人資料。
- **法律責任：**本公司必須為遵守法律而處理閣下的資料（例如事故通報、監管規定）。
- **合法利益：**在不凌駕於閣下的權利及利益的前提下，為符合本公司合法的商業目的而有需要處理閣下的資料；我們會在自身需求與您的隱私權利之間取得平衡。
- **切身重要利益：**在緊急情況下，為保障任何人的生命或人身安全而必須處理資料。

5.1 合法利益

當我們以合法利益作為資料處理的法律依據時，代表本公司就處理閣下資料具有合理及正當的業務理由，並已就該等需要與閣下的私隱權作出審慎權衡。根據適用的個人資料保護法，您有權反對基於合法利益的處理（詳見第 12.6 節）。

當我們以合法利益作為資料處理的法律依據時，本公司的正當利益包括但不限於：

- 確保貴賓室旅客、員工及設施的安全及保安
- 防止、偵測及調查罪行、詐騙及不當行為
- 有效管理及營運貴賓室設施
- 個人事件通報與管理
- 提升服務質素及顧客體驗
- 保障本公司的法律權利及利益
- 履行本公司對航空公司及旅遊合作夥伴所承擔的合約責任

- Improving service quality and customer experience
- Protecting our legal rights and interests
- Complying with contractual obligations to airline and travel partners

5.2 Special Categories/ Sensitive Personal Data

Where we process special categories/sensitive personal data (e.g., health data), we rely on the following additional legal bases:

- required and obtained)
- **Vital interests** (to protect life or physical safety in emergency situations)
- **Legal claims** (establishment, exercise, or defense of legal claims)
- **Substantial public interest** (prevention or detection of unlawful acts)

6. Cookies and Similar Technologies

What are cookies?

Cookies are small text files that are placed on your device (computer, smartphone, tablet) when you visit our website. They help the website remember information about your visit, making it easier to use and allowing us to improve our services. Similar technologies include web beacons, pixels, and local storage.

6.1 Types of Cookies We Use

We use the following categories of cookies on our website:

Strictly Necessary Cookies

- **Purpose:** These cookies are necessary for the website to function properly. They enable core functionality such as security, network management, and accessibility.
- **Examples:** Session cookies, security cookies, load-balancing cookies
- **Legal basis:** Legitimate interests (these cookies are exempt from consent

5.2 特別類別／敏感個人資料

如我們須處理特別類別／敏感個人資料（例如健康資料），會依據下列額外法律基礎：

- 在屬必須及已取得的情況下獲得閣下的明示同意
- 切身重要利益（在緊急情況下為保障生命或人身安全）
- 法律申索（為提出、行使或抗辯法律申索）
- 重大公眾利益（例如防止或偵測違法行為）

6. Cookies 及類似技術

甚麼是 Cookies?

當閣下瀏覽本公司網站時，Cookies 會以小型文字檔案形式儲存在閣下的裝置（例如電腦、智能電話或平板電腦）上。Cookies 有助網站記住閣下的瀏覽資料，令網站更易於使用，亦方便我們改善服務。類似技術包括網頁標記（web beacons）、像素標籤（pixels）及本機儲存技術（local storage）。

6.1 我們所使用的 Cookies 類別

本公司網站會使用下列類別的 Cookies：

絕對必要的 Cookies

- **目的：**此類 Cookies 為確保網站正常運作所必需，支援例如保安、網絡管理及無障礙功能等核心運作。
- **例子：**工作階段 Cookies、保安 Cookies、負載平衡 Cookies。
- **法律依據：**合法利益（由於此類 Cookies 屬絕對必要，因此無須取得閣下同意）。

requirements because they are strictly necessary)

- **Can you refuse them?** No, these cookies cannot be disabled without seriously affecting the functionality of our website.

Preference Cookies

- **Purpose:** These cookies remember your preferences and choices (such as language, region, or accessibility settings) to provide enhanced, personalized features.
- **Examples:** Language preference cookies, user interface customization
- **Legal basis:** Consent
- **Can you refuse them?** Yes, but the website may not remember your preferences on future visits.

Statistics Cookies

- **Purpose:** These cookies help us understand how visitors interact with our website by collecting and reporting information anonymously or in aggregated form. This helps us improve website performance and user experience.
- **Examples:** Google Analytics, website usage statistics, heatmap tools
- **Legal basis:** Consent
- **Can you refuse them?** Yes, without affecting core website functionality.

Marketing/Advertising Cookies

- **Purpose:** These cookies track your browsing activity across different websites to deliver personalized advertisements and measure advertising effectiveness. The intention is to display ads that are relevant and engaging for the individual user and thereby more valuable for publishers and third party advertisers.

- **是否可拒絕?** 不可以；如停用此類 Cookies，將會嚴重影響本公司網站的功能。

偏好設定 Cookies

- **目的:** 此類 Cookies 會記住閣下的偏好及選擇（例如語言、地區或無障礙設定），以提供更佳及更個人化的功能。
- **例子:** 語言偏好 Cookies、使用者介面自訂設定 Cookies。
- **法律依據:** 同意。
- **是否可拒絕?** 可以；但網站日後可能無法記住閣下的個人設定。

統計分析 Cookies

- **目的:** 此類 Cookies 以匿名或匯總形式收集及匯報訪客如何使用本公司網站，有助我們了解使用情況，從而改善網站效能及使用者體驗。
- **例子:** Google Analytics、網站使用統計工具、熱圖分析工具。
- **法律依據:** 同意。
- **是否可拒絕?** 可以；拒絕不會影響網站的核心運作功能。

市場推廣／廣告 Cookies

- **目的:** 此類 Cookies 會追蹤閣下於不同網站的瀏覽活動，以投放個人化廣告及量度廣告成效，務求向個別使用者展示更相關及更具吸引力的廣告，並為發佈商及第三方廣告商帶來更高價值。
- **例子:** Facebook Pixel、Google Ads 再行銷標籤、LinkedIn Insight Tag。
- **法律依據:** 同意。
- **是否可拒絕?** 可以；如拒絕此類 Cookies，閣下所看到的廣告可能會較不切合個人興趣。

- **Examples:** Facebook Pixel, Google Ads remarketing, LinkedIn Insight Tag
- **Legal basis:** Consent
- **Can you refuse them?** Yes. Refusing these cookies means you will see less relevant advertising.

6.2 Cookie Consent and Your Choices

When you first visit our website, you will see a cookie banner that explains our use of cookies and asks for your consent. The banner provides clear options to:

- **Allow all cookies:** This allows all cookies, including analytics and marketing cookies
- **Deny all non-essential cookies:** This allows only essential cookies and blocks analytics and marketing cookies
- **Allow selection:** This is a customize settings that allows you to choose which categories of cookies you want to accept or reject

Both "Allow all" and "Deny" buttons are displayed with equal prominence to ensure you have a free and genuine choice. We will not place non-essential cookies on your device until you have given consent.

How to manage or withdraw cookie consent

You can change your cookie preferences at any time by:

- Clicking the "Cookie Settings" link in the footer of our website
- Adjusting your browser settings to block or delete cookies (see Section 6.3)
- Contacting us using the details in Section 18

Withdrawing consent does not affect the lawfulness of processing based on consent before withdrawal.

6.3 Third-Party Cookies

6.2 Cookies 同意及閣下的選擇

當閣下首次瀏覽本公司網站時，畫面會顯示一個 Cookies 橫幅，說明我們如何使用 Cookies，並徵求閣下的同意。

- **允許所有 Cookies:** 允許所有 Cookies，包括分析及市場推廣 Cookies。
- **拒絕所有非必要 Cookies:** 只允許必要的 Cookies，並拒絕分析及市場推廣 Cookies。
- **按選擇允許:** 此為自訂設定，讓閣下選擇願意接受或拒絕哪些類別的 Cookies。

「允許所有」及「拒絕」按鈕會以同等顯眼方式展示，確保閣下可作出真正自願及自由的選擇。

在閣下給予同意之前，我們不會在閣下裝置上放置非必要 Cookies。

如何管理或撤回對 Cookies 的同意

閣下可隨時透過以下方式更改 Cookies 偏好設定：

- 點擊本公司網站頁底的「Cookies 設定」連結
- 透過調整瀏覽器設定以封鎖或刪除 Cookies（詳見第 6.3 節）
- 依照第 18 節所載聯絡方法與本公司聯絡

撤回同意並不影響在閣下撤回前基於該同意而進行之資料處理的合法性。

6.3 第三方 Cookies

Some cookies on our website are placed by third-party service providers we work with, such as:

- **Analytics providers:** Google Analytics, Adobe Analytics
- **Advertising platforms:** Facebook, Google Ads, LinkedIn
- **Social media plugins:** Facebook, Instagram, Twitter (X)
- **Customer service tools:** Live chat providers, feedback widgets

These third parties may use cookies to collect information about your online activities across different websites. We do not control these third-party cookies. Please refer to the privacy policies of these third parties to understand how they use your data:

- Google Privacy Policy:
<https://policies.google.com/privacy>
- Facebook Data Policy:
<https://www.facebook.com/privacy/policy>
- LinkedIn Privacy Policy:
<https://www.linkedin.com/legal/privacy-policy>

6.4 Managing Cookies Through Your Browser

You can control and manage cookies through your browser settings. Most browsers allow you to:

- View what cookies are stored and delete them individually or all at once
- Block third-party cookies
- Block cookies from specific websites
- Block all cookies from being set
- Delete all cookies when you close your browser

How to access cookie settings in common browsers:

本公司網站所使用的部分 Cookies 由與我們合作的第三方服務供應商設置，例如：

- 分析服務供應商：Google Analytics、Adobe Analytics
- 廣告平台：Facebook、Google Ads、LinkedIn
- 社交媒體外掛：Facebook、Instagram、Twitter (X)
- 客戶服務工具：即時對話服務供應商及意見收集工具等

這些第三方可能會使用 Cookies 收集閣下在不同網站上的網上活動資料。本公司無法控制此等第三方 Cookies。如欲了解這些第三方如何使用閣下的資料，請參閱其私隱政策：

- Google 私隱政策：
<https://policies.google.com/privacy>
- Facebook 資料政策：
<https://www.facebook.com/privacy/policy>
- LinkedIn 私隱政策：
<https://www.linkedin.com/legal/privacy-policy>

6.4 透過瀏覽器管理 Cookies

閣下可透過瀏覽器設定控制及管理 Cookies。大部分瀏覽器均容許閣下：

- 查看已儲存的 Cookies，並個別或一次過刪除
- 封鎖第三方 Cookies
- 封鎖特定網站的 Cookies
- 禁止所有 Cookies 被設定
- 在關閉瀏覽器時刪除所有 Cookies

常見瀏覽器的 Cookies 設定位置如下：

- Google Chrome：設定 > 私隱權與安全性 > Cookies 及其他網站數據

- **Google Chrome:** Settings > Privacy and security > Cookies and other site data
- **Safari:** Preferences > Privacy > Manage Website Data
- **Firefox:** Settings > Privacy & Security > Cookies and Site Data
- **Microsoft Edge:** Settings > Cookies and site permissions > Manage and delete cookies

Please note that deleting or blocking cookies may impact your experience on our website and limit functionality.

6.5 Cookie Retention Periods

Different cookies have different retention periods:

- **Session cookies:** Deleted automatically when you close your browser
- **Persistent cookies:** Remain on your device for a set period (ranging from a few days to several years) or until you manually delete them

You can view the specific retention period for each cookie through our Cookie Settings tool on the website.

7. Marketing Communications and Your Rights

How we use your data for marketing

If you have given us consent or if we have a legitimate interest (for existing customers), we may use your personal data to send you marketing communications about:

- Special offers, promotions, and discounts for lounge access
- New lounge openings or facility upgrades
- Loyalty programs and membership benefits
- Surveys and feedback requests
- News and updates about SSP services

- Safari: 偏好設定 > 私隱權 > 管理網站資料
- Firefox: 設定 > 私隱與安全性 > Cookies 與網站數據
- Microsoft Edge: 設定 > Cookies 與網站權限 > 管理及刪除 Cookies

請注意，如刪除或封鎖 Cookies，可能會影響閣下使用本公司網站的體驗並限制部分功能。

6.5 Cookies 的保存期限

不同 Cookies 會有不同的保存期限:

- **連線階段 Cookies:** 在閣下關閉瀏覽器時會自動刪除。
- **持續性 Cookies:** 會在閣下的裝置上保留一段預設時間（由數天至數年不等），或直至閣下手動將其刪除為止。

閣下可透過本公司網站的「Cookies 設定」工具查閱各個 Cookies 的具體保存期限。

7. 市場推廣通訊及閣下的權利

我們會如何就市場推廣使用閣下的資料

如閣下已向我們給予同意，或在具有正當利益的情況下（針對現有客戶），我們可能會使用閣下的個人資料向您發出下列有關的市場推廣通訊：

- 有關貴賓室使用權的特別優惠、推廣及折扣
- 新貴賓室開幕或設施升級資訊
- 獎賞計劃及會員優惠
- 問卷調查及意見回饋邀請
- 有關 SSP 服務的最新消息及更新

Marketing channels we use

We may contact you through:

- Email newsletters and promotional messages
- SMS/text messages (with your explicit consent)
- Telephone calls (with your consent, for limited purposes)
- Social media and online advertising platforms

7.1 Consent for Marketing

Under data protection law, we need your explicit consent before sending you electronic marketing communications (email, SMS, push notifications) unless you are an existing customer and we are marketing similar services.

We obtain marketing consent by:

- Providing a clear opt-in checkbox on registration or sign-up forms (never pre-ticked)
- Explaining what types of marketing you will receive and how often
- Making it easy for you to opt out at any time
- Keeping records of when and how you gave consent

Existing customer : If you are an existing customer (you have previously used our lounge services or purchased access), we may send you marketing about similar services based on our legitimate interest, but you always have the right to opt out.

7.2 How to Opt Out of Marketing

You can opt out of receiving marketing from us at any time by:

- Clicking the "unsubscribe" or "opt-out" link in any marketing email

我們使用的市場推廣渠道

我們可能透過以下渠道與閣下聯絡：

- 電郵通訊及推廣資訊
- 短訊（須事先取得閣下的明示同意）
- 以電話聯絡（在取得閣下同意及於有限目的下進行）
- 社交媒體及網上廣告平台

7.1 就市場推廣所作出的同意

根據個人資料保護法律，除非閣下屬現有顧客且我們就類似服務作出市場推廣，否則在向閣下發出電子市場推廣通訊（例如電郵、短訊、推送通知）前，我們必須先取得閣下的明確同意。

我們會透過以下方式取得閣下就市場推廣所作出的同意：

- 在登記或申請表格上提供清晰的自願勾選欄位（絕不會預先剔選）
- 清楚說明閣下將會收到的市場推廣類型及大約發送頻率
- 為閣下提供簡便方式，可隨時選擇停止接收市場推廣
- 保存閣下何時及以何種方式給予同意的紀錄

現有顧客：如閣下為現有顧客（即曾使用本公司貴賓室服務或購買使用權），我們或會基於正當利益就類似服務向閣下發出市場推廣資訊，但閣下有選擇取消訂閱/停止接收的權利。

7.2 如何拒絕接收市場推廣通訊

閣下可隨時透過以下方式停止接收本公司的市場推廣通訊：

- 點擊任何市場推廣電郵中的「取消訂閱」或「停止接收」連結

- Replying "STOP" to SMS marketing messages
- Adjusting your preferences in your online account (if applicable)
- Contacting us directly using the details in Section 18
- Managing notification settings on your mobile device

We will process your opt-out request promptly, typically within 7 business days and in any event within the maximum response period prescribed by applicable law. Please note that even if you opt out of marketing, we may still send you non-marketing communications related to your lounge access, bookings, or service-related updates.

7.3 Third-Party Marketing

We do not sell or rent your personal data to third parties for their marketing purposes. However, we may share your data with carefully selected business partners (such as airlines, credit card programs, or airport services) to send you joint marketing offers, but only with your explicit consent.

If you consent to receive marketing from our partners, you will need to opt out directly with each partner. We will clearly identify when marketing consent includes third parties.

8. CCTV Surveillance

8.1 Purpose and Scope

We operate CCTV surveillance systems throughout our lounge facilities for the following purposes:

- Security and safety of guests, staff, and property
- Prevention, detection, and investigation of crime and misconduct

- 在市場推廣短訊回覆「STOP」或其他指示字句
- 於線上帳戶內調整閣下的偏好設定（如適用）
- 按第 18 節所載聯絡方式直接與本公司聯絡
- 於閣下的流動裝置上管理通知設定

我們會盡快處理閣下的退出要求，一般會在七個工作天內完成，並且在任何情況下均不超過適用法律規定的最長回應期限。請注意，即使閣下已選擇不接收市場推廣通訊，我們仍可能就貴賓室使用權、預訂事宜或服務相關更新向閣下發出非市場推廣性質的通知。

7.3 第三方市場推廣

我們不會將閣下的個人資料出售或出租予第三方用於其自身的市場推廣用途。然而，在取得閣下明示同意的前提下，我們或會與經審慎挑選的業務合作夥伴（例如航空公司、信用卡計劃或機場服務供應商）共享閣下的資料，以便向閣下發出聯合推廣優惠。

如閣下同意接收我們合作夥伴所發出的市場推廣資訊，日後如欲停止接收，須直接向各有關合作夥伴提出退出要求。我們會清楚說明當中任何市場推廣同意是否包括第三方。

8. 閉路電視監察

8.1 目的及適用範圍

我們在貴賓室各處設置閉路電視監察系統，並基於下列目的使用相關系統：

- 保障旅客、員工及財物的安全及保安
- 防止、偵測及調查罪行及不當行為
- 符合機場保安規定及履行法律責任（如適用）

- Compliance with airport security requirements and legal obligations (where applicable)

8.2 Access to CCTV Footage

Access to CCTV footage is strictly controlled and restricted to authorized personnel only. We have security measures in place to prevent unauthorized access. Footage may be shared with:

- Law enforcement agencies and regulatory authorities (when legally required)
- Legal advisors and insurers (for incident investigation and legal claims)
- Third-party service providers (under strict confidentiality obligations)
- Employees of SSPADL and/or SSPADL's Affiliates within the SSP group (legitimate interest)

8.3 Retention of CCTV Footage

How long we keep CCTV footage?

CCTV footage is automatically deleted after **30 days** unless required to be retained longer for:

- Ongoing incident investigations
- Legal proceedings or potential legal claims
- Compliance with legal or regulatory requirements

9. Disclosure of Personal Data

Who do we share/disclose your data with?

We may need to share/disclose your personal data with other organizations to provide our services, comply with legal obligations, or operate our business. We only share/disclose data when necessary and ensure recipients protect your data appropriately.

We may disclose your personal data to the following categories of recipients:

8.2 存取閉路電視錄像

存取閉路電視錄像受到嚴格管制，只限獲授權人員方可查閱。我們已採取保安措施，以防止任何未獲授權的存取行為。錄像可能會向下列人士或機構披露：

- 執法機關及監管機構（在法律要求的情況下）
- 法律顧問及保險公司（用於事故調查及處理法律申索）
- 第三方服務供應商（於嚴格保密義務下）
- SSPADL 及／或 SSP 集團內關聯公司的僱員（基於合法利益）

8.3 閉路電視錄像的保存期限

我們會保存閉路電視錄像多久？

閉路電視錄像一般會在 30 日後自動刪除，除非因下列原因而須延長保存期限：

- 正在進行的事故調查
- 法律程序或潛在法律申索
- 為遵守法律或監管規定之需要

9. 個人資料的披露

我們會向哪些人士或機構分享/披露閣下的資料？

為提供服務、履行法律責任或營運本業務，我們或需與其他機構分享/披露閣下的個人資料。我們只會在屬必要時才分享/披露相關資料，並確保接收方妥善保障閣下的個人資料。

我們可能向下列類別的收件人披露閣下的個人資料：

9.1 Within SSP Group

Our corporate family

- SSP Asia Pacific (SSPAP) and other SSP group entities for group reporting, management, and compliance purposes
- Shared service functions (IT, legal & compliance, HR)

9.2 Third-Party Service Providers

External companies that help us operate

- IT service providers and cloud hosting providers
- CCTV system maintenance and support providers
- Security service providers
- Incident management and insurance providers
- Professional advisors (legal, audit, consulting)
- Insurer

9.3 Business Partners

Organizations we work with to provide lounge access

- Airlines and travel partners
- Credit card companies and membership program providers
- Airport operators and authorities

9.4 Legal and Regulatory Authorities

Government and law enforcement (when legally required)

- Law enforcement agencies
- Regulatory authorities and government bodies
- Courts and tribunals
- Office of the Privacy Commissioner for Personal Data

9.5 Marketing and Advertising Partners

Third parties involved in our marketing activities (with your consent)

9.1 SSP 集團內部

本公司的企業集團

- SSP Asia Pacific (SSPAP) 及其他 SSP 集團成員公司，用於集團層面的匯報、管理及合規目的
- 共享服務部門（例如資訊科技、法律及合規、人力資源）

9.2 第三方服務供應商

協助我們營運業務的外部公司

- 資訊科技服務供應商及雲端託管服務供應商
- 閉路電視系統維護及技術支援服務供應商
- 保安服務供應商
- 事故管理及保險服務供應商
- 專業顧問（包括法律、審計及顧問服務）
- 保險公司

9.3 業務合作夥伴

與我們合作提供貴賓室使用權的機構

- 航空公司及旅遊合作夥伴
- 信用卡公司及會籍計劃服務供應商
- 機場營運商及相關機場管理當局

9.4 法律及監管機關

政府及執法機關（在法律要求的情況下）

- 執法機關
- 監管機構及政府部門
- 法院及審裁機構
- 個人資料私隱專員公署

9.5 市場推廣及廣告合作夥伴

在取得閣下同意的前提下，參與我們市場推廣活動的第三方

- Email marketing service providers (e.g., Mailchimp, SendGrid)
- Advertising platforms (e.g., Google Ads, Facebook Ads, LinkedIn)
- Social media platforms (when you interact with our social content)
- Analytics providers (e.g., Google Analytics)
- Customer relationship management (CRM) systems

All third-party recipients are required to protect your personal data in accordance with applicable data protection laws and our contractual requirements. We enter into data processing agreements with service providers to ensure they handle your data securely and only for the purposes we specify.

10. International Data Transfers

Why your data might leave Hong Kong

Because we are part of a global group and use international service providers, your personal data may be transferred to, stored, and processed in countries outside Hong Kong. We ensure these transfers are protected.

Your personal data may be transferred to, stored, and processed in countries outside Hong Kong, including:

- Other countries in the Asia-Pacific region where SSP group entities operate
- European Economic Area (EEA) countries
- United Kingdom
- Other countries where our service providers are located

10.1 Transfer Safeguards

How we protect your data when transferring abroad

We ensure that international data transfers comply with applicable data protection law

- 電郵市場推廣服務供應商（例如 Mailchimp、SendGrid）
- 廣告平台（例如 Google Ads、Facebook Ads、LinkedIn）
- 社交媒體平台（在閣下與我們的社交媒體內容互動時）
- 分析服務供應商（例如 Google Analytics）
- 客戶關係管理（CRM）系統服務供應商

所有第三方收件人均須按照適用的資料保障法例及我們的合約要求保障閣下的個人資料。我們會與服務供應商訂立資料處理協議，以確保其以安全方式並僅為我們指定的目的處理閣下的個人資料。

10. 個人資料的跨境轉移

為何閣下的資料可能被轉移離開香港

由於我們屬於全球性集團的一部分，並使用跨國服務供應商，閣下的個人資料可能會被轉移至香港以外的國家並於當地儲存及處理。我們會確保有關跨境轉移受適當保障。

閣下的個人資料可能會被轉移至香港以外的國家並於當地儲存及處理，包括：

- SSP 集團成員營運所在的其他亞太區國家
- 歐洲經濟區（EEA）國家
- 英國
- 其他我們的服務供應商所在的國家

10.1 跨境轉移的保障措施

我們如何在將資料轉移往境外時保障閣下的資料

我們會採取適當的保障措施，以確保任何跨境資料轉移均符合適用的資料保障法例要求，當中包括：

requirements by implementing appropriate safeguards, including:

- Transfers to countries with adequate data protection standards as determined by regulator
- Adequacy decisions
- Standard contractual clauses
- Binding corporate rules
- Appropriate contractual clauses such as data processing agreement/ data transfer agreement
- Your explicit consent (where required)

For more information about our international data transfer mechanisms we have in place, please contact us using the details in Section 18.

11. Data Retention

How long we keep your personal data?

We do not keep your personal data longer than necessary. Retention periods depend on the type of data and the purposes for which we use it, balanced against legal requirements to retain certain records.

We retain your personal data only for as long as necessary to fulfill the purposes for which it was collected and to comply with legal and regulatory requirements.

What happens after retention periods expire

After the retention period expires, we will securely delete or anonymize your personal data in accordance with our data retention and deletion policies. Deletion means your data is permanently destroyed. Anonymization means data is altered so it can no longer identify you, allowing us to use it for statistical purposes.

12. Your Data Subject Rights

Data protection laws such as PDPO and GDPR give you important rights regarding your

- 向由監管機構評定為具備足夠資料保障水平的國家進行轉移
- 「足夠保護程度」的決定 (Adequacy decisions)
- 《標準合約條款》 (Standard Contractual Clauses)
- 企業約束規則 (Binding Corporate Rules)
- 適當的合約條款，例如資料處理協議／資料轉移協議
- 在屬必要時取得閣下的明確同意

如欲進一步了解我們就跨境資料轉移所採用的機制，請按照第 18 節所載聯絡方法與我們聯絡。

11. 資料保存期限

我們會保存閣下的個人資料多久？

我們不會將閣下的個人資料保存超過所需時間。具體保存期限取決於資料的類別及其使用目的，並同時考慮有關法律就某些紀錄的最低保存要求。

我們只會在為達成收集該等個人資料之目的及遵守法律和監管要求所必需的期間內保留相關資料。

在保存期限屆滿後會發生甚麼事

在保存期限屆滿後，我們會根據本公司的資料保存及刪除政策，安全地刪除或匿名化處理閣下的個人資料。「刪除」是指有關資料會被永久銷毀。匿名化」是指將資料作出處理，使其不再能識別閣下身分，讓我們仍可將其用於統計等用途。

12. 閣下作為資料當事人的權利

《私隱條例》及 GDPR 等個人資料保護法律賦予閣下就個人資料享有多項重要權利。這些

personal data. These rights empower you to control how we use your information.

Depending on which data protection laws apply to the relevant processing (for example, the Hong Kong PDPO or the GDPR), you may have some or all of the following rights in relation to your personal data:

12.1 Right of Access

(available under PDPO and GDPR, where applicable)

What this means: You can ask us to confirm whether we are processing your personal data and request a copy of that data.

What you will receive: A copy of your personal data, information about how we use it, who we share it with, how long we keep it, and details about your other rights.

12.2 Right to Rectification

(available under PDPO and GDPR, where applicable)

What this means: If your personal data is inaccurate or incomplete, you can ask us to correct or update it.

Example: If we have an old email address or incorrect membership number, you can request us to update it.

12.3 Right to Erasure

(available under GDPR where applicable; not provided in the same form under PDPO)

What this means: You can request that we delete your personal data in certain situations.

You have the right to request deletion of your personal data in the following circumstances:

- The data is no longer necessary for the purposes for which it was collected

權利讓閣下可更有效掌控我們如何使用閣下的資料。

根據適用於相關處理的個人資料保護法律（例如香港《私隱條例》或 GDPR），您可能對您的個人資料擁有部分或全部以下權利：

12.1 查閱權

在適用情況下，依據《私隱條例》及 GDPR 提供）

涵義：閣下可要求我們確認是否正就閣下的個人資料進行處理，並索取一份該等資料的副本。

閣下將會收到：一份閣下個人資料的副本，以及有關我們如何使用該等資料、與哪些人士或機構分享、保存期限為何及閣下其他相關權利的說明。

12.2 更正權

在適用情況下，依據《私隱條例》及 GDPR 提供）

涵義：如閣下的個人資料不準確或不完整，閣下可要求我們更正或更新相關資料。

例子：如我們保存的是舊有電郵地址或錯誤的會員編號，閣下可要求我們將其更新。

12.3 刪除權

（在適用的情況下依據 GDPR 可獲得；依據《私隱條例》下不以相同形式提供）

涵義：在特定情況下，閣下可要求我們刪除閣下的個人資料。

在下列情況下，閣下有權要求刪除個人資料：

- 該等資料已不再符合其最初收集目的之需要

- You withdraw consent (where processing is based on consent)
- You object to processing based on legitimate interests and there are no overriding legitimate grounds
- The data has been unlawfully processed
- Erasure is required to comply with a legal obligation

12.4 Right to Restriction of Processing (available under GDPR where applicable; not provided in the same form under PDPO)

What this means: You can ask us to temporarily stop using your personal data in certain situations, rather than deleting it entirely.

When this applies: For example, if you contest the accuracy of data, we will restrict processing while we verify it.

12.5 Right to Data Portability (available under GDPR only where applicable; not provided under PDPO)

What this means: You can request your personal data in a common electronic format (like CSV or JSON) so you can move it to another service provider.

Limitations: This right only applies to data you provided to us with consent or under a contract, and only where technically feasible.

12.6 Right to Object (depends on the purpose as described below)

What this means: You can object to us processing your data based on legitimate interests or for direct marketing purposes.

Marketing (available under PDPO and GDPR): You have an absolute right to object to

- 閣下撤回同意（在資料處理是基於同意的情況下）
- 閣下反對基於正當利益而進行的處理，且我們並無壓倒性的正當理由繼續處理
- 資料曾被非法處理
- 為遵守法律義務而必須刪除資料

12.4 限制處理權 （在適用的情況下依據 GDPR 可獲得；依據《私隱條例》下不以相同形式提供）

涵義：在特定情況下，閣下可要求我們暫時停止使用閣下的個人資料，而非將其完全刪除。

適用情況：例如，如閣下質疑某些資料是否準確，我們會在核實期間限制使用該等資料。

12.5 資料可攜權 （僅在適用的情況下依據 GDPR 提供；《私隱條例》下並沒有此權利）

涵義：閣下可要求我們以常用的電子格式（例如 CSV 或 JSON）提供閣下的個人資料，以便將之轉移至其他服務供應商。

限制：此權利僅適用於閣下在同意或合約基礎上向我們提供的資料，且須在技術上可行的情況下方可行使。

12.6 反對處理權 （取決於下文所述的目的）

涵義：閣下可反對我們基於正當利益或為直接促銷／市場推廣目的而處理閣下的資料。

市場推廣（在適用情況下，依據《私隱條例》及 GDPR 提供）：閣下有絕對權利在任何

marketing at any time (see Section 7.2 for easy opt-out options).

Other processing (available under GDPR, where applicable): For processing based on legitimate interests, you can object and we will stop unless we have compelling legitimate grounds that override your interests.

12.7 Right to Withdraw Consent (available under PDPO and GDPR, where applicable)

What this means: If we process your data based on consent (like marketing or non-essential cookies), you can withdraw that consent at any time.

How to withdraw: See Section 7.2 for marketing opt-out and Section 6.2 for cookie consent withdrawal.

Important: Withdrawal does not affect the lawfulness of processing that occurred before you withdrew consent.

12.8 Right to Lodge a Complaint

What this means: If you are unhappy with how we handle your personal data, you have the right to complain to the relevant data protection authority.

You have the right to lodge a complaint with the relevant supervisory authority:

Hong Kong:

Office of the Privacy Commissioner for Personal Data

Website: <https://www.pcpd.org.hk>

UK:

Information Commissioner's Office

Website: <https://www.ico.org.uk>

European Union (if applicable):

時間反對接收市場推廣（可參閱第 7.2 節了解簡便的退出方式）。

其他處理（在適用情況下，依據 GDPR 提供）：對於基於正當利益進行的處理，閣下可提出反對；除非我們能提出凌駕閣下利益的充份正當理由，否則我們會停止有關處理。

12.7 撤回同意權

（在適用情況下，依據《私隱條例》及 GDPR 提供）

涵義：如我們乃基於閣下的同意而處理資料（例如市場推廣或非必要 Cookies），閣下可於任何時間撤回該項同意。

如何撤回：就市場推廣通訊，請參閱第 7.2 節；就 Cookies 同意，請參閱第 6.2 節。

重要事項：撤回同意並不影響在閣下撤回前基於該同意而進行之資料處理的合法性。

12.8 投訴權

涵義：如閣下不滿我們處理閣下個人資料的方式，閣下有權向相關資料保障監管機構提出投訴。

閣下有權向相關的監管機構提出投訴：

香港：

個人資料私隱專員公署

網站: <https://www.pcpd.org.hk>

英國：

Information Commissioner's Office

Website: <https://www.ico.org.uk>

歐盟（如適用）：

閣下可向閣下居住國或涉嫌違規行為發生地之監管機構提出投訴。

You may lodge a complaint with the supervisory authority in your country of residence or the country where the alleged infringement occurred.

12.9 Exercising Your Rights

How to make a request

To exercise any of your data subject rights, please contact us using the details provided in Section 18. We will respond to your request within 30 days (maybe extended for complex requests, in which case, we will update you and provide you with a reason for the extension).

Identity verification

We may require verification of your identity before processing your request to protect your personal data from unauthorized access. We may ask you to provide identification documents or answer security questions.

No fee usually

We will not charge a fee for processing your request unless it is manifestly unfounded, excessive, or repetitive. If we charge a fee, we will inform you in advance.

12.10 Limitations on Rights

When rights may be restricted

Please note that your rights are not absolute and may be limited or restricted in certain circumstances, including:

- Where processing is necessary for compliance with legal obligations
- Where processing is necessary for establishment, exercise, or defense of legal claims
- Where processing is necessary for reasons of public interest
- Where disclosure would adversely affect the rights and freedoms of others
- Where exemptions apply under applicable data protection laws

12.9 行使閣下的權利

如何提出相關要求

如欲行使上述任何資料當事人權利，請按照第 18 節所載聯絡方法與我們聯絡。我們一般會在 30 日內回覆閣下的要求；如因要求性質複雜而需要延長處理時間，我們會通知閣下並說明延長原因。

身分核實

為防止未獲授權人士查閱閣下的個人資料，我們在處理要求前或會要求核實閣下的身分。我們可能會要求閣下提供身分證明文件或回答保安問題。

一般毋須收費

除非閣下的要求顯屬毫無根據、過度或重複，否則我們不會就處理該等要求收取任何費用。如有需要收費，我們會事先通知閣下。

12.10 權利的限制

在何種情況下權利或會受限制

請注意，閣下的權利並非絕對，在某些情況下可能會受到限制，包括：

- 資料處理是為遵守法律義務所必需
- 資料處理是為提出、行使或抗辯法律申索所必需
- 資料處理是基於公共利益理由所必需
- 如披露資料會對他人的權利及自由造成不利影響
- 適用資料保障法例所載豁免條文的情況下
- 若適用於您個人資料相關處理的資料保護法未提供特定法定權利

- Where a particular statutory right is not provided under the data protection law that applies to the relevant processing of your personal data

13. Data Security

How we protect your data

We take the security of your personal data seriously and implement appropriate technical and organizational security measures to protect your personal data against unauthorized access, disclosure, alteration, and destruction. Our security measures include:

- Access controls and authentication mechanisms
- Encryption of data in transit and at rest (where appropriate)
- Regular security assessments and audits
- Staff training on data protection and security
- Incident response and data breach management procedures
- Physical security measures for premises and equipment
- Secure disposal and destruction of personal data

14. Data Breach Notification

What happens if there is a security incident

Despite our best efforts, security breaches can occur. In the event of a personal data breach that is likely to result in a risk to your rights and freedoms, we will:

- Notify the Office of the Personal Data Protection Commission and/or the relevant supervisory authority within **72 hours** of becoming aware of the breach (where feasible)

13. 資料數據安全

我們如何保障閣下的資料

我們非常重視閣下個人資料的安全，並採取適當的技術及組織保安措施，以防止個人資料遭到未獲授權的存取、披露、更改或毀壞。我們採用的保安措施包括：

- 存取權限控制及身分驗證機制
- 在適當情況下對傳輸中及靜態儲存的資料進行加密
- 定期進行保安評估及審核
- 就資料保障及保安事宜向員工提供培訓
- 資料保安事故及資料外洩的應變及處理程序
- 就處所及設備採取實體保安措施
- 以安全方式處置及銷毀個人資料

14. 資料外洩通報

如發生保安事故會如何處理

儘管我們已作出最大努力，保安事故或資料外洩事件仍有可能發生。如發生可能對閣下的權利與自由構成風險的個人資料外洩事件，我們會：

- 在可行情況下，於知悉外洩事件後 72 小時內，通報個人資料保障監管機關及／或其他相關監管機構

- Notify affected individuals **without undue delay** if the breach poses a high risk to their rights and freedoms

15. Children's Privacy

Our lounge services are not directed at children under the age of 18 (the legal age under Hong Kong law). We do not knowingly collect personal data from children without parental consent.

If you are a parent or guardian and believe that your child has provided us with personal data without your consent, please contact us immediately. We will take steps to delete such data from our systems.

16. Automated Decision-Making and Profiling

We do not engage in automated decision-making (including profiling) that produces legal effects or similarly significantly affects you without human intervention.

What this means: We do not use algorithms or automated systems to make decisions about you that would have legal consequences or significantly impact you (such as automatically denying lounge access or determining pricing based solely on automated profiling).

If our practices change in the future, we will update this Privacy Notice and, where required by law, obtain your consent or provide you with the right to object.

17. Third-Party Links

Our communications or lounge facilities may include links to third-party websites, services, or applications. This Privacy Notice does not apply to those third parties. We are not

- 如外洩事件對受影響人士的權利與自由構成高度風險，我們會毫不遲延地通知有關人士

15. 兒童私隱

本貴賓室服務並非以 18 歲以下人士（根據香港法律的法定年齡）為對象。在未獲家長同意的情況下，我們不會在知情下收集兒童的個人資料。

如閣下為家長或監護人並相信閣下的子女在未獲閣下同意下向我們提供了個人資料，請立即與我們聯絡。我們會採取措施，把有關資料從本公司的系統中刪除。

16. 自動化決策及建立個人檔案分析

本公司不會在欠缺人工干預的情況下，進行對閣下產生法律效果或有類似重大影響的自動化決策（包括建立個人檔案分析）。

涵義：我們不會單純依賴演算法或自動化系統，就閣下作出帶來法律後果或對閣下造成重大影響的決定（例如單純基於自動化的個人檔案分析而自動拒絕貴賓室使用權或決定收費）。

如日後我們的做法有任何改變，我們會更新本私隱政策聲明，並在法律要求時，徵求閣下的同意或賦予閣下反對該等處理的權利。

17. 第三方連結

我們的通訊或貴賓室設施內，可能會載有通往第三方網站、服務或應用程式的連結。本私隱政策聲明並不適用於上述第三方。我們

responsible for the privacy practices of third parties, and we encourage you to review their privacy policies.

18. Changes to This Privacy Notice

We may update this Privacy Notice from time to time to reflect changes in our practices, legal requirements, or for other operational, legal, or regulatory reasons.

When we make material changes, we will:

- Update the "Last Updated" date at the top of this notice
- Display the updated notice prominently at our lounge reception and on our website

We encourage you to review this Privacy Notice periodically to stay informed about how we protect your personal data.

19. Contact Us

If you have any questions, concerns, or requests regarding this Privacy Notice or our processing of your personal data, please contact us:

SSP AD Lounges HK Limited

Attention: Data Protection / Privacy Team

Suites 1201-2 & 12-14, 12/F.,
North Tower, World Finance Centre,
Harbour City, Tsim Sha Tsui,
Hong Kong.
Email: privacynotice@ssp.com.hk

Regional Contact:

For regional data protection matters across
Asia-Pacific:
SSP Asia Pacific Data Protection Team
Email: privacynotice@ssp.com.hk

並不對第三方的私隱措施承擔責任，並建議閣下查閱有關第三方的私隱政策。

18. 本私隱政策聲明的修訂

我們可能會不時更新本私隱政策聲明，以反映我們做法、法律要求或其他營運、法律或監管上的變動。

如作出重大修訂，我們將會：

- 更新本通知開首所載的「最後更新日期」
- 在貴賓室接待處及本公司網站上顯眼位置展示更新後的通知

我們鼓勵閣下不時查閱本私隱政策聲明，以了解我們如何保障閣下的個人資料。

19. 聯絡我們

如對本私隱政策聲明或我們處理閣下個人資料的方式有任何疑問、關注或要求，請按以下方式聯絡我們：

SSP AD Lounges HK Limited

收件人：資料保障部

香港尖沙咀海港城世界金融中心北座十二樓
1201-2 及 12-14 室

電郵： privacynotice@ssp.com.hk

亞太區聯絡：

就亞太區的資料保障事宜：

SSP Asia Pacific 資料保障部

電郵： privacynotice@ssp.com.hk

20. Language

This Privacy Notice is provided in English and Chinese (Traditional) language. In the event of any conflict or inconsistency between the English and Chinese (Traditional) versions, the English version shall prevail to the extent permitted by applicable law.

20. 語言版本

本私隱政策聲明備有英文及繁體中文版本。如英文與繁體中文版本之間有任何歧異或不一致，於適用法律所容許的範圍內，概以英文版本為準。

[The remainder of this page is intentionally left blank.]

[本頁以下部分特意留空。]